

Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: CDI, LLC
Facility Location: 305 Nerem Drive South
Forest City, Iowa 50436

Air Quality Operating Permit Number: 06-TV-004-M001
Expiration Date: August 17, 2011
Permit Renewal Application Deadline: February 17, 2011

EIQ Number: 92-6912
Facility File Number: 95-01-012

Responsible Official

Name: David L. Nagle
Title: General Manager
Mailing Address: 305 Nerem Drive South, Forest City, Iowa 50436
Phone #: (641) 585-5900

Permit Contact Person for the Facility

Name: David L. Nagle
Title: General Manager
Mailing Address: 305 Nerem Drive South, Forest City, Iowa 50436
Phone #: (641) 585-5900

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit. This facility and Winnebago Industries, Inc. - Forest City (Plant No. 95-01-001) are considered one stationary source. Two Title V Permits **have been** issued for the two facilities. This permit is for CDI, LLC, and another permit has **been** issued for Winnebago Industries, Inc. - Forest City (Permit No. 05-TV-002-M002.)

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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Abbreviations

acfm.....	Actual cubic feet per minute
BACT.....	Best Available Control Technology
CE.....	control equipment
CEM.....	continuous emission monitor
CFR.....	Code of Federal Regulations
DAC.....	De-Butanized Aromatic Concentrate
EIQ.....	Emissions inventory questionnaire
EP.....	emission point
EU.....	emission unit
°F.....	Degrees Fahrenheit
gr./dscf.....	Grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
kg.....	kilogram
lb./hr.....	Pounds per hour
lb./MMBtu.....	Pounds per million British thermal units
NAICS.....	North American Industry Classification System
MVAC.....	Motor vehicle air conditioner
N/A.....	Not Applicable
NSPS.....	New source performance standards
ppmv.....	Parts per million by volume
SIC.....	Standard Industrial Classification
SCC.....	Source Classification Codes
Ton/hr.....	Tons per hour
USEPA.....	United States Environmental Protection Agency

Pollutants

PM.....	Particulate matter (equivalent to TSP, total suspended particles)
PM ₁₀	Particulate matter ten microns and less in diameter
SO ₂	Sulfur dioxide
SO _x	Sulfur oxides
NO _x	Nitrogen oxides
VOC.....	Volatile organic compounds
CO.....	Carbon monoxide
HAP.....	Hazardous air pollutants

I. Facility Description and Equipment List

Facility Name: CDI, LLC

Permit Number: 06-TV-004-M001

Facility Description: Motor Homes Painting

Equipment List

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description	IDNR Construction Permit Number
BC1	BC1	Basecoat Paint Booth #1 and Oven	02-A-479-P2
BC2			02-A-480-P2
BC3	BC2	Basecoat Paint Booth #2 and Oven	05-A-694-P1
BC4			05-A-695-P1
BC5	BC3	Basecoat Paint Booth #3 and Oven	05-A-696-P1
BC6			05-A-697-P1
CC1	CC1	Clearcoat Paint Booth #1 and Oven	02-A-481-P2
CC2			02-A-482-P2
CC3	CC2	Clearcoat Paint Booth #2 and Oven	02-A-483-P2
CC4			02-A-484-P2
CC5	CC3	Clearcoat Paint Booth #3 and Oven	02-A-485-P2
CC6			02-A-486-P2
FFB1 ^(*)	FFB	Final Finish Paint Booth and Oven ^(*)	07-A-1262-P1
FFB2 ^(*)			07-A-1263-P1
MR1	MR	Paint Mix Room	02-A-720-P2
E1	SA	Sanding Area	05-A-698-S1
E2			05-A-699-S1
E3			05-A-700-S1
E4			05-A-701-S1
SR1	SR	Spray Room	05-A-702-P1
SR2			05-A-703-P1
SR3			05-A-704-P1
SR4			05-A-705-P2
FF1	FF	Final Finish	05-A-706-P1
FF2			05-A-707-P1
FF3			05-A-708-P1

Note: Equipment enclosed in double borders is grouped in a table in the Emission Point-Specific Conditions section of the permit.

^(*) Construction permits identify these emission points as FF4 and FF5 and the booth as Clearcoat Point Booth #4.

Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
HT1	Natural Gas Radiant Heaters (11 units, 0.15 MMBtu/hr each)
HT2	Natural Gas Radiant Heaters (5 units, 0.125 MMBtu/hr each)

II. Plant-Wide Conditions

Facility Name: CDI, LLC

Permit Number: 06-TV-004-M001

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Five (5) years.

Commencing on: August 18, 2006

Ending on: August 17, 2011

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Plant-wide Emission Limits

The following limitations and supporting regulations are applicable plantwide:

Pollutant: VOC

BACT Emission Limit: 185 tpy as a rolling 365-day total and determined on a daily basis.

Authority for Requirement: Iowa DNR Construction Permits 02-A-479-P2 through 02-A-486-P2, 02-A-720-P2, 05-A-694-P1 through 05-A-697-P1, 05-A-702-P1 through 05-A-708-P1, 07-A-1262-P1, and 07-A-1263-P1

Pollutant: Organic HAPs

Emission Limit: 1.34 kg (1.34 lb) organic HAPs per kg (lb) coating solids as a rolling 12-month emission rate and determined on a monthly basis.

Authority for Requirement: Iowa DNR Construction Permits 02-A-479-P2 through 02-A-486-P2, 02-A-720-P2, 05-A-694-P1 through 05-A-697-P1, 05-A-702-P1 through 05-A-708-P1, 07-A-1262-P1, and 07-A-1263-P1

567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and

Iowa DNR Administrative Consent Order No. 2004-AQ-68,

Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO₂): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, CDI, LLC is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term CDI, LLC shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

40 CFR 63 Subpart PPPP Requirements

This facility's coating operation is subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products MACT – 40 CFR 63 subpart PPPP. The subpart was promulgated on April 19, 2004 and amended on April 26, 2004.

Subpart PPPP is included as Appendix 2 (page 54) in this permit.

Affected Source

Pursuant to 40 CFR 63.4482(b), affected units are the equipment in surface preparation (including dried coating removal), coating application and curing, equipment cleaning, paint and solvent storage, mixing and conveying vessels, and storage and conveying waste material generated from the coating operations.

Regardless of 40 CFR 63.4482(c), (d) and (e) which defines new sources as those painting operations that were built after December 4, 2002, CDI's painting operations are considered new sources as required by Iowa DNR Administrative Consent Order No. 2004-AQ-68 and all the construction permits issued to the facility.

Compliance Dates:

Pursuant to 40 CFR 63.4483(a), new or reconstructed affected units have a following compliance date:

- (1) If the initial startup of your new or reconstructed affected source is before April 19, 2004, the compliance date is April 19, 2004.
- (2) If the initial startup of your new or reconstructed affected source occurs after April 19, 2004, the compliance date is the date of initial startup of your affected source.

Initial Notification (40 CFR 63.4510(b))

You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.

Emission Limit

The surface coating activities are new affected sources and belong to the subcategory of "Assembled On-road Vehicle". Therefore, pursuant to 40 CFR 63.4490(a)(4), CDI shall limit organic HAP emissions to no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period. Pursuant to 40 CFR 63.4500(a)(1), the facility must be in compliance with this emission limit at all times.

Options for Meeting Emission Limits

Pursuant to 40 CFR 63.4491, to determine whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4490, the facility must use at least one of the following three compliance options.

1. Compliant material option
2. Emission rate without add-on controls option
3. Emission rate with add-on controls option

As required by IDNR Consent Administrative Consent Order No. 2004-AQ-68, CDI will implement the 2nd compliance option - "Emission rate without add-on controls."

Operating Limits and Work Practice Standards

According to § 63.4493, for any coating operation(s) on which you use the emission rate without add-on controls option, you are not required to meet any operating limits or work practice standards.

Compliance Requirements

The initial compliance period begins on the applicable compliance date and ends on the last day of the 12th month following the compliance date. Continuous compliance is based on a 12-month rolling period (rolled monthly) which begins after the initial compliance period. The demonstration of compliance depends on the option you choose.

Pursuant to 40 CFR 63.3950, for the emission rate without add-on controls option, you must complete the initial compliance demonstration according to §63.4551 and the continuous compliance demonstration according to §63.4552.

Notification of Compliance Status

According to 40 CFR 63.4510(c), you must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in § 63.4550. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c)(1) through (11) and in 40 CFR 63.9(h).

Reports and Record Keeping

Refer to 40 CFR 63.4520, 4530, and 4531 for reports and record keeping requirements.

Authority for Requirement: 567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP

Requirements of Administrative Consent Order No. 2004-AQ-68

On December 27, 2004, Iowa DNR issued Administrative Consent Order No. 2004-AQ-68 to CDI, LLC which is included as Appendix 2 (page 89) to this permit. The Order orders and CDI agrees to the following:

1. CDI shall immediately comply with the requirements of Clean Air Act Section 112(g) at its Forest City facility by implementing one of the control strategies specified in the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, subpart PPPP;
2. In the future, CDI shall comply with the conditions of its construction permits; and
3. Within 30 days of the date of the Director signs this order, CDI shall pay a penalty of \$8,000.00.

For further requirements related to compliance with the 40 CFR 63 subpart PPPP and controlling HAP emissions, please see Exhibit "A" to the Order.

Authority for Requirement: Iowa DNR Administrative Consent Order No. 2004-AQ-68

III. Emission Point-Specific Conditions

Facility Name: CDI, LLC

Permit Number: 06-TV-004-M001

Emission Point ID Number: BC1 through BC6

Associated Equipment

Table Basecoat-1

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
BC1	BC1	Basecoat Paint Booth #1 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	BC1: Dry Filters
BC2					BC2: Dry Filters
BC3	BC2	Basecoat Paint Booth #2 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	BC3: Dry Filters
BC4					BC4: Dry Filters
BC5	BC3	Basecoat Paint Booth #3 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	BC5: Dry Filters
BC6					BC6: Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Table Basecoat-2

EP	EU	Opacity	PM (gr/scf)	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (ppmv)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
BC1	BC1	40% ⁽¹⁾	0.01	0.37	0.37	500	185 ⁽²⁾	1.34 ⁽³⁾	02-A-479-P2
BC2		40% ⁽¹⁾	0.01	0.37	0.37	500			02-A-480-P2
BC3	BC2	40% ⁽¹⁾	0.01	0.37	0.37	500			05-A-694-P1
BC4		40% ⁽¹⁾	0.01	0.37	0.37	500			05-A-695-P1
BC5	BC3	40% ⁽¹⁾	0.01	0.37	0.37	500			05-A-696-P1
BC6		40% ⁽¹⁾	0.01	0.37	0.37	500			05-A-697-P1

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Total emissions allowed for the facility (plant number 95-01-012) per rolling 365-day period. Limit is established as BACT.

⁽³⁾ Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Table Basecoat-3 – Authority for Emission Limits in Table Basecoat-2

Pollutant	Emission Limits	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Basecoat-2
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Basecoat-2
PM/PM ₁₀	0.37 lb/hr	Iowa DNR Construction Permits Referenced in Table Basecoat-2
SO ₂	500 ppmv	567 IAC 23.3(3)"e"
VOC	185 tpy	Iowa DNR Construction Permits Referenced in Table Basecoat-2
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Basecoat-2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability:

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Operating Limits:

- A. Each of the booths shall not operate more than 4,300 hours per rolling 365-day period.
- B. This facility (plant number 95-01-012) shall not paint more than 6,000 vehicles per rolling 365-day period.
- C. The maximum VOC content of coatings (as applied) used in each of the booths shall not exceed 3.22 lb/gal.
- D. The owner or operator shall notify the Department within one (1) working day if any of the VOC limits in this permit are exceeded at any time.
- E. Only HVLP guns shall be used in this emission unit. The guns shall only be cleaned in a Safety-Kleen system designed to reduce solvent loss.
- F. The owner or operator shall inspect and maintain the control equipment according to manufacturer’s recommendations.
- G. The owner or operator shall install and operate an automatic tamperproof pressure drop sensor set with an audible alarm to go off when the pressure drop exceeds the filter manufacturer’s recommendation.
- H. The maximum solids content of coatings (as applied) used in each booth shall not exceed the solids content (as applied) used in previous compliant stack tests.

- I. Each of the booths is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Reporting & Record Keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources.

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in each booth.
- B. A log of the VOC content of each coating (as applied) used in each booth.
- C. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
- The amount of each material used (in gallons),
 - The solids content (in weight percent),
 - The VOC content, and
 - Each hazardous air pollutant (HAP).
- Calculate and record the 365-day rolling total for VOC for each day of operation.
- D. Record daily the number of vehicles painted at the facility (plant number 95-01-012). Calculate and record the 365-day rolling total for the number of vehicles painted for each day of operation
- E. Record daily the number of hours each booth is used each day. Calculate and record the 365-day rolling total for the hours of operation for each day of operation.
- F. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage totals. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- G. Documentation showing the solids content (as applied) of the materials used in previous compliant stack tests.
- H. A log of all inspections and maintenance of the control equipment. The cases due to the pressure drop alarm goes off shall be noted.
- I. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Authority for Requirement: Iowa DNR construction permits 02-A-479-P2, 02-A-480-P2, and 05-A-694-P1 through 05-A-697-P1.

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table Basecoat-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
BC1	BC1	02-A-479-P2	30	Vertical unobstructed	34	70	15,000
BC2		02-A-480-P2	30	Vertical unobstructed	34	70	15,000
BC3	BC2	05-A-694-P1	30	Vertical unobstructed	34	70	15,000
BC4		05-A-695-P1	30	Vertical unobstructed	34	70	15,000
BC5	BC3	05-A-696-P1	30	Vertical unobstructed	34	70	15,000
BC6		05-A-697-P1	30	Vertical unobstructed	34	70	15,000

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Basecoat-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

EP	Test Required	Test Method	Test Run Time	Test Frequency	Initial Test Deadline	Authority for Requirement
BC1	Opacity	(1)	1 hour	One Initial	(4)	02-A-479-P2
	PM	(2)	6 hours	(3)	(4)	02-A-479-P2
BC2	Opacity	(1)	1 hour	One Initial	(4)	02-A-480-P2
	PM	(2)	6 hours	(3)	(4)	02-A-480-P2
BC3	Opacity	(1)	1 hour	One Initial	(4)	05-A-694-P1
	PM	(2)	6 hours	(3)	(4)	05-A-694-P1
BC4	Opacity	(1)	1 hour	One Initial	(4)	05-A-695-P1
	PM	(2)	6 hours	(3)	(4)	05-A-695-P1
BC5	Opacity	(1)	1 hour	One Initial	(4)	05-A-696-P1
	PM	(2)	6 hours	(3)	(4)	05-A-696-P1
BC6	Opacity	(1)	1 hour	One Initial	(4)	05-A-697-P1
	PM	(2)	6 hours	(3)	(4)	05-A-697-P1
BC1 To BC6	Total HAP	Demonstrate compliance through one of the methods listed in 40 CFR §63.4491 for purposes of NESHAP Subpart PPPP on a 12-month rolling basis.				All permits listed above.
<p>(1) 40 CFR 60, Appendix A, Method 9</p> <p>(2) Iowa Compliance Sampling Manual Method 5</p> <p>(3) The owner or operator is required to conduct a stack test on at least one (1) representative basecoat paint booth a minimum of one (1) time per year after the initial compliance test. If after four (4) stack tests have been conducted and no emission limits have been exceeded, the owner or operator may reduce the testing frequency to one (1) test every two (2) years.</p> <p>(4) As required by the corresponding construction permits, the owner shall verify initial compliance with the emission limitations within 60 days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.</p>						

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No
Relevant requirements of O & M plan for this equipment: PM/PM₁₀

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Agency Operation & Maintenance Plan for Paint Booths

Weekly

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

- Maintenance and inspection records will be kept for five years and available upon request.

Quality Control

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: CC1 through CC6, FFB1 and FFB2

Associated Equipment

Table Clearcoat-1

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
CC1	CC1	Clearcoat Paint Booth #1 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	CC1: Dry Filters
CC2					CC2: Dry Filters
CC3	CC2	Clearcoat Paint Booth #2 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	CC3: Dry Filters
CC4					CC4: Dry Filters
CC5	CC3	Clearcoat Paint Booth #3 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	CC5: Dry Filters
CC6					CC6: Dry Filters
FFB1 ^(*)	FFB	Final Finish Paint Booth and Oven ^(*)	Clearcoat, Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	FFB1: Dry Filters
FFB2 ^(*)					FFB2: Dry Filters

^(*) Construction permits identify these emission points as FF4 and FF5 and the booth as Clearcoat Point Booth #4.

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Table Clearcoat-2

EP	EU	Opacity	PM (gr/scf)	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (ppmv)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
CC1	CC1	40% ⁽¹⁾	0.01	0.26	0.26	500	185 ⁽²⁾	1.34 ⁽³⁾	02-A-481-P2
CC2		40% ⁽¹⁾	0.01	0.26	0.26	500			02-A-482-P2
CC3	CC2	40% ⁽¹⁾	0.01	0.26	0.26	500			02-A-483-P2
CC4		40% ⁽¹⁾	0.01	0.26	0.26	500			02-A-484-P2
CC5	CC3	40% ⁽¹⁾	0.01	0.26	0.26	500			02-A-485-P2
CC6		40% ⁽¹⁾	0.01	0.26	0.26	500			02-A-486-P2
FFB1	FFB	40% ⁽¹⁾	0.01	0.26	0.26	N/A			07-A-1262-P1
FFB2		40% ⁽¹⁾	0.01	0.26	0.26	N/A			07-A-1263-P1

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Total emissions allowed for the facility (plant number 95-01-012) per rolling 365-day period. Limit is established as BACT.

⁽³⁾ Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Table Clearcoat-3 – Authority for Emission Limits in Table Clearcoat-2

Pollutant	Emission Limits	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Clearcoat-2
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Clearcoat-2
PM/PM ₁₀	0.26 lb/hr	Iowa DNR Construction Permits Referenced in Table Clearcoat-2
SO ₂	500 ppmv	567 IAC 23.3(3)"e"
VOC	185 tpy	Iowa DNR Construction Permits Referenced in Table Clearcoat-2
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Clearcoat-2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability:

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Operating Limits:

- A. Each of the booths shall not operate more than 4,300 hours per rolling 365-day period.
- B. This facility (plant number 95-01-012) shall not paint more than 6,000 vehicles per rolling 365-day period.
- C. The owner or operator shall notify the Department within one (1) working day if any of the VOC limits in this permit are exceeded at any time.
- D. Only HVLP guns shall be used in this emission unit. The guns shall only be cleaned in a Safety-Kleen system designed to reduce solvent loss.
- E. The owner or operator shall inspect and maintain the control equipment according to manufacturer’s recommendations.
- F. The owner or operator shall install and operate an automatic tamperproof pressure drop sensor set with an audible alarm to go off when the pressure drop exceeds the filter manufacturer’s recommendation.
- G. The maximum solids content of coatings (as applied) used in each booth shall not exceed the solids content (as applied) used in previous compliant stack tests.
- H. Each of the booths is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Reporting & Record Keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources.

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in each booth.
- B. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
 - The amount of each material used (in gallons),
 - The solids content (in weight percent),
 - The VOC content, and
 - Each hazardous air pollutant (HAP).Calculate and record the 365-day rolling total for VOC for each day of operation.
- C. Record daily the number of vehicles painted at the facility (plant number 95-01-012). Calculate and record the 365-day rolling total for the number of vehicles painted for each day of operation
- D. Record daily the number of hours each booth is used each day. Calculate and record the 365-day rolling total for the hours of operation for each day of operation.
- E. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage totals. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- F. Documentation showing the solids content (as applied) of the materials used in previous compliant stack tests.
- G. A log of all inspections and maintenance of the control equipment. The cases due to the pressure drop alarm goes off shall be noted.
- H. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Authority for Requirement: Iowa DNR construction permits 02-A-481-P2 through 02-A-486-P2, 07-A-1262-P1 and 07-A-1263-P1.

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table Clearcoat-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
CC1	CC1	02-A-481-P2	30	Vertical unobstructed	34	70	15,000
CC2		02-A-482-P2	30	Vertical unobstructed	34	70	15,000
CC3	CC2	02-A-483-P2	30	Vertical unobstructed	34	70	15,000
CC4		02-A-484-P2	30	Vertical unobstructed	34	70	15,000
CC5	CC3	02-A-485-P2	30	Vertical unobstructed	34	70	15,000
CC6		02-A-486-P2	30	Vertical unobstructed	34	70	15,000
FFB1	FFB	07-A-1262-P1	30	Vertical unobstructed	34	70	7,500
FFB2		07-A-1263-P1	30	Vertical unobstructed	34	70	7,500

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Clearcoat-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

EP	Test Required	Test Method	Test Run Time	Test Frequency	Initial Test Deadline	Authority for Requirement
CC1	Opacity	(1)	1 hour	One Initial	(4)	02-A-481-P2
	PM	(2)	8.5 hours	(3)	(4)	02-A-481-P2
CC2	Opacity	(1)	1 hour	One Initial	(4)	02-A-482-P2
	PM	(2)	8.5 hours	(3)	(4)	02-A-482-P2
CC3	Opacity	(1)	1 hour	One Initial	(4)	02-A-483-P2
	PM	(2)	8.5 hours	(3)	(4)	02-A-483-P2
CC4	Opacity	(1)	1 hour	One Initial	(4)	02-A-484-P2
	PM	(2)	8.5 hours	(3)	(4)	02-A-484-P2
CC5	Opacity	(1)	1 hour	One Initial	(4)	02-A-485-P2
	PM	(2)	8.5 hours	(3)	(4)	02-A-485-P2
CC6	Opacity	(1)	1 hour	One Initial	(4)	02-A-486-P2
	PM	(2)	8.5 hours	(3)	(4)	02-A-486-P2
FFB1	Opacity	(1)	1 hour	One Initial	(4)	07-A-1262-P1
	PM	(2)	4.23 hours	(3)	(4)	07-A-1262-P1
FFB2	Opacity	(1)	1 hour	One Initial	(4)	07-A-1263-P1
	PM	(2)	2.12 hours	(3)	(4)	07-A-1263-P1
All EPs	Total HAP	Demonstrate compliance through one of the methods listed in 40 CFR §63.4491 for purposes of NESHAP Subpart PPPP on a 12-month rolling basis.			All permits listed above.	

(1) 40 CFR 60, Appendix A, Method 9

(2) Iowa Compliance Sampling Manual Method 5

(3) The owner or operator is required to conduct a stack test on at least one (1) representative clearcoat paint booth a minimum of one (1) time per year after the initial compliance test. If after four (4) stack tests have been conducted and no emission limits have been exceeded, the owner or operator may reduce the testing frequency to one (1) test every two (2) years.

(4) As required by the corresponding construction permits, the owner shall verify initial compliance with the emission limitations within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No
Relevant requirements of O & M plan for this equipment: PM/PM10

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Agency Operation & Maintenance Plan for Paint Booths

Weekly

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

- Maintenance and inspection records will be kept for five years and available upon request.

Quality Control

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: MR1

Associated Equipment

Associated Emission Unit ID Numbers: MR

Emission Units vented through this Emission Point: MR

Emission Unit Description: Paint Mix Room

Raw Material/Fuel: Paint

Rated Capacity: N/A

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: VOC

Emission Limit(s): 185 tpy⁽¹⁾

⁽¹⁾ Total emissions allowed for the facility (plant number 95-01-012) per rolling 365-day period. Limit is established as BACT.

Authority for Requirement: Iowa DNR Construction Permit 02-A-720-P2

Pollutant: Total HAP

Emission Limit(s): 1.34 kg/kg⁽²⁾

⁽²⁾ Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Authority for Requirement: 567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and
Iowa DNR Construction Permit 02-A-720-P2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability:

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

The owner or operator shall demonstrate compliance with the Total HAP limit of 1.34 kg/kg through one of the methods listed in 40 CFR §63.4491 for purposes of NESHAP Subpart PPPP on a 12-month rolling basis.

Operating Limits:

- A. The owner or operator shall notify the Department within one (1) working day if any of the VOC limits in this permit are exceeded at any time.
- B. For recordkeeping and tracking purposes, VOC emissions from this source shall be accounted for in the emission unit in which the material is applied.
- C. Covers shall be maintained on all coating containers when practical
- D. This emission unit is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Reporting & Record Keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources.

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in this emission unit.
- B. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
 - The amount of each material used (in gallons),
 - The solids content (in weight percent),
 - The VOC content, and
 - Each hazardous air pollutant (HAP).Calculate and record the 365-day rolling total for VOC for each day of operation.
- C. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage totals. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- D. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Authority for Requirement: Iowa DNR Construction Permit 02-A-720-P2

Emission Point Characteristics

This emission point shall conform to the conditions listed below.

Stack Height (ft, from the ground): 11 ft

Stack Opening (inches): 15 in × 15 in

Exhaust Flowrate (scfm): 850

Exhaust Temperature (°F): 70

Discharge Style: Horizontal

Authority for Requirement: Iowa DNR Construction Permit 02-A-720-P2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate

may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: E1, E2, E3, and E4

Associated Equipment

Table Sanding-1

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity
E1	SA	Sanding Area	Masking Tape, Masking Paper, Sand Paper	17 units/day ^(*)
E2				
E3				
E4				

^(*) Based on construction permits for this unit.

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Table Sanding-2

EP	EU	Opacity	PM (gr/dscf)	PM (lb/hr)	PM ₁₀ (lb/hr)	Iowa DNR Construction Permit #
E1	SA	40% ⁽¹⁾	0.1	0.18	0.18	05-A-698-S1
E2		40% ⁽¹⁾	0.1	0.18	0.18	05-A-699-S1
E3		40% ⁽¹⁾	0.1	0.18	0.18	05-A-700-S1
E4		40% ⁽¹⁾	0.1	0.18	0.18	05-A-701-S1

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Table Sanding-3

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Sanding-2.
PM	0.1 gr/dscf	567 IAC 23.3(2)"a" and Iowa DNR Construction Permits Referenced in Table Sanding-2.
PM/PM ₁₀	0.18 lb/hr	Iowa DNR Construction Permits Referenced in Table Sanding-2.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

No operating limits at this time.

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table Sanding-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
E1	SA	05-A-698-S1	15	Horizontal	38"	70	5,500
E2		05-A-699-S1	15	Horizontal	38"	70	5,500
E3		05-A-700-S1	15	Horizontal	38"	70	5,500
E4		05-A-701-S1	15	Horizontal	38"	70	5,500

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Sanding-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

EP	Test Required	Test Method	Test Run Time	Test Frequency	Initial Test Deadline	Authority for Requirement
E1	Opacity	(1)	1 hour	One Initial	(4)	05-A-698-S1
	PM	(2)	4.5 hours	(3)	(4)	05-A-698-S1
E2	Opacity	(1)	1 hour	One Initial	(4)	05-A-699-S1
	PM	(2)	4.5 hours	(3)	(4)	05-A-699-S1
E3	Opacity	(1)	1 hour	One Initial	(4)	05-A-700-S1
	PM	(2)	4.5 hours	(3)	(4)	05-A-700-S1
E4	Opacity	(1)	1 hour	One Initial	(4)	05-A-701-S1
	PM	(2)	4.5 hours	(3)	(4)	05-A-701-S1

(1) 40 CFR 60, Appendix A, Method 9
 (2) Iowa Compliance Sampling Manual Method 5
 (3) The owner or operator is required to conduct a stack test on at least one (1) representative sanding area exhaust point a minimum of one (1) time per year after the initial compliance test. If after four (4) stack tests have been conducted and no emission limits have been exceeded, the owner or operator may reduce the testing frequency to one (1) test every two (2) years.
 (4) As required by the corresponding construction permits, the owner shall verify initial compliance with the emission limitations within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Emission Point ID Number: SR1, SR2, SR3, and SR4

Associated Equipment

Table Spray-1

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
SR1	SR	Spray Room	Paint	50.4 gal/hr (18 guns @ 2.8 gal/hr each)	SR1: Dry Filters
SR2					SR2: Dry Filters
SR3					SR3: Dry Filters
SR4					SR4: Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Table Spray-2

EP	EU	Opacity	PM (gr/dscf)	PM (lb/hr)	PM ₁₀ (lb/hr)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
SR1	SR	40% ⁽¹⁾	0.01	0.39	0.39	185 ⁽²⁾	1.34 ⁽³⁾	05-A-702-P1
SR2		40% ⁽¹⁾	0.01	0.39	0.39			05-A-703-P1
SR3		40% ⁽¹⁾	0.01	0.39	0.39			05-A-704-P1
SR4		40% ⁽¹⁾	0.01	0.39	0.39			05-A-705-P2

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Total emissions allowed for the facility (plant number 95-01-012) per rolling 365-day period. Limit is established as BACT.

⁽³⁾ Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Table Spray-3

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Spray-2.
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Spray-2.
PM/PM ₁₀	0.39 lb/hr	Iowa DNR Construction Permits Referenced in Table Spray-2.
VOC	185 tpy	Iowa DNR construction permits Referenced in Table Spray-2.
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Spray-2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability:

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Operating Limits:

- A. This emission unit shall not operate more than 4,300 hours per rolling 365-day period.
- B. This facility (plant number 95-01-012) shall not paint more than 6,000 vehicles per rolling 365-day period.
- C. The maximum VOC content of coatings (as applied) used in this unit shall not exceed 3.22 lb/gal.
- D. The owner or operator shall notify the Department within one (1) working day if any of the VOC limits in this permit are exceeded at any time.
- E. Only HVLP guns shall be used in this emission unit. The guns shall only be cleaned in a Safety-Kleen system designed to reduce solvent loss.
- F. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- G. The owner or operator shall install and operate an automatic tamperproof pressure drop sensor set with an audible alarm to go off when the pressure drop exceeds the filter manufacturer's recommendation.
- H. The maximum solids content of coatings (as applied) used in this emission unit shall not exceed the solids content (as applied) used in previous compliant stack tests.
- I. This emission unit is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581)..

Reporting & Record Keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources.

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in this emission unit.
- B. A log of the VOC content of each coating (as applied) used in this emission unit.
- C. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
 - The amount of each material used (in gallons),
 - The solids content (in weight percent),

- The VOC content, and
 - Each hazardous air pollutant (HAP).
- Calculate and record the 365-day rolling total for VOC for each day of operation.
- D. Record daily the number of vehicles painted at the facility (plant number 95-01-012). Calculate and record the 365-day rolling total for the number of vehicles painted for each day of operation.
- E. Record daily the number of hours this emission unit is used each day. Calculate and record the 365-day rolling total for the hours of operation for each day of operation.
- F. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage totals. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- G. Documentation showing the solids content (as applied) of the materials used in previous compliant stack tests.
- H. A log of all inspections and maintenance of the control equipment. The cases due to the pressure drop alarm goes off shall be noted.
- I. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Authority for Requirement: Iowa DNR construction permits 05-A-702-P1 and 05-A-705-P2.

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table Spray-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
SR1	SR	05-A-702-P1	30	Vertical unobstructed	34"	70	22,500
SR2		05-A-703-P1	30	Vertical unobstructed	34"	70	22,500
SR3		05-A-704-P1	30	Vertical unobstructed	34"	70	22,500
SR4		05-A-705-P2	30	Vertical unobstructed	34"	70	22,500

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Spray-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

EP	Test Required	Test Method	Test Run Time	Test Frequency	Initial Test Deadline	Authority for Requirement
SR1	Opacity	(1)	1 hour	One Initial	(4)	05-A-702-P1
	PM	(2)	8.5 hours	(3)	(4)	05-A-702-P1
SR2	Opacity	(1)	1 hour	One Initial	(4)	05-A-703-P1
	PM	(2)	8.5 hours	(3)	(4)	05-A-703-P1
SR3	Opacity	(1)	1 hour	One Initial	(4)	05-A-704-P1
	PM	(2)	8.5 hours	(3)	(4)	05-A-704-P1
SR4	Opacity	(1)	1 hour	One Initial	(4)	05-A-705-P2
	PM	(2)	8.5 hours	(3)	(4)	05-A-705-P2
All EPs	Total HAP	Demonstrate compliance through one of the methods listed in 40 CFR §63.4491 for purposes of NESHAP Subpart PPPP on a 12-month rolling basis.				All permits listed above.
<p>(1) 40 CFR 60, Appendix A, Method 9</p> <p>(2) Iowa Compliance Sampling Manual Method 5</p> <p>(3) The owner or operator is required to conduct a stack test on at least one (1) representative topcoat paint booth a minimum of one (1) time per year after the initial compliance test. If after four (4) stack tests have been conducted and no emission limits have been exceeded, the owner or operator may reduce the testing frequency to one (1) test every two (2) years.</p> <p>(4) As required by the corresponding construction permits, the owner shall verify initial compliance with the emission limitations within 60 days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.</p>						

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No
Relevant requirements of O & M plan for this equipment: PM/PM₁₀

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Agency Operation & Maintenance Plan for Paint Booths

Weekly

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

- Maintenance and inspection records will be kept for five years and available upon request.

Quality Control

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: FF1, FF2, and FF3

Associated Equipment

Table Finish-1

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
FF1	FF	Final Finish	Paint	33.6 gal/hr (12 guns @2.8 gal/hr each)	FF1:Dry Filters
FF2					FF2:Dry Filters
FF3					FF3:Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table Finish-2

EP	EU	Opacity	PM (gr/dscf)	PM (lb/hr)	PM ₁₀ (lb/hr)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
FF1	FF	40% ⁽¹⁾	0.01	0.21	0.21	185 ⁽²⁾	1.34 ⁽³⁾	05-A-706-P1
FF2		40% ⁽¹⁾	0.01	0.21	0.21			05-A-707-P1
FF3		40% ⁽¹⁾	0.01	0.21	0.21			05-A-708-P1

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Plantwide BACT limit.

⁽³⁾ Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Table Finish-3

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Finish-2.
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Finish-2.
PM/PM ₁₀	0.21 lb/hr	Iowa DNR Construction Permits Referenced in Table Finish-2.
VOC	185 tpy	Iowa DNR construction permits Referenced in Table Finish-2.
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Finish-2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability:

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Operating Limits:

- A. This unit shall not operate more than 4,300 hours per rolling 365-day period.
- B. This facility (plant number 95-01-012) shall not paint more than 6,000 vehicles per rolling 365-day period.
- C. The owner or operator shall notify the Department within one (1) working day if any of the VOC limits in this permit are exceeded at any time.
- D. Only HVLP guns shall be used in this emission unit. The guns shall only be cleaned in a Safety-Kleen system designed to reduce solvent loss.
- E. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- F. The owner or operator shall replace the filters at least once every thirty (30) days.
- G. The maximum solids content of coatings (as applied) used in this emission unit shall not exceed the solids content (as applied) used in previous compliant stack tests.
- H. This emission unit is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Reporting & Record Keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources.

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in this emission unit.
- B. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
 - The amount of each material used (in gallons),
 - The solids content (in weight percent),
 - The VOC content, and
 - Each hazardous air pollutant (HAP).Calculate and record the 365-day rolling total for VOC for each day of operation.
- C. Record daily the number of vehicles painted at the facility (plant number 95-01-012). Calculate and record the 365-day rolling total for the number of vehicles painted for each day of operation.
- D. Record daily the number of hours this emission unit is used each day. Calculate and record the 365-day rolling total for the hours of operation for each day of operation.
- E. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from

the VOC usage totals. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.

- F. Documentation showing the solids content (as applied) of the materials used in previous compliant stack tests.
- G. A log of all inspections, maintenance of the control equipment, and dates of filter replacement.
- H. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

Authority for Requirement: Iowa DNR construction permits 05-A-706-P1 and 05-A-708-P1.

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table Finish-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
FF1	FF	05-A-706-P1	15	Horizontal	38"	70	5,500
FF2		05-A-707-P1	15	Horizontal	38"	70	5,500
FF4		05-A-708-P1	15	Horizontal	38"	70	5,500

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Finish-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

EP	Test Required	Test Method	Test Run Time	Test Frequency	Initial Test Deadline	Authority for Requirement
FF1	Opacity	(1)	1 hour	One Initial	(4)	05-A-706-P1
	PM ⁽⁵⁾	(2)	4 hours	(3)	(4)	05-A-706-P1
FF2	Opacity	(1)	1 hour	One Initial	(4)	05-A-707-P1
	PM ⁽⁵⁾	(2)	4 hours	(3)	(4)	05-A-707-P1
FF3	Opacity	(1)	1 hour	One Initial	(4)	05-A-708-P1
	PM ⁽⁵⁾	(2)	4 hours	(3)	(4)	05-A-708-P1
All EPs	Total HAP	Demonstrate compliance through one of the methods listed in 40 CFR §63.4491 for purposes of NESHAP Subpart PPPP on a 12-month rolling basis.			All permits listed above.	

(1) 40 CFR 60, Appendix A, Method 9
 (2) Iowa Compliance Sampling Manual Method 5
 (3) The owner or operator is required to conduct a stack test on at least one (1) representative final finish a minimum of one (1) time per year after the initial compliance test. If after four (4) stack tests have been conducted and no emission limits have been exceeded, the owner or operator may reduce the testing frequency to one (1) test every two (2) years.
 (4) As required by the corresponding construction permits, the owner shall verify initial compliance with the emission limitations within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.
 (5) The test shall be done while painting. The owner or operator is allowed to demonstrate that the emission unit can meet the emission limit without the use of control equipment while painting by removing the filters for the duration of the stack test.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No
 Relevant requirements of O & M plan for this equipment: PM/PM₁₀

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Agency Operation & Maintenance Plan for Paint Booths

Weekly

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

- Maintenance and inspection records will be kept for five years and available upon request.

Quality Control

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

Authority for Requirement: 567 IAC 22.108(3)

General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. 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 the permit. *567 IAC 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. 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. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the

identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.

8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any 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. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
- b. The date the analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.
- g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)

2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance

records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

- a. Any monitoring or testing methods provided in these rules; or
- b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process

equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.

- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which 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 non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can 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 facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
 - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
 - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
 - d. The changes are not subject to any requirement under Title IV of the Act.
 - e. The changes comply with all applicable requirements.
 - f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
 - i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change.
2. 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), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*
3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*
4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*
5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that is required to do any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- iii. Require more frequent monitoring or reporting by the permittee; or
- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:

- i. Do not violate any applicable requirements
- ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
- iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
- iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
- v. Are not modifications under any provision of Title I of the Act; and
- vi. Are not required to be processed as significant modification.

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
- ii. The permittee's suggested draft permit
- iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and

iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).

c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(8)

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1)

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations, training fires and controlled burning of a demolished building. 567 IAC 23.1(3)"a", and 567 IAC 23.2

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 *except* 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the

owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
 - a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;
 - b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
 - c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a"*, *567 IAC 22.108(17)"b"*
3. A permit shall be reopened and revised under any of the following circumstances:
 - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;
 - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G25. Permit Shield

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
 - a. Such applicable requirements are included and are specifically identified in the permit;
or
 - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
3. A permit shield shall not alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
 - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in

writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons.

567 IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2

P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5

401 SW 7th Street, Suite I
Des Moines, IA 50309
(515) 725-0268

Field Office 6

1023 West Madison Street
Washington, IA 52353-1623
(319) 653-2135

Polk County Public Works Dept.

Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

V. APPENDIX 1

40 CFR 63 Subpart P National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

[Published on April 19, 2004 and as amended on [April 24, 2007](#)]

[The following selected sections and paragraphs of subpart P are listed here for convenience based on the determination, as in IDNR Administrative Consent Order No. 2004-AQ-68, that CDI, LLC coating operations are new affected sources, in the subcategory of "Assembled On-road Vehicles," and that CDI, LLC implements the compliance option of "emission rate without add-on controls." Please refer to the whole subpart for complete and detailed requirements.]

Subpart PPPP—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

What This Subpart Covers

§ 63.4480 What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for plastic parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

§ 63.4481 Am I subject to this subpart?

(a) Plastic parts and products include, but are not limited to, plastic components of the following types of products as well as the products themselves: Motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products. Except as provided in paragraph (c) of this section, the source category to which this subpart applies is the surface coating of any plastic parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (5) of this section.

(1) Surface coating is the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of this subpart.

(2) The general use coating subcategory includes all surface coating operations that are not automotive lamp coating operations, thermoplastic olefin (TPO) coating operations, or assembled on-road vehicle coating operations.

(3) The automotive lamp coating subcategory includes the surface coating of plastic components of the body of an exterior automotive lamp including, but not limited to, headlamps, tail lamps, turn signals, and marker (clearance) lamps; typical coatings used are reflective argent coatings and clear topcoats. This subcategory does not include the coating of interior automotive lamps, such as dome lamps and instrument panel lamps.

(4) The TPO coating subcategory includes the surface coating of TPO substrates; typical coatings used are adhesion promoters, color coatings, clear coatings and topcoats. The coating of TPO substrates on fully assembled on-road vehicles is not included in the TPO coating subcategory.

(5) The assembled on-road vehicle coating subcategory includes surface coating of fully assembled motor vehicles and trailers intended for on-road use, including, but not limited to: automobiles, light-duty trucks, heavy duty trucks, and busses that have been repaired after a collision or otherwise repainted; fleet delivery trucks; and motor homes and other recreational vehicles (including camping trailers and fifth wheels). This subcategory also includes the incidental coating of parts, such as radiator grilles, that are removed from the fully assembled on-road vehicle to facilitate concurrent coating of all parts associated with the vehicle. The assembled on-road vehicle coating subcategory does not include the surface coating of plastic parts prior to their attachment to an on-road vehicle on an original equipment manufacturer's (OEM) assembly line. The assembled on-road vehicle coating subcategory also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles. Body fillers used to correct small surface defects and rubbing compounds used to remove surface scratches are not considered coatings subject to this subpart.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.4482, that uses 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non-HAP coating contained in §63.4581 in determining whether you use 378 liters (100 gallons) per year, or more, of coatings in the surface coating of plastic parts and products.

...

§ 63.4482 What parts of my plant does this subpart cover?

(a) This subpart applies to each new, reconstructed, and existing affected source within each of the four subcategories listed in §63.4481(a).

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of plastic parts and products within each subcategory.

(1) All coating operations as defined in §63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) An affected source is a new source if it meets the criteria in paragraph (c)(1) of this section and the criteria in either paragraph (c)(2) or (3) of this section.

(1) You commenced the construction of the source after December 4, 2002 by installing new coating equipment.

(2) The new coating equipment is used to coat plastic parts and products at a source where no plastic parts surface coating was previously performed.

(3) The new coating equipment is used to perform plastic parts and products coating in a subcategory that was not previously performed.

(d) An affected source is reconstructed if you meet the criteria as defined in §63.2.

(e) An affected source is existing if it is not new or reconstructed.

§ 63.4483 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.4540, 63.4550, and 63.4560.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is before April 19, 2004, the compliance date is April 19, 2004.

(2) If the initial startup of your new or reconstructed affected source occurs after April 19, 2004, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is the date 3 years after April 19, 2004.

...

(d) You must meet the notification requirements in §63.4510 according to the dates specified in that section and in subpart A of this part. Some of the notifications must be submitted before the compliance dates described in paragraphs (a) through (c) of this section.

Emission Limitations

§ 63.4490 What emission limits must I meet?

(a) For a new or reconstructed affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (a)(1) through (4) of this section, except as specified in paragraph (c) of this section, determined according to the requirements in §63.4541, §63.4551, or §63.4561.

...

(4) For each new assembled on-road vehicle coating affected source, limit organic HAP emissions to no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

...

§ 63.4491 What are my options for meeting the emission limits?

You must include all coatings (as defined in §63.4581), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.4490. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.4530(c), and you must report it in the next semiannual compliance report required in §63.4520.

...

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emission limit using this option.

...

§ 63.4492 What operating limits must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits.

...

§ 63.4493 What work practice standards must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any work practice standards.

...

General Compliance Requirements

§ 63.4500 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) and (2) of this section.

(1) Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in §63.4491(a) and (b), must be in compliance with the applicable emission limit in §63.4490 at all times.

...

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

...

§ 63.4501 What parts of the General Provisions apply to me?

Table 2 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Notifications, Reports, and Records

§ 63.4510 What notifications must I submit?

(a) *General.* You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) *Initial notification.* You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later. For an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004. If you are using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (subpart III of this part) as provided for under §63.4481(d) to constitute compliance with this subpart for any or all of your plastic parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those plastic parts coating operations. If you are complying with another NESHAP that constitutes the predominant activity at your facility under §63.4481(e)(2) to constitute compliance with this subpart for your plastic parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those plastic parts coating operations.

(c) *Notification of compliance status.* You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.4540, §63.4550, or §63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in §63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.4540, §63.4550, or §63.4560 that applies to your affected source.

(4) Identification of the compliance option or options specified in §63.4491 that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in §63.4490, include all the calculations you used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.4541(a), (b), or (c). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.

(ii) Mass fraction of coating solids for one coating.

(iii) Density for one coating, one thinner and/or other additive, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.4551.

(8) The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.

...

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total mass of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.4551.

...

§ 63.4520 What reports must I submit?

(a) *Semiannual compliance reports.* You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this

section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.4540, §63.4550, or §63.4560 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.4491 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.4491(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

...

(4) *No deviations.* If there were no deviations from the emission limitations in §§63.4490, 63.4492, and 63.4493 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

...

(6) *Deviations: Emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.4490, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.4490.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.4551; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

...

§ 63.4530 What records must I keep?

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. If you are using the predominant activity

alternative under §63.4490(c), you must keep records of the data and calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under §63.4490(c), you must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

...

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.4551 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of §63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.4551.

...

(d) A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the mass used.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(f) A record of the mass fraction of coating solids for each coating used during each compliance period.

(g) If you use an allowance in Equation 1 of §63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF)

according to §63.4551(e)(4), you must keep records of the information specified in paragraphs (g)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.4551, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.4551.

(3) The methodology used in accordance with §63.4551(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(h) You must keep records of the date, time, and duration of each deviation.

...

§ 63.4531 In what form and for how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years.

...

Compliance Requirements for the Compliant Material Option

...

§ 63.4541 How do I demonstrate initial compliance with the emission limitations?

...

(a) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning

material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63)*. You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (*e.g.*, 0.3791).

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (*e.g.*, 0.763).

(2) *Method 24 (appendix A to 40 CFR part 60)*. For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to this subpart, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to this subpart, as a substitute for the mass fraction of organic HAP.

(3) *Alternative method*. You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(4) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(5) *Solvent blends*. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you

use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) *Determine the mass fraction of coating solids for each coating.* You must determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (3) of this section.

(1) *Method 24 (appendix A to 40 CFR part 60).* Use Method 24 for determining the mass fraction of coating solids. For reactive adhesives in which some of the liquid fraction reacts to form solids, you may use the alternative method contained in appendix A to this subpart, rather than Method 24, to determine the mass fraction of coating solids.

(2) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(3) *Information from the supplier or manufacturer of the material.* You may obtain the mass fraction of coating solids for each coating from the supplier or manufacturer. If there is disagreement between such information and the test method results, then the test method results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

...

Compliance Requirements for the Emission Rate Without Add-On Controls Option

§ 63.4550 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.4551. The initial compliance period begins on the applicable compliance date specified in §63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and mass of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.4551 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.4490.

§ 63.4551 How do I demonstrate initial compliance with the emission limitations?

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.4490, but is not required to meet the operating limits or work practice standards in §§63.4492 and 63.4493, respectively. You must conduct a separate initial compliance demonstration for each general use, TPO, automotive lamp, and assembled on-road vehicle coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.4490(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.4490(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.4541(a).

(b) *Determine the mass fraction of coating solids.* Determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month according to the requirements in §63.4541(b).

(c) *Determine the density of each material.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to

determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

H_e = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to R_w if you do not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad (\text{Eq. 1A})$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

$Vol_{c,i}$ = Total volume of coating, i , used during the month, liters.

$D_{c,i}$ = Density of coating, i , kg coating per liter coating.

$W_{c,i}$ = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.4581, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to this subpart.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (Eq. 1B)$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$Vol_{t,j}$ = Total volume of thinner and/or other additive, j, used during the month, liters.

$D_{t,j}$ = Density of thinner and/or other additive, j, kg per liter.

$W_{t,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.4581, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to this subpart.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad (Eq. 1C)$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

$Vol_{s,k}$ = Total volume of cleaning material, k, used during the month, liters.

$D_{s,k}$ = Density of cleaning material, k, kg per liter.

$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSD in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.4530(g). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) *Calculate the total mass of coating solids used.* Determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$M_{st} = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(M_{s,i}) \quad (Eq. 2)$$

Where:

M_{st} = Total mass of coating solids used during the month, kg.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.

$D_{c,i}$ = Density of coating, i, kgs per liter coating, determined according to §63.4551(c).

$M_{s,i}$ = Mass fraction of coating solids for coating, i, kgs solids per kg coating, determined according to §63.4541(b).

m = Number of coatings used during the month.

(g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per kg (lb) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n M_{st}} \quad (Eq. 3)$$

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per kg coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

M_{st} = Total mass of coating solids used during month, y, kg, as calculated by Equation 2 of this section.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in §63.4490 or the predominant activity or facility-specific emission limit allowed in §63.4490(c). You must keep all records as required by §§63.4530 and 63.4531. As part of the notification of compliance status required by §63.4510, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.4490, determined according to the procedures in this section.

§ 63.4552 How do I demonstrate continuous compliance with the emission limitations?

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.4551(a) through (g), must be less than or equal to the applicable emission limit in §63.4490. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4550 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.4551(a) through (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under §63.4490(c), you must also perform the calculation using Equation 1 in §63.4490(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.4490, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.4510(c)(6) and 63.4520(a)(6).

(c) As part of each semiannual compliance report required by §63.4520, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If

there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4490, determined according to §63.4551(a) through (g).

(d) You must maintain records as specified in §§63.4530 and 63.4531.

...

Other Requirements and Information

§ 63.4580 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the requirements in §§63.4481 through 4483 and §§63.4490 through 4493.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.4581 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Add-on control means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Adhesive, adhesive coating means any chemical substance that is applied for the purpose of bonding two surfaces together. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Assembled on-road vehicle coating means any coating operation in which coating is applied to the surface of some component or surface of a fully assembled motor vehicle or trailer intended for on-road use including, but not limited to, components or surfaces on automobiles and light-duty trucks that have been repaired after a collision or otherwise repainted, fleet delivery trucks, and motor homes and other recreational vehicles (including camping trailers and fifth wheels). Assembled on-road vehicle coating includes the concurrent coating of parts of the assembled on-road vehicle that are painted off-vehicle to protect systems, equipment, or to allow full coverage. Assembled on-road vehicle coating does not include surface coating operations that meet the applicability criteria of the Automobiles and Light-Duty Trucks NESHAP. Assembled on-road vehicle coating also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles.

Automotive lamp coating means any coating operation in which coating is applied to the surface of some component of the body of an exterior automotive lamp, including the application of reflective argent coatings and clear topcoats. Exterior automotive lamps include head lamps, tail lamps, turn signals, brake lights, and side marker lights. Automotive lamp coating does not include any coating operation performed on an assembled on-road vehicle.

Capture device means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.

Capture efficiency or capture system efficiency means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.

Capture system means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings and cleaning materials occur, such as flashoff, drying, or curing. As used in this subpart, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g., depainting), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).

Coating operation means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a given quantity of coating or cleaning material is applied to a given part and all subsequent points in the affected source where organic HAP are emitted from the specific quantity of coating or cleaning material on the specific part. There may be multiple coating operations in an affected source. Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens is not a coating operation for the purposes of this subpart.

Coatings solids means the nonvolatile portion of the coating that makes up the dry film.

Continuous parameter monitoring system (CPMS) means the total equipment that may be required to meet the data acquisition and availability requirements of this subpart, used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.

Controlled coating operation means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart including but not limited to, any emission limit or operating limit or work practice standard;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emission limit, or operating limit, or work practice standard in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Emission limitation means the aggregate of all requirements associated with a compliance option including emission limit, operating limit, work practice standard, etc.

Enclosure means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

Exempt compound means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).

Facility maintenance means the routine repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.

General use coating means any coating operation that is not an automotive lamp, TPO, or assembled on-road vehicle coating operation.

Hobby shop means any surface coating operation, located at an affected source, that is used exclusively for personal, noncommercial purposes by the affected source's employees or assigned personnel.

Manufacturer's formulation data means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in §63.4541. Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.

Mass fraction of coating solids means the ratio of the mass of solids (also known as the mass of nonvolatiles) to the mass of a coating in which it is contained; kg of coating solids per kg of coating.

Mass fraction of organic HAP means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as kg of organic HAP per kg of material.

Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

Non-HAP coating means, for the purposes of this subpart, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

Organic HAP content means the mass of organic HAP emitted per mass of coating solids used for a coating calculated using Equation 1 of §63.4541. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, organic HAP content is the mass of organic HAP that is emitted, rather than the organic HAP content of the coating as it is received.

Permanent total enclosure (PTE) means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.

Personal watercraft means a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or

persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

Plastic part and product means any piece or combination of pieces of which at least one has been formed from one or more resins. Such pieces may be solid, porous, flexible or rigid.

Protective oil means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Reactive adhesive means adhesive systems composed, in part, of volatile monomers that react during the adhesive curing reaction, and, as a result, do not evolve from the film during use. These volatile components instead become integral parts of the adhesive through chemical reaction. At least 70 percent of the liquid components of the system, excluding water, react during the process.

Research or laboratory facility means a facility whose primary purpose is for research and development of new processes and products, that is conducted under the close supervision of technically trained personnel, and is not engaged in the manufacture of final or intermediate products for commercial purposes, except in a *de minimis* manner.

Responsible official means responsible official as defined in 40 CFR 70.2.

Startup, initial means the first time equipment is brought online in a facility.

Surface preparation means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called depainting.

Temporary total enclosure means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.

Thermoplastic olefin (TPO) means polyolefins (blends of polypropylene, polyethylene and its copolymers). This also includes blends of TPO with polypropylene and polypropylene alloys including, but not limited to, thermoplastic elastomer (TPE), TPE polyurethane (TPU), TPE polyester (TPEE), TPE polyamide (TPAE), and thermoplastic elastomer polyvinyl chloride (TPVC).

Thermoplastic olefin (TPO) coating means any coating operation in which the coatings are components of a system of coatings applied to a TPO substrate, including adhesion promoters, primers, color coatings, clear coatings and topcoats. Thermoplastic olefin coating does not include the coating of TPO substrates on assembled on-road vehicles.

Thinner means an organic solvent that is added to a coating after the coating is received from the supplier.

Total volatile hydrocarbon (TVH) means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.

Uncontrolled coating operation means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.

Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100(s).

Wastewater means water that is generated in a coating operation and is collected, stored, or treated prior to being discarded or discharged.

Table 2 to Subpart PPPP of Part 63—Applicability of General Provisions to Subpart PPPP of Part 63

You must comply with the applicable General Provisions requirements according to the following table.

Citation	Subject	Applicable to	subpart PPPP	Explanation
§ 63.1(a)(1)-(14)	General Applicability.	Yes.		
§ 63.1(b)(1)-(3)	Initial Applicability Determination.	Yes.		Applicability to subpart PPPP is also specified in § 63.4481.
§ 63.1(c)(1)	Applicability After Standard Established.	Yes.		
§ 63.1(c)(2)-(3)	Applicability of Permit Program for Area Sources.	No.		Area sources are not subject to subpart PPPP.
§ 63.1(c)(4)-(5)	Extensions and Notifications.	Yes.		
§ 63.1(e)	Applicability of Permit Program Before Relevant Standard is Set.	Yes.		
§ 63.2	Definitions	Yes.		Additional definitions are specified in § 63.4581.
§ 63.3(a)-(c)	Units and Abbreviations.	Yes.		
§ 63.4(a)(1)-(5)	Prohibited Activities.	Yes.		
§ 63.4(b)-(c)	Circumvention/ Severability.	Yes.		
§ 63.5(a)	Construction/ Reconstruction.	Yes.		
§ 63.5(b)(1)-(6)	Requirements for Existing, Newly Constructed, and Reconstructed Sources.	Yes.		
§ 63.5(d)	Application for Approval of Construction/ Reconstruction.	Yes.		
§ 63.5(e)	Approval of Construction/ Reconstruction.	Yes.		
§ 63.5(f)	Approval of Construction/ Reconstruction Based on Prior State Review.	Yes.		
§ 63.6(a)	Compliance With Standards and Maintenance Requirements.	Yes.		
§ 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources.	Yes.		Section 63.4483 specifies the compliance dates.
§ 63.6(c)(1)-(5)	Compliance Dates for Existing Sources.	Yes.		Section 63.4483 specifies the compliance dates.
§ 63.6(e)(1)-(2)	Operation and Maintenance.	Yes.		
§ 63.6(e)(3)	Startup, Shutdown, and Malfunction Plan.	Yes.		Only sources using an add-on control device to comply with the standard must complete startup, shutdown, and malfunction plans.
§ 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction.	Yes.		Applies only to sources using an add-on control device to comply with the standard.
§ 63.6(f)(2)-(3)	Methods for Determining Compliance.	Yes.		
§ 63.6(g)(1)-(3)	Use of an Alternative Standard.	Yes.		
§ 63.6(h)	Compliance With Opacity/Visible Emission Standards.	No.		Subpart PPPP does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).
§ 63.6(i)(1)-(16)	Extension of Compliance.	Yes.		
§ 63.6(j)	Presidential Compliance Exemption.	Yes.		

§ 63.7(a)(1).....	Performance Test Requirements_Applicability	Yes.....	Applies to all affected sources. Additional requirements for performance testing are specified in §§ 63.4564, 63.4565, and 63.4566.
§ 63.7(a)(2).....	Performance Test Requirements_Dates.	Yes.....	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standards. Section 63.4560 specifies the schedule for performance test requirements that are earlier than those specified in § 63.7(a)(2).
§ 63.7(a)(3).....	Performance Tests Required By the Administrator.	Yes.	
§ 63.7(b)-(e).....	Performance Test Requirements_Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test.	Yes.....	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standards.
§ 63.7(f).....	Performance Test Requirements_Use Alternative Test Method.	Yes.....	Applies to all test methods except those of used to determine capture system efficiency.
§ 63.7(g)-(h).....	Performance Test Requirements_Data Analysis, Recordkeeping, Reporting, Waiver of Test.	Yes.....	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standards.
§ 63.8(a)(1)-(3).....	Monitoring Requirements_Applicability.	Yes.....	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standards. Additional requirements for monitoring are specified in § 63.4568.
§ 63.8(a)(4).....	Additional Monitoring Requirements.	No.....	Subpart PPPP does not have monitoring requirements for flares.
§ 63.8(b).....	Conduct of Monitoring.	Yes.	
§ 63.8(c)(1)-(3).....	Continuous Monitoring Systems (CMS) Operation and Maintenance.	Yes.....	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in § 63.4568.
§ 63.8(c)(4).....	CMS.....	No.....	Section 63.4568 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
§ 63.8(c)(5).....	COMS.....	No.....	Subpart PPPPdoes not have opacity or visible emission standards.

§ 63.8(c)(6).....	CMS Requirements.....	No.....	Section 63.4568 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.
§ 63.8(c)(7).....	CMS Out-of-Control Periods.	Yes.	
§ 63.8(c)(8).....	CMS Out-of-Control Periods and Reporting.	No.....	Section 63.4520 requires reporting of CMS out-of-control periods.
§ 63.8(d)-(e).....	Quality Control Program and CMS Performance Evaluation.	No.....	Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.8(f)(1)-(5).....	Use of an Alternative Monitoring Method.	Yes.	
§ 63.8(f)(6).....	Alternative to Relative Accuracy Test.	No.....	Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.8(g)(1)-(5).....	Data Reduction.....	No.....	Sections 63.4567 and 63.4568 specify monitoring data reduction.
§ 63.9(a)-(d).....	Notification Requirements.	Yes.	
§ 63.9(e).....	Notification of Performance Test.	Yes.....	Applies only to capture system and add-on control device performance tests at sources using these to comply with the standards.
§ 63.9(f).....	Notification of Visible Emissions/Opacity Test.	No.....	Subpart PPPP does not have opacity or visible emission standards.
§ 63.9(g)(1)-(3).....	Additional Notifications When Using CMS.	No.....	Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.9(h).....	Notification of Compliance Status.	Yes.....	Section 63.4510 specifies the dates for submitting the notification of compliance status.
§ 63.9(i).....	Adjustment of Submittal Deadlines.	Yes.	
§ 63.9(j).....	Change in Previous Information.	Yes.	
§ 63.10(a).....	Recordkeeping/Reporting Applicability and General Information.	Yes.	
§ 63.10(b)(1).....	General Recordkeeping Requirements.	Yes.....	Additional requirements are specified in §§ 63.4530 and 63.4531.
§ 63.10(b)(2) (i)-(v).....	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS.	Yes.....	Requirements for startup, shutdown, and malfunction records only apply to add-on control devices used to comply with the standards.
§ 63.10(b)(2) (vi)-(xi).....	Yes.	
§ 63.10(b)(2) (xii).....	Records.....	Yes.	
§ 63.10(b)(2) (xiii).....	No.....	Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.10(b)(2) (xiv).....	Yes.	
§ 63.10(b)(3).....	Recordkeeping Requirements for Applicability Determinations.	Yes.	
§ 63.10(c)(1)-(6).....	Additional Recordkeeping Requirements for Sources with CMS.	Yes.....	
§ 63.10(c)(7)-(8).....	No.....	The same records are required in § 63.4520(a)(7).
§ 63.10(c)(9)-(15).....	Yes.	
§ 63.10(d)(1).....	General Reporting Requirements.	Yes.....	Additional requirements are specified in § 63.4520.
§ 63.10(d)(2).....	Report of Performance Test Results.	Yes.....	Additional requirements are specified in § 63.4520(b).
§ 63.10(d)(3).....	Reporting Opacity or	No.....	Subpart PPPP does not

	Visible Emissions Observations.		require opacity or visible emissions observations.
§ 63.10(d)(4).....	Progress Reports for Sources With Compliance Extensions.	Yes.	
§ 63.10(d)(5).....	Startup, Shutdown, and Malfunction Reports.	Yes.....	Applies only to add-on control devices at sources using these to comply with the standards.
§ 63.10(e)(1)-(2).....	Additional CMS Reports	No.....	Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.10(e)(3).....	Excess Emissions/CMS Performance Reports.	No.....	Section 63.4520(b) specifies the contents of periodic compliance reports.
§ 63.10(e)(4).....	COMS Data Reports.....	No.....	Subpart PPPP does not specify requirements for opacity or COMS.
§ 63.10(f).....	Recordkeeping/Reporting Waiver.	Yes.	
§ 63.11.....	Control Device Requirements/Flares.	No.....	Subpart PPPP does not specify use of flares for compliance.
§ 63.12.....	State Authority and Delegations.	Yes.	
§ 63.13.....	Addresses.....	Yes.	
§ 63.14.....	Incorporation by Reference.	Yes.	
§ 63.15.....	Availability of Information/Confidentiality.	Yes.	

Table 3 to Subpart PPPP of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from table 4 to this subpart if neither the name or CAS number match.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
1. Toluene.....	108-88-3	1.0	Toluene.
2. Xylene(s).....	1330-20-7	1.0	Xylenes, ethylbenzene.
3. Hexane.....	110-54-3	0.5	n-hexane.
4. n-Hexane.....	110-54-3	1.0	n-hexane.
5. Ethylbenzene.....	100-41-4	1.0	Ethylbenzene.
6. Aliphatic 140.....		0	None.
7. Aromatic 100.....		0.02	1% xylene, 1% cumene.
8. Aromatic 150.....		0.09	Naphthalene.
9. Aromatic naphtha.....	64742-95-6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent.....	64742-94-5	0.1	Naphthalene.
11. Exempt mineral spirits.....	8032-32-4	0	None.
12. Ligroines (VM & P).....	8032-32-4	0	None.
13. Lactol spirits.....	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit.....	64742-82-1	0	None.
15. Mineral spirits.....	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha.....	64742-48-9	0	None.
17. Hydrotreated light distillate..	64742-47-8	0.001	Toluene.
18. Stoddard solvent.....	8052-41-3	0.01	Xylenes.
19. Super high-flash naphtha.....	64742-95-6	0.05	Xylenes.
20. Varsol ® solvent.....	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha.....	64742-89-8	0.06	3% toluene, 3% xylene.
22. Petroleum distillate mixture...	68477-31-6	0.08	4% naphthalene, 4% biphenyl.

Table 4 to Subpart PPPP of Part 63— Default Organic HAP Mass Fraction for Petroleum Solvent Groups ^a

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic ^b	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic ^c	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

^a Use this table only if the solvent blend does not match any of the solvent blends in Table 3 to this subpart by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.

^b Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

^c Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

Appendix A to Subpart PPPP of Part 63—Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives

1.0 Applicability and Principle

1.1 *Applicability*: This method applies to the determination of weight volatile matter content and weight solids content for most one-part or multiple-part reactive adhesives. Reactive adhesives are composed, in large part, of monomers that react during the adhesive curing reaction, and, as a result, do not volatilize. The monomers become integral parts of the cured adhesive through chemical reaction. At least 70 weight percent of the system, excluding water and non-volatile solids such as fillers, react during the process. This method is not appropriate for cyanoacrylates. For cyanoacrylates, South Coast Air Quality Management District Test Method 316B should be used. This method is not appropriate for one-part moisture cure urethane adhesives or for silicone adhesives. For one-part moisture cure urethane adhesives and for silicone adhesives, EPA Method 24 should be used.

1.2 *Principle*: One-part and multiple-part reactive adhesives undergo a reactive conversion from liquid to solid during the application and assembly process. Reactive adhesives are applied to a single surface, but then are usually quickly covered with another mating surface to achieve a bonded assembly. The monomers employed in such systems typically react and are converted to non-volatile solids. If left uncovered, as in a Method 24 (ASTM D2369) test, the reaction is inhibited by the presence of oxygen and volatile loss of the reactive components competes more heavily with the cure reaction. If this were to happen under normal use conditions, the adhesives would not provide adequate performance. This method minimizes this undesirable deterioration of the adhesive performance.

2.0 Materials and Apparatus

2.1 Aluminum foil, aluminum sheet, non-leaching plastic film or non-leaching plastic sheet, approximately 3 inches by 3 inches. Precondition the foil, film, or sheet for 30 minutes in an oven at 110 ± 5 degrees Celsius and store in a desiccator prior to use. Use tongs or rubber gloves or both to handle the foil, film, or sheet.

2.2 Flat, rigid support panels slightly larger than the foil, film, or sheet. Polypropylene with a minimum thickness of 1/8 inch is recommended for the support panels. Precondition the support panels for 30 minutes in an oven at 110 ± 5 degrees Celsius and store in a desiccator prior to use. Use tongs or rubber gloves or both to handle the support panels.

2.3 Aluminum spacers, 1/8 inch thick. Precondition the spacers for 30 minutes in an oven at 110 ± 5 degrees Celsius and store in a desiccator prior to use. Use tongs or rubber gloves or both to handle the spacers.

2.4 Forced draft oven, type IIA or IIB as specified in ASTM E145–94 (Reapproved 2001), “Standard Specification for Gravity-Convection and Forced-Ventilation Ovens” (incorporated by reference, see §63.14).

2.5 Electronic balance capable of weighing to ± 0.0001 grams (0.1 mg).

2.6 Flat bottom weight (approximately 3 lbs) or clamps.

Material and Apparatus Notes

1—The foil, film, or sheet should be thick or rigid enough so that it can be easily handled in the test procedure.

3.0 Procedure

3.1 Two procedures are provided. In Procedure A the initial specimen weight is determined by weighing the foil, film, or sheet before and after the specimen is dispensed onto the foil, film, or

sheet. In Procedure B the initial specimen weight is determined by weighing the adhesive cartridge (kit) before and after the specimen is dispensed.

3.2 At least four test specimens should be run for each test material. Run the test at room temperature, 74 degrees Fahrenheit (23 degrees Celsius).

Procedure A

1. Zero electronic balance.
2. Place 2 pieces of aluminum foil (or aluminum sheet, plastic film, or plastic sheet) on scale.
3. Record weight of aluminum foils. (A).
4. Tare balance.
5. Remove top piece of aluminum foil.
6. Dispense a 10 to 15 gram specimen of premixed adhesive onto bottom piece of aluminum foil. Place second piece of aluminum foil on top of the adhesive specimen to make a sandwich.
7. Record weight of sandwich (specimen and aluminum foils). (B).
8. Remove sandwich from scale, place sandwich between two support panels with aluminum spacers at the edges of the support panels to make a supported sandwich. The spacers provide a standard gap. Take care to mate the edges.
9. Place the supported sandwich on a flat surface.
10. Place the weight on top of the supported sandwich to spread the adhesive specimen to a uniform thickness within the sandwich. Check that no adhesive squeezes out from between the pieces of aluminum foil or through tears in the aluminum foil.
11. Allow to cure 24 hours.
12. Remove the sandwich from between the support panels. Record the weight of the sandwich. This is referred to as the 24 hr weight. (C).
13. Bake sandwich at 110 degrees Celsius for 1 hour.
14. Remove sandwich from the oven, place immediately in a desiccator, and cool to room temperature. Record post bake sandwich weight. (D).

Procedure B

1. Zero electronic balance.
2. Place two pieces of aluminum foil (or aluminum sheet, plastic film, or plastic sheet) on scale.
3. Record weight of aluminum foils. (A).
4. Tare balance.
5. Place one support panel on flat surface. Place first piece of aluminum foil on top of this support panel.
6. Record the weight of a pre-mixed sample of adhesive in its container. If dispensing the adhesive from a cartridge (kit), record the weight of the cartridge (kit) plus any dispensing tips. (F).
7. Dispense a 10 to 15 gram specimen of mixed adhesive onto the first piece of aluminum foil. Place second piece of aluminum foil on top of the adhesive specimen to make a sandwich.
8. Record weight of the adhesive container. If dispensing the adhesive from a cartridge (kit), record the weight of the cartridge (kit) plus any dispensing tips. (G).
9. Place the aluminum spacers at the edges of the bottom support panel polypropylene sheet. The spacers provide a standard gap.
10. Place the second support panel on top of the assembly to make a supported sandwich. Take care to mate the edges.
11. Place the supported sandwich on a flat surface.

12. Place the weight on top of the supported sandwich to spread the adhesive specimen to a uniform thickness within the sandwich. Check that no adhesive squeezes out from between the pieces of aluminum foil or through tears in the aluminum foil.
13. Allow to cure 24 hours.
14. Remove the sandwich from between the support panels. Record the weight of the sandwich. This is referred to as the 24 hr weight. (C).
15. Bake sandwich at 110 degrees Celsius for 1 hour.
16. Remove sandwich from the oven, place immediately in a desiccator, and cool to room temperature.
17. Record post-bake sandwich weight. (D).

Procedural Notes

- 1—The support panels may be omitted if the aluminum foil (or aluminum sheet, plastic film, or plastic sheet) will not tear and the adhesive specimen will spread to a uniform thickness within the sandwich when the flat weight is placed directly on top of the sandwich.
- 2—Clamps may be used instead of a flat bottom weight to spread the adhesive specimen to a uniform thickness within the sandwich.
- 3—When dispensing from a static mixer, purging is necessary to ensure uniform, homogeneous specimens. The weighing in Procedure B, Step 6 must be performed after any purging.
- 4—Follow the adhesive manufacturer's directions for mixing and for dispensing from a cartridge (kit).

4.0 Calculations

4.1 The total weight loss from curing and baking of each specimen is used to determine the weight percent volatile matter content of that specimen

Procedure A

- Weight of original specimen (S) = (B) - (A)
 Weight of post-bake specimen (P) = (D) - (A)
 Total Weight Loss (L) = (S) - (P)

Procedure B

- Weight of original specimen (S) = (F) - (G)
 Weight of post-bake specimen (P) = (D) - (A)
 Total Weight Loss (L) = (S) - (P)

Procedure A and Procedure B

Weight Percent Volatile Matter Content

$$(V) = [(Total\ weight\ loss)/(Initial\ specimen\ weight)] \times 100 = [(L)/(S)] \times 100$$

4.2 The weight volatile matter content of a material is the average of the weight volatile matter content of each specimen of that material. For example, if four specimens of a material were tested, then the weight percent volatile matter content for that material is:

$$V = [V1 + V2 + V3 + V4]/4$$

Where:

V_i = the weight percent volatile matter content of specimen i of the material.

4.3 The weight percent solids content of the material is calculated from the weight percent volatile content of the material.

$$Weight\ Percent\ Solids\ Content\ (N) = 100 - (V)$$

Calculation Notes

1—The weight loss during curing and the weight loss during baking may be calculated separately. These values may be useful for identifying sources of variation in the results obtained for different specimens of the same material.

2—For both Procedure A and Procedure B, the weight loss during curing is $(S) - [(C) - (A)]$ and the weight loss during baking is $(C) - (D)$.

VI. Appendix 2: IDNR Administrative Consent Order No. 2004-AQ-68

IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE ORDER

IN THE MATTER OF: CDI, LLC	ADMINISTRATIVE CONSENT ORDER NO. 2004-AQ-68
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TO: CDI, LLC
David Nagle, Registered Agent
305 Nerem Drive South
Forest City, Iowa 50436

CDI, LLC
Madonna McGrath
Baker & Daniels
300 North Meridian Street
Suite 2700
Indianapolis, Indiana 46204-1782

I. SUMMARY

This consent order is entered into between CDI, LLC, (CDI) and the Iowa Department of Natural Resources (DNR) for the purpose of resolving issues relating to CDI, LLC's, failure to comply with Hazardous Air Pollutant (HAP) conditions in air quality construction permits issued by DNR and issues relating to CDI, LLC's failure to comply with the HAP emission reduction requirements contained in Section 112(g) of the Clean Air Act and 40 Code of Federal Regulations (CFR), Part 63, Subpart B, which has been adopted by reference by DNR at 567 Iowa Administrative Code (IAC) 23.1(4)(b)(1). The parties desire to avoid litigation and settle without hearing or adjudication of any issue of fact or law.

II. STATEMENT OF FACTS

1. CDI has a facility located at 305 Nerem Drive South in Forest City, Iowa. CDI paints mobile homes. Some of the sources of emissions to the outside atmosphere at this facility include paint booths, paint kitchens, and drying ovens. CDI's Forest City facility began operating on September 27, 2002.

2. CDI failed to comply with the Hazardous Air Pollutant (HAP) usage limits contained in its air quality construction permits. On November 19, 2003, Glenn Carper of DNR Field Office 2 conducted an air quality inspection at CDI. During this inspection, Mr. Carper documented violations of eleven construction permits containing plant-wide emission limits. According to condition 14 of each of the construction permits issued by DNR on September 16, 2002, the maximum total usage of HAP-

**IOWA DEPARTMENT OF NATURAL RESOURCES
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ISSUED TO: CDI, LLC.**

emitting substances (paints and cleaning solvents) for emission points permitted as part of Project No. 02-355 should not exceed 9.4 tons per year for a single HAP or 24.4 tons per year for combined HAPs, calculating each operating day on a 365-day rolling total. The following table summarizes the construction permits affected.

Construction Permit No.	Emission Point No.	Emission Units
02-A-720-P	EP MR-1	Paint Mix Room
02-A-479-P	EP BC 1	Basecoat Paint Booth and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-480-P	EP BC 2	Basecoat Paint Booth and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-481-P	EP TC 1	Topcoat Paint Booth 1 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-482-P	EP TC 2	Topcoat Paint Booth 1 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-483-P	EP TC 3	Topcoat Paint Booth 2 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-484-P	EP TC 4	Topcoat Paint Booth 2 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-485-P	EP TC 5	Topcoat Paint Booth 3 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-486-P	EP TC 6	Topcoat Paint Booth 3 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-487-P	EP E 1	Sanding Area Exhaust, Stack 1
02-A-488-P	EP E 2	Sanding Area Exhaust, Stack 2

The records observed by Mr. Carper at the facility indicated that CDI's total combined HAP usage from January through October 2003 was 38.55 tons. When the amount of HAPs recycled (6.14 tons) is removed, the actual amount of HAPs emitted into the outside atmosphere during this period was 32.41 tons. On November 26, 2003, DNR issued a Notice of Violation letter to CDI for the violations discovered during the November 19, 2003, inspection.

3. In addition to CDI's failure to comply with the conditions of its construction permits, CDI violated the provisions of Section 112(g) of the Clean Air Act (42 United States Code § 7412) when CDI exceeded its HAP usage limit of 24.4 tons per year. Section 112(g) of the Clean Air Act is intended, in part, to ensure that emissions of HAPs do not increase in the interim period if a facility is constructed or reconstructed

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before the Environmental Protection Agency (EPA) issues a final Maximum Achievable Control Technology (MACT) regulation or an air toxics regulation for that particular category of sources or facilities. According to 567 IAC 22.1(1)(b), the owner or operator of a new or reconstructed major source of hazardous air pollutants subject to Section 112(g) must apply to DNR for a construction permit which would require that MACT be applied to the new or reconstructed major source. According to 567 IAC 23.1(4)(b)(1), these construction permit applications shall contain applications for case-by-case MACT determinations. The Section 112(g) requirements are applicable to new or reconstructed equipment with the potential to emit more than 10 tons per year of a single HAP or 25 tons per year of combined HAPs.

4. When CDI began operations at its Forest City, Iowa, facility on September 27, 2002, it had established synthetic minor status for Section 112(g), due to the HAP usage limit of 9.4 tons for single HAPs and 24.4 tons per year for combined HAPs contained in its permits. However, when CDI failed to comply with its permitted limits and exceeded 25 tons per year of combined HAP emissions, CDI became subject to the requirements of Section 112(g).

5. On December 4, 2002, EPA published a proposed MACT rule which, when final, would regulate the CDI Forest City facility. On April 19, 2004, EPA published as a final rule the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP. When CDI failed to comply with the conditions of its construction permits, CDI became subject to both Section 112(g) and these newly-adopted MACT provisions.

6. On April 21, 2004, DNR issued a Notice of Violation letter to CDI for violating Section 112(g) of the Clean Air Act. Since the issuance of the Notice of Violation letter, CDI has proposed a compliance plan which has been approved by DNR. A copy of the compliance plan is attached as Exhibit "A".

7. On May 21, 2003, DNR issued a Notice of Violation letter to CDI for failure to timely submit a Title V application. On July 22, 2004, DNR issued a Notice of Violation letter to CDI for failure to timely submit its Title V emissions inventory for emission year 2003. While no penalty is assessed for these alleged violations, the issuance of these two Notice of Violation letters indicates that CDI was specifically made aware of Iowa's air quality programs.

8. On October 7, 2004, CDI requested in an email that DNR modify its construction permits to be consistent with the requirements of Subpart PPPP. CDI currently has construction permit applications in-house at DNR for the affected emission points, but those permit applications do not address Subpart PPPP.

III. CONCLUSIONS OF LAW

1. Pursuant to the provisions of Iowa Code sections 455B.134(9) and

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ISSUED TO: CDI, LLC.**

455B.138(1), which authorize the Director to issue any order necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II (air quality), and the rules promulgated and permits issued pursuant thereto; and Iowa Code section 455B.109 and 567 Iowa Administrative Code (IAC) chapter 10, which authorize the Director to assess administrative penalties, this Department has jurisdiction to issue this order.

2. Iowa Code section 455B.133 provides the Environmental Protection Commission with authority to establish rules governing the quality of air and emission standards. Iowa Code section 455B.133(6) provides that the Commission, shall require, by rule, notice of the construction of any air contaminant source which causes or contributes to air pollution, and the submission of plans and specifications to the department, or other information deemed necessary for the installation of air contaminant sources and regulated control equipment.

3. Iowa Code sections 455B.133 and 455B.134, and 567 IAC 22.3(1), allows DNR to issue permits subject to conditions specified in writing. Such conditions may include but are not limited to emissions limits, operating conditions, fuel specifications compliance testing, continuous monitoring, and excess emissions reporting. CDI has failed to comply with some of the conditions of its construction permits, as stated above.

4. Section 112(g) of the Clean Air Act (42 United States Code § 7412) is applicable to facilities emitting more than 10 tons per year of a single HAP or more than 25 tons per year of combined HAPs. CDI is subject to the requirements of Section 112(g) because it has emitted more than 25 tons per year of combined HAPs, as stated above.

5. According to the provisions of 40 Code of Federal Regulations (CFR) Part 63, Subpart B, adopted by reference at 567 IAC 23.1(4)(b)(1), facilities subject to Section 112(g) are required to obtain an approved MACT determination from the permitting authority (DNR) for all new or reconstructed equipment with the potential to emit more than 10 tons per year of a single HAP or more than 25 tons per year of combined HAPs. CDI is subject to the requirements of these provisions because it has emitted more than 25 tons per year of combined HAPs, as stated above.

6. According to the provisions of 567 IAC 22.1(1)(b), the owner or operator of a new or reconstructed major source of hazardous air pollutants subject to Section 112(g) must apply to DNR for a construction permit which would require that MACT be applied to the new or reconstructed major source. According to the provisions of 567 IAC 23.1(4)(b)(1), construction permit applications shall contain applications for case-by-case MACT determinations.

7. CDI is an affected facility according to the provisions of the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP.

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ISSUED TO: CDI, LLC.**

IV. ORDER

THEREFORE, DNR orders and CDI agrees to the following:

1. CDI shall immediately comply with the requirements of Clean Air Act Section 112(g) at its Forest City facility by implementing one of the control strategies specified in the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP;
2. In the future, CDI shall comply with the conditions of its construction permits; and
3. Within 30 days of the date the Director signs this order, CDI shall pay a penalty of \$8,000.00.

V. WAIVER OF APPEAL RIGHTS

This administrative consent order is entered into knowingly by and with the consent of CDI, LLC. For that reason, CDI, LLC, waives its right to appeal this order pursuant to the provisions of Iowa Code section 455B.138.

VI. NO ADMISSION

CDI's entry into the terms of this Consent Order does not constitute an admission of any violations alleged herein.


VII. NONCOMPLIANCE

Failure to comply with the provisions of this order may result in the imposition of administrative penalties or referral to the Attorney General to obtain injunctive relief and civil penalties pursuant to Iowa Code section 455B.146. The Department reserves the right to request that the Attorney General initiate legal action if this order is violated.



JEFFREY R. VONK, DIRECTOR
Iowa Department of Natural Resources

Dated this 27 day of
December, 2004.



for CDI, LLC

Dated this 15 day of
December, 2004.

Exhibit "A"

Compliance Plan

CDI shall meet the requirements of Clean Air Act Section 112(g) by immediately implementing the requirements of the NESHAP for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP.

CDI shall implement the "emission rate without add-on controls" option of Subpart PPPP, as follows:

- CDI shall limit the facility's organic HAP emissions to no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.
- CDI shall use 0.00 organic HAP cleaning material and flushing solvent where possible to further reduce organic HAP emissions.
- CDI shall use as the reducer in major usage paints a reducer with 0.36 lbs of organic HAP per gallon, where possible.
- To show compliance with Clean Air Act Section 112(g), CDI shall immediately comply with the notification, recordkeeping and reporting requirements of Subpart PPPP found in 40 CFR 63.4551 (initial compliance demonstrations) and 63.4552 (continuous compliance demonstrations).