west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

July 8, 2016

CERTIFIED MAIL
91 7199 9991 7033 2721 4128

Jeffrey D. Goad
2501 Guyan Ave.
Huntington, WV 25703

Re: Rubberlite, Incorporated
Huntington Facility
Permit No. R13-2948B
Plant ID No. 011-00174

Dear Mr. Goad:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-2948B is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

In accordance with 45CSR30- Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

Enclosures

West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Modification Permit

R13-2948B

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Rubberlite, Incorporated
Huntington Facility
011-00174

William F. Durham
Deputy Director

Effective: July 8, 2016

This permit will supercede and replace Permit R13-2948A.

Facility Location:	Huntington, Cabell County, West Virginia
Mailing Address:	2501 Guyan Avenue; Huntington, WV 25703
Facility Description:	Foam Production and Fabrication Facility
NAICS Codes:	326291
UTM Coordinates:	4,254.328 km Easting • 376.588 km Northing • Zone 17
Permit Type:	Modification

Description of Change:

Addition of a foam production line, a bun press, hot melt laminator, three (3) roll coaters, a solvent cleaning station, a flame laminator and an emergency generator.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is not subject to 45CSR30.

Table of Contents

1.0. Emission Units 4

2.0. General Conditions 6
2.1. Definitions 6
2.2. Acronyms 6
2.3. Authority 7
2.4. Term and Renewal 7
2.5. Duty to Comply 7
2.6. Duty to Provide Information 7
2.7. Duty to Supplement and Correct Information 7
2.8. Administrative Permit Update 7
2.9. Permit Modification 8
2.10. Major Permit Modification 8
2.11. Inspection and Entry 8
2.12. Emergency 8
2.13. Need to Halt or Reduce Activity Not a Defense 9
2.14. Suspension of Activities 9
2.15. Property Rights 9
2.16. Severability 9
2.17. Transferability 9
2.18. Notification Requirements 9
2.19. Credible Evidence 9

3.0. Facility-Wide Requirements 10
3.1. Limitations and Standards 10
3.2. Monitoring Requirements 10
3.3. Testing Requirements 10
3.4. Recordkeeping Requirements 11
3.5. Reporting Requirements 12

4.0. Source-Specific Requirements 13
4.1. Limitations and Standards 13
4.2. Monitoring Requirements 20
4.3. Testing Requirements 20
4.4. Recordkeeping Requirements 24
4.5. Reporting Requirements 28

APPENDIX A 32

CERTIFICATION OF DATA ACCURACY 33

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device
Production Process					
1S	1E	Foam Production Unit No.1	1999	2,135,024 ft/yr	None
10S	10E	ISO Tanks	1999	2 - 7,000 gallon 3 - 800 gallon	None
11S	11E	Glycol Tanks	1999	5 to 330 gallons	None
15S	15E	Foam Production Unit No.2	2016	2,135,024 ft/yr	None
16S	16E	ISO Tanks	2016	2 - 7,000 gallon 3 - 800 gallon	None
17S	17E	Glycol Tanks	2016	5 to 330 gallons	None
Fabrication Process					
2S	2E	Bun press No.1	1989	N/A	None
3S	3E	Hot Melt Laminator No. 1	2007	45.92 ft/min	None
4S	4E	Hot Melt Laminator No. 2	2012	45.92 ft/min	None
5S	5E	Buffer	2005	30 ft/min	1C, 2C
6S	6E	Misting Unit	2010	27.0 ft/min	None
7S	7E	Roll Coater #1 with Natural Gas Oven	2013	minimum 8.2 ft/min* 6.54 MMBtu/hr	None
13S	13E	Roll Coater #2 with Infrared	2013	minimum 8.2 ft/min*	None
18S	18E	Bun Press No. 2	2016	N/A	None
19S	19E	Hot Melt Laminator No. 3	2016	45.92 ft/min	None
20S	20E	Roll Coater #3 with Natural Gas Oven	2016	minimum 8.2 ft/min* 6.54 MMBtu/hr	None
21S	21E	Roll Coater #4 with Natural Gas Oven	2016	minimum 8.2 ft/min* 6.54 MMBtu/hr	None
22S	22E	Roll Coater #5 with Natural Gas Oven	2016	minimum 8.2 ft/min* 6.54 MMBtu/hr	None
25S	25E	Flame Laminator	2016	37 ft/min	None
Miscellaneous					
8S	8E	Solvent Cleaning Stations	1999/ 2007	N/A	None
9S	9E	Lab Production Unit (R&D)	2011	N/A	None

1.0 Emission Units

12S	12E	Vehicle Activity	1989	N/A	None
14S	14E	Solvent Cleaning Station	2013	N/A	None
23S	23E	Solvent Cleaning Stations	2016	N/A	None
24S	24E	Emergency Generator (Diesel)	2007	157.5 hp	None

Control Devices

Control Device ID	Control Device Description	Year Installed/ Modified	Design Capacity
1C	Sternvent single-stage mechanical collector; Model No. CYA-4800	2005	n/a
2C (BH1, BH2)	Sternvent baghouse; Model No. AFAE 5612D	2005	99.9% (urethane dust)

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**pph**	Pounds per Hour
CBI	Confidential Business Information	**ppm**	Parts per Million
CEM	Continuous Emission Monitor	**Ppmv or ppmv**	Parts per million by volume
CES	Certified Emission Statement	**PSD**	Prevention of Significant Deterioration
C.F.R. *or* CFR	Code of Federal Regulations		
CO	Carbon Monoxide	**psi**	Pounds per Square Inch
C.S.R. *or* CSR	Codes of State Rules	**SIC**	Standard Industrial Classification
DAQ	Division of Air Quality		
DEP	Department of Environmental Protection	**SIP**	State Implementation Plan
		SO_2	Sulfur Dioxide
dscm	Dry Standard Cubic Meter	**TAP**	Toxic Air Pollutant
FOIA	Freedom of Information Act	**TPY**	Tons per Year
HAP	Hazardous Air Pollutant	**TRS**	Total Reduced Sulfur
HON	Hazardous Organic NESHAP	**TSP**	Total Suspended Particulate
HP	Horsepower	**USEPA**	United States Environmental Protection Agency
lbs/hr	Pounds per Hour		
LDAR	Leak Detection and Repair	**UTM**	Universal Transverse Mercator
M	Thousand		
MACT	Maximum Achievable Control Technology	**VEE**	Visual Emissions Evaluation
		VOC	Volatile Organic Compounds
MDHI	Maximum Design Heat Input	**VOL**	Volatile Organic Liquids
MM	Million		
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour		
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour		
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		
NSPS	New Source Performance Standards		
PM	Particulate Matter		
$PM_{2.5}$	Particulate Matter less than 2.5μm in diameter		
PM_{10}	Particulate Matter less than 10μm in diameter		
Ppb	Pounds per Batch		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation.*

2.4. Term and Renewal

2.4.1. This permit supercedes and replaces previously issued Permit R13-2948A. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2948, R13-2948A, R13-2948B and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based 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 preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that 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 emission standards, or other requirements in the permit; and,

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1]**

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee.**

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. In accordance with the information filed in Permit Application R13-2948, R13-2948A and R13-2948B, the equipment identified under Section 1.0 of this permit shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants, shall not exceed the listed maximum design capacities, and shall use the specified control devices.

4.1.2. The permittee shall not exceed the hourly and annual emission limits established in Table 4.1.2. Annual emission limits are on a 12-month rolling basis.

Table 4.1.2. - Emission Limits

Emission Point ID	Emission Unit ID	Emission Unit Description	Regulated Pollutant	Maximum Potential Controlled Emissions	
				lb/hr	tpy
1E, 9E & 15E	1S, 9S & 15S	Foam Production Unit #1 & #2 and Lab Prod. Unit (R&D)	Total VOC	6.88	30.16
			Total HAP	0.02	0.02
2E & 18E	2S & 18S	Bun Press	Total VOC	5.48	5.48
			Total HAP	2.76	2.76
3E, 4E & 19E	3S, 4S & 19S	Hot Melt Laminator No. 1, No. 2 & No. 3	Total VOC	3.75	8.78
			Total HAP	3.75	8.78
5E	5S	Buffer	PM	0.01	0.01
			PM_{10}	0.01	0.01
			$PM_{2.5}$	0.01	0.01
6E	6S	Misting Unit	Total VOC	0.62	0.40
			Total HAP	0.62	0.40
7E, 13E, 20E, 21E & 22E	7S, 13S, 20S, 21S & 22S	Roll Coaters and NG Dryers	CO	2.24	9.72
			NO_X	2.64	11.60
			PM	0.24	0.88
			PM_{10}	0.24	0.88
			$PM_{2.5}$	0.24	0.88
			SO_2	0.04	0.08
			VOC (combustion)	0.16	0.64
			VOC (coatings)	200.00	39.17
8E	8S	Solvent Cleaning Stations	Total VOC	0.27	1.15
			Total HAP	0.03	0.09

14E	14S	Solvent Cleaning Station	Total VOC	0.26	1.15
			Total HAP	0.01	0.01
23E	23S	Solvent Cleaning Station	Total VOC	0.26	1.15
			Total HAP	0.03	0.09
24E	24S	Emergency Generator	CO	0.16	0.04
			NO_x	1.40	0.35
			$PM/PM_{10}/PM_{2.5}$	0.08	0.02
			SO_2	0.31	0.08
			VOCs	0.39	0.10
			Total HAPs	0.01	0.01
25E	25S	Flame Laminator No.1	CO	1.56	6.82
			NO_x	0.55	2.42
			$PM/PM_{10}/PM_{2.5}$	0.59	2.57
			SO_2	0.01	0.01
			VOCs	2.03	8.89
			VOC HAPs	0.09	0.35
			Lead	0.01	0.01
			Formaldehyde	0.01	0.01
			HF	0.01	0.01
			HCN	0.33	1.45

4.1.3. **Hazardous Air Pollutants.** The facility-wide emission rate of hazardous air pollutants (HAPs) shall not exceed 9.99 tons per year of any individual HAP nor 24.99 tons per year of all aggregated HAPs based on a rolling 12 month basis.

Use of any coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP shall be in accordance with the following:

a. An estimate of emissions associated with the use of the coating shall be determined and incorporated into the record keeping requirements contained herein.

b. For the purposes of this permit, coatings shall be defined as a material applied onto, or impregnated into, a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, stains, thinners, solvents, sealers, varnishes, paints, primers, catalysts, acrylics, lacquers, and temporary protective coatings, or combinations of the above materials as applied.

4.1.4. **Toxic Air Pollutants.** No coating or solvent containing any toxic air pollutant (TAP), as defined by 45CSR27, section 2.10 shall be used without prior approval of the Director. The following are the known TAPs to be emitted from the source and the corresponding emissions limitation, calculated on a 12-month rolling total:

TAP Emissions Limit

Acrylonitrile	500 pounds per year
Benzene	1,000 pounds per year
Ethylene Oxide	500 pounds per year
Formaldehyde	1,000 pounds per year
Propylene Oxide	5,000 pounds per year
Vinyl Chloride	1,000 pounds per year
Vinylidene Chloride	2,000 pounds per year

Should the permittee exceed this limit, they shall immediately become subject to all applicable requirements of 45CSR27, including the use of Best Available Technology "BAT". **[45CSR27]**

4.1.5. Compliance with the foam production [1E & 15E] emission limits in Table 4.1.2, foam production for each of the two lines shall be determined by multiplying the VOC content of each raw material by the amount processed per month (excluding MDI). MDI emissions shall be determined using engineering calculations found in the guidance document "MDI/Polymeric MDI Emissions MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry Reporting" published by the Alliance for the Polyurethane Industry in 2004. Compliance with the annual production shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of emissions at any given time for the previous twelve (12) consecutive months.

4.1.6. Compliance with the Bun Press [2E & 18E] emission limits in Table 4.1.2, shall be determined by multiplying the VOC/HAP content of each adhesive used by the amount used per month. Said results shall then be summed for all adhesives used in a particular month. Compliance with the annual limit shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of emissions at any given time for the previous twelve (12) consecutive months.

4.1.7. Compliance with the Hot Melt Laminator [3E, 4E & 19E] emission limits in Table 4.1.2, shall be determined by multiplying the VOC/HAP content of each adhesive used by the amount used per month. Said results shall then be summed for all adhesives used in a particular month. Compliance with the annual limit shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of emissions at any given time for the previous twelve (12) consecutive months.

4.1.8. To ensure compliance with the Misting Unit [6E] emission limits in Table 4.1.2, the permittee shall limit the usage of misting agent to 200,000 pounds per year. Compliance with the annual usage shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of misting agen used at any given time for the previous twelve (12) consecutive months.

4.1.9. In order to ensure compliance with the[7E, 13E, 20E, 21E, and 22E,] emission limits in Table 4.1.2, the permittee shall comply with the following:

4.1.9.1 To ensure compliance with the Roll Coaters [13E, 20E, 21E, and 22E] combustion emission limits in Table 4.1.2, the permittee shall limit the annual fuel usage to the four (4) Dryers, combined, to 231.28 MM SCF. The fuel type shall be limited to Natural Gas. Compliance with the annual usage shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of natural gas used at any given time for the previous twelve (12) consecutive months.

4.1.9.2 Compliance with the VOC and HAP emission limits in Table 4.1.2 shall be determined by multiplying the VOC/HAP content of each coating used by the amount used per month. Said results shall then be summed for all coatings used in a particular month. Compliance with the annual limit shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of emissions at any given time for the previous twelve (12) consecutive months

4.1.10. To ensure compliance with the multiple solvent cleaning stations [8E, 14E and 23E] emission limits in Table 4.1.2, the permittee shall keep the lids to the parts washers closed when solvent is present in the system(s) and not in use.

4.1.10.1 Additionally, washing fluids used in solvent cleaning stations 8E and 23E shall contain no HAPs. Washing fluids used in solvent cleaning station 14E shall not exceed 0.6% HAP by weight.

4.1.11. The permittee shall establish and adhere to a preventive maintenance program for the Sternvent mechanical collector [1C] and baghouses [2C] that is consistent with manufacturer's recommendation to ensure the 99.9% efficiency stated in the Emissions Unit Table 1.0 of this permit. At a minimum, the preventive maintenance program shall include at what frequency or at what trigger (such as change in differential pressure) the filters are to be replaced.

4.1.12 In order to ensure compliance with the flame laminator [25E] emission limits in Table 4.1.2, the flame laminator capacity shall not exceed 11,100 square feet per hour.

4.1.13 The emergency generator shall fire only ultra low sulfur diesel fuel with a sulfur content of no greater than 0.0015% by weight.

4.1.14 The emergency generator shall not consume more than 7.84 gallons of fuel oil per hour.

4.1.15 The emergency generator shall not operate more than 500 hours per year for non emergency purposes (e.g. maintenance and testing).

4.1.16 Emissions of NO_x from the emergency generator shall not exceed 9.2 g/kw-hr. **[§60.4205(a)**

4.1.17. For the Roll Coater with Apollo Dryers [7S, 20S, 21S, 22S], the permittee shall comply with all applicable requirements of 45CSR2. The principle provision of 45CSR2 applicable to the permitted facility is:

a. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. **[45CSR-2.3.1]**

4.1.18. For the Buffer Unit [5S], the permitted facility shall comply with all applicable requirements of 45CSR7, with the exception of any more stringent limitations set forth in Table 4.1.2 of this permit. The principle provisions of 45CSR7, applicable to the permitted facility are:

a. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity; **[45CSR 7-3.1]**

b. The provisions of subsection 3.1 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period; **[45 CSR 7-3.2]**

c. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design opr operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. **[45CSR 7-5.1];**

d. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. **[45CSR 7-5.2]**

4.1.19. The roll coating operations [7S, 13S, 20S, 21S and 22S] are subject to 45CSR21§ 13 when they are in paper coating service, § 14 when they are in fabric coating service, and § 15 when they are in vinyl coating service.

a. *Exempt from Emission Limits.* If the actual emissions without control devices for all paper coating operations, fabric coating operations, or vinyl coating operations at the facility are less than 15 pounds VOC's per day, the permittee shall comply with the certification, recordkeeping, and reporting requirements of 45CSR21 §13.7..a, § 14.7a, or § 15.7.a.. **[45CSR21§§ 13.1.b, 14.1.b, and 15.1.b]**

b. If the actual emissions without control devices for all fabric coating operations at the facility are equal to or greater than 15 pounds VOC's per day, the permittee shall comply with the following:

i. *Complying Coatings.* No owner or operator of a paper coating operation or fabric coating operation subject to section 13 or 14 of 45CSR21, shall cause or allow the application of any coating on that operation with VOC content in excess of 2.9 lb/gal of coating, minus water and exempt compounds, as applied. No owner or operator of a vinyl coating operation subject to section 15 of 45CSR21, shall cause or allow the application of any coating on that operation with VOC content in excess of 3.8 lb/gal of coating, minus water and exempt compounds, as applied. **[45CSR21§§ 13.3.a, 14.3.a, and 15.3.a]**

ii. As an alternative to compliance with the emission limit in sections 13.3.a, 14.3.a, or 15.3.a of 45CSR21, an owner or operator of a paper, fabric, or vinyl coating operation subject to section 13, 14, or 15 of 45CSR21 may meet the requirements of section 13.4, 14.4, or 15.4 or 13.5, 14.5, or 15.5 of 45CSR21. **[45CSR21§§ 13.3.b, 14.3.b, and 15.3.b]**

iii. *Daily-weighted average Limitation.* No owner or operator of a paper, fabric, or vinyl coating operation subject to this sections 13, 14, or 15 of 45CSR21, shall apply coatings on that operation, during any day, whose daily-weighted average VOC content, calculated in accordance with the procedure specified in section 43 of 45CSR21, exceeds the emission limit in sections 13.3.a, 14.3.a, or 15.3.a of 45CSR21. **[45CSR21§§ 13.4, 14.4, and 15.5]**

iv. *Control Devices.* An owner or operator of a paper, fabric, or vinyl coating operation subject to sections 13, 14, or 15 of 45CSR21, shall comply with this by:

(a) Installing and operating a capture system on that operation;

(b) Installing and operating a control device on that operation;

(c) Determining for each day the overall emission reduction efficiency needed to demonstrate compliance. The overall emission reduction needed for a day is the lesser of the value calculated according to the procedure in section 43.2 of 45CSR21 for that day or 95 percent; and

(d) Demonstrating each day that the overall emission reduction efficiency achieved for that day, as determined in section 44.3 of 45CSR21, is greater than or equal to the overall emission reduction efficiency required for that day. **[45CSR21§§ 13.5, 14.5, and 15.5]**

v. *Test Methods.* Test methods found in sections 41 through 44 of 45CSR21 shall be used to determine compliance with section 13, 14, or 15 of 45CSR21 for paper, fabric, or vinyl coating operations. **[45CSR21§§ 13.6, 14.6, and 15.6]**

4.1.20. *Handling, Storage, and Disposal of Volatile Organic Compounds (VOCs).*

1. No owner or operator of a facility subject to the requirements of sections 13, 14, or 15 of 45CSR21 shall cause, allow, or permit the disposal of any volatile organic compound (VOC), or of any materials containing any VOC, at that facility in any 1 ay in a manner that would permit the evaporation of more than 15 pounds of VOC into the ambient air. This provision does not

apply to coating sources that are specifically exempt from the emission limitations of sections 13, 14, or 15. **[45CSR21 § 8.1]**

2. No owner or operator of a facility subject to this section 8 of 45CSR21, shall use open containers for the storage or disposal of cloth or paper impregnated with VOCs that are used for surface preparation, cleanup, or coating removal. **[45CSR21 § 8.2]**

3. No owner or operator of a facility subject to this section 8 of 45CSR21, shall store in open containers spent or fresh VOCs to be used for surface preparation, cleanup or coating removal. **[45CSR21 § 8.3]**
4. No owner or operator of a facility subject to this section 8 of 45CSR21, shall use VOCs for the cleanup of spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere. **[45CSR21 § 8.4]**

4.1.21. The permittee is subject to the slabstock flexible polyurethane foam production requirements of 40 CFR 63, subpart OOOOOO for the production of flexible polyurethane foam. The foam production units [1S and 9S], the ISO tanks [10S], and the Glycol tanks [11S] are subject to the applicable "existing" affected source requirements. **[§ 63.11414; GACT, Subpart OOOOOO]**

i. If you own or operate a new or existing slabstock polyurethane foam production affected source, you must comply with the requirements in either paragraph (1) or (2) of this section.

1. Comply with §63.1293(a) or (b) of subpart III, except that you must use Equation 1 of this section to determine the HAP auxiliary blowing agent (ABA) formulation limit for each foam grade instead of Equation 3 of §63.1297 of subpart III. You must use zero as the formulation limitation for any grade of foam where the result of the formulation equation (using Equation 1 of this section) is negative (i.e., less than zero):

$$ABA_{limit} = 0.2\ (IFD) - 19.1\ (1/IFD) - 15.3\ (DEN) - 6.8\ (1/DEN) + 36.5 \quad \text{(Equation 1)}$$

Where:
ABA_{limit} = HAP ABA formulation limitation, parts methylene chloride ABA allowed per hundred parts polyol (pph).
IFD = Indentation force deflection, pounds.
DEN = Density, pounds per cubic foot.

2. Use no material containing methylene chloride for any purpose in any slabstock flexible foam production process.
[§ 63.11416(b); GACT, Subpart OOOOOO]

ii. You many demonstrate compliance with the above requirement using adhesive usage records, Material Safety Data Sheets, and engineering calculations.
[§ 63.11416(f); GACT, Subpart OOOOOO]

iii. Each owner or operator of a new or existing slabstock flexible polyurethane foam production affected source who chooses to comply with §63.11416(b)(1) must comply with paragraph (1) of this section. Each owner or operator of a new or existing slabstock flexible polyurethane foam production affected source who chooses to comply with §63.11416(b)(2) must comply with paragraphs (2) and (3) of this section.

1. You must comply with paragraphs (1)(i) through (v) of this section.

(i) The monitoring requirements in §63.1303 of subpart III.
(ii) The testing requirements in §63.1304 or §63.1305 of subpart III.
(iii) The reporting requirements in §63.1306 of subpart III, with the exception of the reporting requirements in §63.1306(d)(1), (2), (4), and (5) of subpart III.
(iv) The recordkeeping requirements in §63.1307 of subpart III, with the exception of

the recordkeeping requirements in §63.1307(a)(1), (b)(1)(i), and (b)(2).

(v) The compliance demonstration requirements in §63.1308(a), (c), and (d) of subpart III.

2. You must submit a notification of compliance status report no later than 180 days after your compliance date. The report must contain this certification of compliance, signed by a responsible official, for the standards in §63.11416(b)(2): "This facility uses no material containing methylene chloride for any purpose on any slabstock flexible foam process."

3. You must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). You must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site. **[§ 63.11417(b); GACT, Subpart OOOOOO]**

iv. The permittee is subject to the general provisions of supbart A as specified in Table 1 of subpart OOOOOO. **[§ 63.11418; GACT, Subpart OOOOOO]**

4.1.22. The permittee is subject to the the flexible polyurethane foam fabrication requirements of 40 CFR 63, subpart OOOOOO for the fabrication operations. The bun press [2S] is subject to the applicable "existing" affected source requirements. The hot melt laminators [3S, 4S and 19S], and the roll coaters [7S, 13S, 20S, 21S and 22S] are subject to the "new" affected source requirements. **[§63.11414; GACT, Subpart OOOOOO]**

i. If you own or operate a new or existing flexible polyurethane foam fabrication affected source, you must not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. **[§ 63.11416(e); GACT, Subpart OOOOOO]**

ii. You many demonstrate compliance with the above requirement using adhesive usage records, Material Safety Data Sheets, and engineering calculations. **[§ 63.11416(f); GACT, Subpart OOOOOO]**

4.1.23. The loop splitters used in the fabrication process are subject to the compliance requirements of 40 CFR 63, subpart OOOOOO for loop splitters.

i. You must have a compliance certification on file by the compliance date. This certification must contain the statements in paragraph (3) of this section, as applicable, and must be signed by a responsible official.

1. *Reserved*
2. *Reserved*
3. For a flexible polyurethane foam fabrication affected source containing a loop slitter: "This facility does not use any adhesive containing methylene chloride on a loop slitter process in accordance with §63.11416(e)." **[§ 63.11417(c); GACT, Subpart OOOOOO]**

ii. For flexible polyurethane foam fabrication affected sources containing a loop slitter, you must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). You must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site. **[§ 63.11417(d); GACT, Subpart OOOOOO]**

iii. You many demonstrate compliance with the above requirement using adhesive usage records, Material Safety Data Sheets, and engineering calculations. **[§ 63.11416(f); GACT, Subpart OOOOOO]**

4.1.24. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control

practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

4.2.1. For the purpose of determining compliance with the opacity limits of 45CSR2-3.1 and section 4.1.17 of this permit, the permittee shall conduct visible emission checks and/or opacity monitoring and record keeping for all emission sources subject to an opacity limit.

a. The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

b. Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during appropriate weather conditions.

c. If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

4.3. Testing Requirements

4.3.1. *Daily-weighted average.* To demonstrate compliance with 4.1.19.b.iii, 4.4.13, and 4.5.7 of this permit, the daily weighted average VOC content, in units of mass of VOC per unit volume of coating, minus water and exempt compounds, as applied, of the coatings used on a day on a coating line or operation shall be calculated using the following equation:

$$VOCW = \frac{\sum_{i=1}^{n} V_i C_i}{V_T}$$

where:

VOCw = The daily-weighted average VOC content of the coatings, as applied, used on a coating line or operation in units of kilograms of VOC per liter of coating (kg VOC/L) (pounds of VOC per gallon of coating [lb VOC/gal]), minus water and exempt compounds;

n = The number of different coatings, as applied, each day on a coating line or operation;

Vi = The volume of each coating, as applied, each day on a coating line or operation in units of L (gal), minus water and exempt compounds; and

Ci = The VOC content of each coating, as applied, each day on a coating line or operation in units of kg VOC/L of coating (lb VOC/gal), minus water and exempt compounds; and

VT = The total volume of all coating, as applied, each day on a coating line or operation in units of L (gal), minus water and exempt compounds.
[45CSR21 §43.1]

4.3.2. *Control Systems.* To demonstrate compliance with 4.1.19.b.iii and 4.1.19.b.iv.c of this permit, the overall emission reduction efficiency needed to demonstrate compliance is determined each day as

follows:

a. Obtain the emission limitation from the applicable section of this regulation.
b. Calculate the emission limitation on a solids basis according to the following equation:

$$S = \frac{C}{1 - (C/d)}$$

where:
S = The VOC emission limitation in terms of kg VOC/L of coating solids (lb VOC/gal);
C = The VOC emission limitation in terms of kg VOC/L of coating (lb/gal), minus water and exempt compounds; and
d = The density of VOC for converting emission limitation to a solids basis. The density equals 0.882 kg/L (7.36 lb/gal).

c. Calculate the required overall emission reduction efficiency of the control system for the day according to the following equation:

$$E = ((VOCa - S)/VOCa) \times 100$$

where:
E = The required overall emission reduction efficiency of the control system for the day;
VOCa =
(1) The maximum VOC content of the coatings, as applied, used each day on the subject coating line or operation, in units of kg VOC/L of coating solids (lb/gal), as determined by the applicable test methods and procedures specified in section 42.; or (2) The daily-weighted average VOC content, as applied, of the coatings used each day on the subject coating line or operation, in units of kg VOC/L of coating solids (lb/gal), as determined by the applicable test methods and procedures specified in section 42. and the procedure in section 43.2.d.; and
S = VOC emission limitation in terms of kg VOC/L of coating solids (lb VOC/gal).

d. The daily-weighted average VOC content, as applied, of the coatings used on a coating line or operation in units of mass of VOC per unit volume of coating solids shall be calculated by the following equation:

$$\text{VOC WS} = \frac{\sum_{i=1}^{n} W_{VOCi} D_i}{\sum_{i=1}^{n} V_i VS_i}$$

where:
VOCws = The daily-weighted average VOC content, as applied, of the coatings used on a coating line or operation in units of mass of VOC per unit volume of coating solids;
n = The number of different coatings, as applied, used in a day on a coating line or operation;
Vi = The volume of each coating (i), as applied, used in a day on a coating line or operation in units of liters (L) (gallons [gal]);
Wvoci =
The weight fraction of VOC in each coating (i), as applied, used in a day on a coating line or operation in units of kg VOC/kg coating (lb/lb);
Di = The density of each coating (i), as applied, used in a day on a coating line or operation in units of kg coating/L of coating (lb/gal);
Vsi = The volume fraction solids content of each coating (i), as applied, used on a day on a coating line or operation in units of L solids/L coating (gal/gal);
[45CSR21 §43.2]

4.3.3. To demonstrate compliance with for 4.1.19.b.iv.d of this permit, the permittee shall determine the overall emission reduction efficiency of the emission control system each day as the product of the capture efficiency and the control device destruction or removal efficiency. The results of the capture efficiency test and control device destruction or removal efficiency test remain valid for each day until a subsequent test is performed. The results of any valid test may be used for each day until superseded by the results of a valid test subsequently performed. **[45CSR21 § 44.3]**

4.3.4. *General Provisions*. To demonstrate compliance with 4.1.19.b.v of this permit, the permittee shall comply with the applicable general provisions of the test methods and compliance procedures of § 45-21-41 and that are provided below:

1. *Test methods.* The owner or operator of any volatile organic compound (VOC) source required to comply with sections 11. through 40. shall, at the owner's or operator's expense, demonstrate compliance by using the methods of sections 41. through 47. or alternative methods that are approved by the Director and the U.S. EPA and shall meet all the requirements of this section 41.

2. *Preparation of test plan and quality assurance program.* At least 30 days before the initiation of a required test under section 44., the owner or operator shall submit a test plan that shall be approved by the Director before the results of the test will be considered acceptable. This test plan shall include the following minimum information:

   a. The purpose of the proposed test and the applicable section of sections 11. through 40. of this regulation;
   b. A detailed description of the facility to be tested, including a line diagram of the facility, locations of test sites, and facility operation conditions for the test;
   c. A detailed description of the test methods and procedures, equipment, and sampling sites, i.e., a test plan;
   d. A time table for the following:

      1. Date for the compliance test;
      2. Date of submittal of preliminary results to the Director (not later than 30 days after sample collection); and
      3. Date of submittal of final test report (not later than 60 days after completion of on-site sampling); and

   e. Proposed corrective actions should the test results show noncompliance.

   f. Internal QA program. -- The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision. An example of internal QA is the sampling and analysis of replicable samples.

   g. External QA program.

      1. The external QA program shall include, at a minimum, application of plans for a test method performance audit (PA) during the performance test.
      2. The external QA program may also include systems audits, which include the opportunity for on-site evaluation by the Director of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities.
      3. The PA's shall consist of blind audit samples provided by the Director and analyzed during the performance test to provide a measure of test data bias.

         A. The Director shall require the owner or operator to analyze PA samples during each performance test when audit samples are available.
         B. Information concerning the availability of audit materials for a specific performance test may be obtained by contacting the Emission Measurement Technical Information Center at (919) 541-2237.
         C. If the Director has prior knowledge that an audit material is available, he or she may

contact the Atmospheric Research and Exposure Assessment Laboratory directly at (919)541-4531.

D. All other audit materials may be obtained by calling (919) 541-7834.

E. The evaluation criteria applied to the interpretation of the PA results and the subsequent remedial actions required of the owner or operator are the sole responsibility of the Director.

3. *Process operation.* The owner or operator shall be responsible for providing:

   a. Sampling ports, pipes, lines, or appurtenances for the collection of samples and data required by the test methods and procedures;
   b. Safe access to the sample and data collection locations; and
   c. Light, electricity, and the utilities required for sample and data collection.

4. *Summary of results.* No later than 30 days after the sample collection, the owner or operator shall submit preliminary results to the Director.

5. *Final report.* No later than 60 days after completion of the on-site sampling, the owner or operator shall submit a test report to the Director. The test report shall include the following minimum information:

   a. Process description;
   b. Air pollution capture system and control device description;
   c. Process conditions during testing;
   d. Test results and example calculations;
   e. Description of sampling locations and test methods;
   f. Quality assurance measures; and
   g. Field and analytical data.
   [45CSR21§ 41]

4.3.5. *Determining the Volatile Organic Compound (VOC) Content of Coatings and Ink.* To demonstrate compliance with 4.1.19.b.v of this permit, the permittee shall follow the applicable test methods and compliance procedures of § 45-21-42 and provided below.

1. *Sampling Procedures.* Sampling procedures shall follow the guidelines presented in:

   a. ASTM D3925: Standard practice for sampling liquid paints and related pigment coatings; or
   b. ASTM E300: Standard practice for sampling industrial chemicals.

2. *Analytical Methods.* The analytical methods specified below shall be used to determine the VOC content of each coating, as applied:

   a. Method 24 of 40 CFR Part 60, Appendix A, shall be used in the determination of total volatile content, water content, and density of coatings. For the determination of total volatile content, all samples shall be oven-dried at 100EC for 1 hour.
   b. To determine the total volatile content, water content, and density of multi-component coatings, the following procedures shall be used in addition to Method 24 of 40 CFR Part 60, Appendix A:

      1. The components shall be mixed in a storage container in proportions the same as those in the coating, as applied. The mixing shall be accomplished by weighing the components in the proper proportion into a container which is closed between additions and during mixing. Approximately 100 ml of coating shall be prepared in a container just large enough to hold the mixture prior to withdrawing a sample.

      2. For determination of volatile content, a sample shall be withdrawn from the mixed

coating, and then transferred to a dish where the sample shall stand for at least 1 hour, but no more than 24 hours prior to being oven dried at 110EC for 1 hour.

3. For determination of the water content and density of multi-component coatings, samples shall be taken from the same 100 ml mixture of coating and shall be analyzed by the appropriate ASTM method referenced in Method 24 of 40 CFR Part 60, Appendix A.

c. Method 24A of 40 CFR Part 60, Appendix A, shall be used in the determination of total volatile content, water content, and density of any publication rotogravure printing ink and related coatings.

d. The following ASTM method may be used as an additional procedure related to determining VOC: ASTM D4457-85 - Standard test method for determination of dichloromethane and 1,1,1, trichloroethane in paints and coatings by direct injection into a gas chromatograph (the procedure delineated above may be used to develop protocols for any compounds specifically exempted from the definition of VOC).

3. *Use of adaptations to test methods.* Use of an adaptation to any of the analytical methods specified in section 42.2. may be approved by the Director and the U.S. EPA on a case-by case basis. An owner or operator shall submit sufficient documentation for the Director and the U.S. EPA to find that the analytical methods specified in sections 42.2.a., 42.2.b., and 42.2.c. will yield inaccurate results and that the proposed adaptation is appropriate.

4. *Samples.* Each sample collected for analysis shall meet the following criteria:

a. Each sample shall be at least 1 pint taken into a 1-pint container at a location and time such that the sample will be representative of the coating or ink, as applied (i.e., the sample shall include any dilution solvent or VOC added during the manufacturing process);
b. If a sample larger than 1 pint is obtained, the sample container shall be of a size such that the sample completely fills the container;
c. The container shall be tightly sealed immediately after the sample is taken;
d. Any solvent or other VOC added after the sample is taken shall be measured and accounted for in the calculations in section 42.3.; and
e. For multiple-component coatings, separate samples of each component shall be obtained.

5. *Calculations.* Calculations for determining the VOC content of coatings and inks from data as determined by Method 24 or 24A of 40 CFR Part 60, Appendix A, shall follow the guidance provided in the following documents:

a. "A Guideline for Surface Coating Calculations", EPA-340/1-86-016; and
b. "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink and Other Coatings", (Revised June 1986) EPA-450/3-84-019.
[45CSR21§ 42]

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. To demonstrate compliance with the hazardous air pollutant emission limits set forth in 4.1.3 and 4.1.4, and the VOC emission limits for the roll coating machines [7S, 13S, 20S, 21S and 22S] established in table 4.1.2 of this permit, the permittee shall maintain monthly and annual records for coatings that are used on the roll coating machines that include the following information:

a. The name or identification of each coating used;

b. The mass of VOC and HAP of each coating; and

c. The volume of each coating used each month.

The permittee shall maintain a summary report for the facility that includes monthly and annual emission rates for aggregate HAPs and speciated HAPs. Annual records shall be maintained on a 12-month rolling total basis. If the annual aggregate emission rates are less than 10 tons of HAPs, the reporting for speciated HAPs is not required.

4.4.5. To demonstrate compliance with the production limit set forth in section 4.1.5 of this permit, the permittee shall maintain monthly and annual production records. Annual records shall be maintained on a 12-month rolling total basis.

4.4.6. To demonstrate compliance with the usage limits set forth in sections 4.1.6, 4.1.7, and 4.1.8 of this permit and the emission limit for [1E and 9E] set forth in Table 4.1.2, the permittee shall maintain records indicating the amount of ISO purchased, V-4055 purchased, hot melt laminator glue purchased, the amount of misting agent purchased, and the amount of PF4211 purchased. Annual usage records shall be maintained on a 12-month rolling total basis.

4.4.7. To demonstrate compliance with the natural gas usage limit established in section 4.1.9.1 of this

permit, the permittee shall maintain records of the fuel usage. Annual records shall be maintained on a 12-month rolling total basis.

4.4.8 To demonstrate compliance with the HAP content limits established in section 4.1.10.1 of this permit, the permittee shall maintain records of washing fluid HAP content.

4.4.9. To demonstrate compliance with the maintenance requirements established in section 4.1.11 of this permit, the permittee shall maintain records indicating all maintenance that has been performed on the mechanical collector and baghouses. At a minimum the records shall include the date that the maintenance was preformed and shall include all filter changes that were made.

4.4.10. The permittee shall maintain records of all monitoring data required by section 4.1.17 of this permit documenting the date and time of each visible emission check, the emission point or equipment / source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). An example form is supplied as Appendix A. Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

4.4.11 In order to determine compliance with the emergency generator requirements of conditions 4.1.13, 4.1.14, 4.1.15 and 4.1.16 of this permit the permittee shall monitor the following:

4.4.11.1 In order to determine compliance with the fuel sulfur limits of 4.1.13 of this permit the permittee shall monitor fuel sulfur content of the fuel oil combusted by the emergency generator. In lieu of this monitoring, the permittee may maintain onsite a valid purchase contract, tariff sheet or transportation contract guaranteeing that the maximum sulfur content of the fuel is not greater than 0.0015% by weight.

4.4.11.2 In order to determine compliance with the operating limits of 4.1.15 of this permit, the permittee shall monitor the emergency generator operating time.

4.4.11.3 In order to determine compliance with the emission limitations of 4.1.16 of this permit, the permittee shall only use an emergency generator certified by the manufacturer to meet those emission limitations.

4.4.12. *Emissions Exception.* To demonstrate compliance with the exempt from emissions requirement 4.1.14.a of this permit, the permittee shall collect and record all of the following information for the roll coating machines [7S, 13S, 20S, 21S and 22S] each day and maintain the information at the facility for a period of 3 years:

1. Indication if the machine is in paper, fabric, or vinyl coating service that day;
2. If the machine is in paper, fabric, or vinyl coating service that day, the name and identification number of each coating, as applied;
3. If the machine is in paper, fabric, or vinyl coating service that day, the mass of VOC per volume (minus water and exempt compounds) and the volume of coating (minus water and exempt compounds), as applied, used each day; and
4. If the machine is in paper, fabric, or vinyl coating service that day, the total VOC emissions at the facility, as calculated using the equation in section 4.2.a.4 of 45CSR21.

[45CSR21 §§ 13.7.a, 14.7.a, 15.7.a, and 4.2.b]

4.4.13. *Complying Coatings.* To demonstrate compliance with the complying coatings requirement 4.1.14.b.i of this permit, the permittee shall collect and record all of the following information each day for each roll coating machines[7S, 13S, 20S, 21S, and 22S] in paper, fabric, or vinyl coating service on and after the initial startup date and maintain the information at the facility for a period of 3 years:

1. Indication if the machine is in paper, fabric, or vinyl coating service that day;
2. If the machine is in paper, fabric, or vinyl coating service that day, the name and identification number of each coating, as applied on each coating line or operation; and
3. If the machine is in paper, fabric, or vinyl coating service that day, the mass of VOC per volume (minus water and exempt compounds) and the volume of coating (minus water and exempt compounds), as applied, used each day on each paper, fabric, or vinyl coating line or operation.

[45CSR21 §§ 13.7.b, 14.7.b, 15.7.b, and 4.3.b]

4.4.14. *Daily-Weighted Averaging.* To demonstrate compliance with the daily-weighted averaging requirement 4.1.14.b.iii of this permit, the permittee shall collect and record all of the following information each day for each roll coating machines[7S, 13S, 20S, 21S, and 22S] in paper, fabric, or vinyl coating service on and after the initial startup date and maintain the information at the facility for a period of 3 years:

1. Indication if the machine is in paper, fabric, or vinyl coating service that day;
2. If the machine is in paper, fabric, or vinyl coating service that day, the name and identification number of each coating, as applied on each coating line or operation; and
3. If the machine is in paper, fabric, or vinyl coating service that day, the mass of VOC per volume (minus water and exempt compounds) and the volume of coating (minus water and exempt compounds), as applied, used each day on each coating line or operation; and
4. The daily-weighted average VOC content of all coatings, as applied, on each paper, fabric, or vinyl coating line or operation calculated according to the procedure in 45CSR21 § 43.1.

[45CSR21 §§ 13.7.c, 14.7.c, 15.7.c, and 4.4.b]

4.4.15. *Control Devices.* To demonstrate compliance with the control device requirement 4.1.19.b.iv of this permit, the permittee shall collect and record all of the following information each day for each roll coating machines[7S, 13S, 20S, 21S and 22S] in paper, fabric, or vinyl coating service on and after the initial startup date and maintain the information at the facility for a period of 3 years:

1. Indication if the machine is in paper, fabric, or vinyl coating service that day;
2. If the machine is in paper, fabric, or vinyl coating service that day, the name and identification number of each coating, as applied on each coating line or operation; and
3. If the machine is in paper, fabric, or vinyl coating service that day, the mass of VOC per volume (minus water and exempt compounds) and the volume of coating (minus water and exempt compounds), as applied, used each day on each coating line or operation;
4. The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating line or operation;
5. The required overall emission reduction efficiency for each day for each coating line or operation as determined in section14.5.c of 45CSR21.;
6. The actual overall emission reduction efficiency achieved for each day for each coating line or operation as determined in section 45CSR21 § 44.3.;
7. Control device monitoring data;
8. A log of operating time for the capture system, control device, monitoring equipment, and the associated coating line or operation;
9. A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages;
10. For thermal incinerators, all 3-hour periods of operation in which the average combustion temperature was more than 28°C (50°F) below the average combustion temperature during the most recent performance test that demonstrated that the facility was in compliance;
11. For catalytic incinerators, all 3-hour periods of operation in which the average temperature of the process vent stream immediately before the catalyst bed is more than 28°C (50°F) below the average temperature of the process vent stream during the most recent performance test that demonstrated that the facility was in compliance; and
12. For carbon adsorbers, all 3-hour periods of operation during which the average VOC concentration or reading of organics in the exhaust gases is more than 20 percent greater than the

average exhaust gas concentration or reading measured by the organics monitoring device during the most recent determination of the recovery efficiency of the carbon adsorber that demonstrated that the facility was in compliance.
[45CSR21 §§ 13.7.d, 14.7.d, 15.7.d, and 4.5.b]

4.5. Reporting Requirements

4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation using (40CFR Part 60, Appendix A, Method 9) must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

4.5.2. The permittee shall submit, upon request by the Director, records that the document that the source is exempt from the emission limitations of 45CSR21-40.3.

a. These records shall be submitted to the Director within 30 days from the date of request.

b. If such records are not made available, the source will be considered subject to the limits in 45CSR21-40.3.
[45CSR21-40.6b]

4.5.3. *Emissions Exemption Certification.* To demonstrate compliance with 4.1.19.a of this permit, the permittee shall certify to the Director that the facility is exempt by providing the following:

1. Name and location of the facility;
2. Address and telephone number of the person responsible for the facility;
3. A declaration that the facility is exempt from the emission limitations of section 13, 14, or 15 of 45CSR21 because combined VOC emissions from all paper, fabric, or vinyl coating lines and operations at the facility are below the applicability threshold before the application of capture systems and control devices; and
4. Calculations of the daily-weighted average that demonstrate that the combined VOC emissions from all coating lines and operations at the facility for a day representative of current maximum production levels are 15 pounds or less before the application of capture systems and control devices. The following equation shall be used to calculate total VOC emissions for that day:

$$T = \sum_{i=1}^{n} A_i B_i$$

where:

T = Total VOC emissions from coating lines and operations at the facility before the application of capture systems and control devices in units of lb/day;
n = Number of different coatings applied on each coatings applied on each fabric coating line or each fabric coating operation at the facility;
i = Subscript denoting an individual coating;
A_i = Mass of VOC per volume of coating (i) (minus water and exempt compounds), as applied, used at the facility in units of pounds VOC per gallon; and
B_i = Volume of coating (i) ((minus water and exempt compounds), as applied, used at the facility in units of gallons per day). The instrument or method by which the permittee accurately measured or calculated the volume of each coating, as applied, used shall be described in the certification to the Director.
[45CSR21 §§ 13.7.a, 14.7.a, 15.7.a, and 4.2.a]

4.5.4. To demonstrate compliance with 4.1.19.a of this permit, the permittee shall notify the Director of any record showing that combined VOC emissions from all paper, fabric, or vinyl coating lines and operations at the facility exceed 15 pounds on any day, before the application of capture systems and

control devices. A copy of such record shall be sent to the Director within 30 days after the exceedance occurs. **[45CSR21 §§ 13.7.a, 14.7.a, 15.7.a, and 4.2.c]**

4.5.5. *Complying Coating Certification.* To demonstrate compliance with 4.1.19.b.i of this permit using complying coatings, the permittee shall upon startup of a new paper, fabric, or vinyl coating line or operation, or upon changing the method of compliance for an existing coating line or operation from daily-weighted averaging or control devices to the use of complying coatings, the permittee shall certify to the Director that the coating line or operations is or will be in compliance with the requirements of section 14 of 45CSR21 on and after the initial startup date. Such certification shall include:

1. The name and location of the facility;
2. The address and telephone number of the person responsible for the facility;
3. Identification of subject sources;
4. The name and identification number of each coating, as applied, on each coating line or operation;
5. The mass of VOC per volume (minus water and exempt compounds) and the volume of each coating (minus water and exempt compounds), as applied; and
6. The time at which the facility's "day" begins if a time other than midnight local time is used to define a "day".

[45CSR21 §§ 13.7.b, 14.7.b, 15.7.b, and 4.3.a]

4.5.6. *Complying Coating.* To demonstrate compliance with 4.1.19.b.i of this permit, the permittee shall notify the Director in the following instances:

1. Any record showing use of any non-complying coatings shall be reported by sending a copy of such record to the Director within 30 days following that use; and

2. At least 30 calendar days before changing the method of compliance from the use of complying coatings to daily-weighted averaging or control devices, the permittee shall comply with all requirements of section 4.4.a or 4.5.a of 45CSR21 respectively. Upon changing the method of compliance from the use of complying coatings to daily-weighted averaging or control devices, the permittee shall comply with all requirements of section 14 of 45CSR21 applicable to the fabric coating line or operation referenced in section 4.3.

[45CSR21 §§ 14.7.b and 4.3.c]

4.5.7. *Daily-Weighted Averaging.* To demonstrate compliance with 4.1.19.b.iii of this permit using daily-weighted averaging, the permittee shall upon startup of a new paper, fabric, or vinyl coating line or operation, or upon changing the method of compliance for an existing coating line or operation from complying coatings or control devices to the use of daily-weighted averaging, the permittee shall certify to the Director that the coating line or operations is or will be in compliance with the requirements of section 14 of 45CSR21 on and after the initial startup date. Such certification shall include:

1. The name and location of the facility;
2. The address and telephone number of the person responsible for the facility;
3. Identification of subject sources;
4. The name and identification number of each coating line or operation which will comply by means of daily-weighted averaging;
5. The instrument or method by which the owner or operator will accurately measure or calculate the volume of each coating (minus water and exempt compounds), as applied, used each day on each coating line or operation;
6. The method by which the permittee will create and maintain records each day as required in section 4.4.b of 45CSR21;
7. An example of the format in which the records required in section 4.4.b of 45CSR21 will be kept;
8. Calculation of the daily-weighted average, using the procedure in section 43.1 of 45CSR21, for a day representative of current or projected maximum production levels; and
9. The time at which the facility's "day" begins if a time other than midnight local time is used to

define a "day".
[45CSR21 §§ 13.7.c, 14.7.c, 15.7.c, and 4.4.a]

4.5.8. *Daily-Weighted Averaging.* To demonstrate compliance with 4.1.19.b.iii of this permit, the permittee shall notify the Director in the following instances:

1. Any record showing noncompliance with the applicable daily-weighted average requirements shall be reported by sending a copy of the record to the Director within 30 dys following the occurrence, except as provided in section 9.3 of 45CSR21, as shown below:

   If the provisions of this regulation cannot be satisfied due to repairs made as the result of routine maintenance or in response to the unavoidable malfunction of equipment, the Director may permit the owner or operator of a source subject to this regulation to continue to operate said source for periods not to exceed 10 days upon specific application to the Director. Such application shall be made prior to the making of repairs and, in the case of equipment malfunction, within 24 hours of the equipment malfunction. Where repairs will take in excess of 10 days to complete, additional time periods may be granted by the Director. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. During such time periods, the owner or operator shall take all reasonable and practicable steps to minimize VOC emissions.

2. At least 30 calendar days before changing the method of compliance from the use of daily-weighted averaging to the use of complying coatings or control devices, the permittee shall comply with all requirements of section 4.3.a or section 4.5.a respectively. Upon changing the method of compliance from the use of daily-weighted averaging to the use of complying coatings or control devices, the permittee shall comply with all requirements of section 14 of 45CSR21 applicable to the paper, fabric, or vinyl coating line or operation referenced in section 4.4 of 45CSR21. **[45CSR21 §§ 13.7.c, 14.7.c, 15.7.c, and 4.4.c]**

4.5.9. *Control Devices.* To demonstrate compliance with 4.1.19.b.iv of this permit, the permittee shall notify the Director in the following instances:

1. Any record showing noncompliance with the applicable requirements for control devices shall be reported by sending a copy of the record to the Director within 30 days following the occurrence, except as provided in section 9.3 of 45CSR21, as shown below:

   If the provisions of this regulation cannot be satisfied due to repairs made as the result of routine maintenance or in response to the unavoidable malfunction of equipment, the Director may permit the owner or operator of a source subject to this regulation to continue to operate said source for periods not to exceed 10 days upon specific application to the Director. Such application shall be made prior to the making of repairs and, in the case of equipment malfunction, within 24 hours of the equipment malfunction. Where repairs will take in excess of 10 days to complete, additional time periods may be granted by the Director. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. During such time periods, the owner or operator shall take all reasonable and practicable steps to minimize VOC emissions.

2. At least 30 calendar days before changing the method of compliance from control devices to the use of daily-weighted averaging or complying coatings, the permittee shall comply with all requirements of section 4.3.a or section 4.4.a respectively. Upon changing the method of compliance from the use of control devices to the use of complying coatings or daily-weighted averaging, the permittee shall comply with all requirements of section 14 of 45CSR21 applicable to the paper, fabric, or vinyl coating line or operation referenced in section 4.5 of 45CSR21. **[45CSR21 §§ 13.7.d, 14.7.d, 15.7.d, and 4.5.d]**

4.5.10. *Control Devices.* Paper, fabric, or vinyl coating sources complying with 45CSR21 § 14 by means of control devices shall upon startup of a new paper, fabric, or vinyl coating line or operation, or upon

changing the method of compliance for an existing coating line or operation from the use of complying coatings or daily-weighted averaging to control devices, the permittee shall perform a compliance test. Testing shall be performed pursuant to the procedures in sections 41 through 44 of 45CSR21. The permittee shall submit to the Director the results of all tests and calculations necessary to demonstrate that the subject coating line or operation is or will be in compliance with the applicable sections of 45CSR21 on or after the initial startup date. **[45CSR21 §§ 13.7.d, 14.7.d, 15.7.d, and 4.5.a]**

APPENDIX A

Weekly/ Monthly/Quarterly] Opacity Record
Rubberlite Incorporated; Huntington Facility
COMPANY ID NO. 011-00174
PERMIT NO. R13-2948

Date of Observation:

Data Entered by:

Reviewed by:

Date Reviewed:

Describe the General Weather Conditions:

Stack ID/Vent ID/ Emission Point ID	Stack/Vent/Emission Point Description	Time of Observation	Visible Emissions? Yes/No	Consecutive Months of Visual Emissions	Comments

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] (please use blue ink) _____ Responsible Official or Authorized Representative _____ Date

Name and Title (please print or type) _____ Name _____ Title

Telephone No. _____ Fax No. _____

[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.