## Iowa Department of Natural Resources Title V Operating Permit

### Name of Permitted Facility: 3M (Minnesota Mining & Manufacturing Co.) Facility Location: 3406 E. Pleasant Street, Knoxville, Iowa 50138 Air Quality Operating Permit Number: 01-TV-025R3 Expiration Date: October 10, 2026 Permit Renewal Application Deadline: April 10, 2026

EIQ Number: 92-3629 Facility File Number: 63-01-001

#### **Responsible Official**

Name: Tom Buzalewski Title: Plant Manager Mailing Address: 3406 E. Pleasant Street, Knoxville, Iowa 50138 Phone #: 641-828-5500

<u>Permit Contact Person for the Facility</u>
Name: Dzung Farrell
Title: Environmental Engineering Specialist
Mailing Address: 3406 E. Pleasant Street, Knoxville, Iowa 50138
Phone #: 651-252-9880

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.

#### For the Director of the Department of Natural Resources

Mainie Stein

10/11/2021

Marnie Stein, Supervisor of Air Operating Permits Section

Date

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### Abbreviations

acfmactual cubic feet per minute
CFRCode of Federal Regulations
CEcontrol equipment
CEMcontinuous emission monitor
EIQemissions inventory questionnaire
°Fdegrees Fahrenheit
EPemission point
EUemission unit
gr./dscfgrains per dry standard cubic foot
IACIowa Administrative Code
DNRIowa Department of Natural Resources
KWkilowatts per hour
MMCF/hrmillion cubic feet per hour
MVACmotor vehicle air conditioner
NSPSnew source performance standard
ppmv
lb/hrpounds per hour
lb/MMBtupounds per million British thermal units
SCCSource Classification Codes
scfmstandard cubic feet per minute
SICStandard Industrial Classification
TPYtons per year
USEPAUnited States Environmental Protection Agency

#### Pollutants

PM	particulate matter
PM <sub>10</sub>	particulate matter ten microns and less in diameter
PM <sub>2.5</sub>	particulate matter two point five microns and less in diameter
SO <sub>2</sub>	sulfur dioxide
NO <sub>x</sub>	nitrogen oxides
VOC	volatile organic compounds
СО	carbon monoxides
HAP	hazardous air pollutants

## I. Facility Description and Equipment List

Facility Name: 3M (Minnesota Mining and Manufacturing Co.) Permit Number: 01-TV-025R3

Facility Description: Tape Manufacturing (SIC 2672)

### **Equipment List**

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
002-015	GEN 002	Emergency Generator	99-A-219
003-003	PP	Reactor	
003-020 003-051	Poly 2	Poly 2	NA
003-078	DIE CLEAN	Die Cleaning	93-A-144
	B1	Blend Tank (2878 gallons)	
	B2	Blend Tank (2878 gallons)	
	VP-Glass Silo	Vacuum Pump - Glass Silo	
	M1	Mixer	
	M2	Mixer	
	M3	Mixer	
	S1	Batch Storage Mix Tank (2878 gallons)	
	S2	Batch Storage Mix Tank (3886 gallons)	
	S3	Batch Storage Mix Tank (3886 gallons)	
	S4	Batch Storage Mix Tank (3886 gallons)	
003-097	S5	Batch Storage Mix Tank (2878 gallons)	92-A-655-S3
	S6	Batch Storage Mix Tank (2878 gallons)	
	S7	Batch Storage Mix Tank (2878 gallons)	
	SURGE1	Adhesive Mix Tank (137 gallons)	
	SURGE2	Adhesive Mix Tank (137 gallons)	
	SURGE3	Adhesive Mix Tank (137 gallons)	
	SURGE4	Adhesive Mix Tank (100 gallons)	
	SURGE5	Adhesive Mix Tank (100 gallons)	
	SURGE 6	Adhesive Mix Tank (100 gallons)	
	FLUSH1	Adhesive and IOA Flush Tank (100 gallons)	
	FLUSH2	Adhesive and IOA Flush Tank (100 gallons)	

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
003-114	CH Enclosure	ST13 Coater Head Enclosure	16-A-374-S2
003-115	CH Pan	ST13 Coater Head Pan	16-A-375-S2
003-116	Chamber Entrance	ST13 Chamber Entrance	16-A-376-S3
003-119	Chamber Exit	ST13 Chamber Exit	16-A-377-S2
003-120	Winder Exhaust	ST13 Winder Exhaust	16-A-378-S2
003-121	Compounding Area	Batch Tank, Large Surge Tank, Mix Tank, Store Tank, Weigh Tank, Small Surge Tank, Hold Tank, DM Unloader	16-A-455
	MOGUL1A	Mogul 1A	
	CR1HT2	Hold Tank #2	
	CHURN2	Churn #2	
003-111	CR2 2S	2-South Blender	07-A-1538-S4
	CR2 2N	2-North Blender	
	CR3 S3	3-South Blender	
	CR1 MT2 1NO	Compounding Mix Tank #2 Line 1N Oven	
004-005	1ND2	Line 1N Oven Line 1N Dryer 2	90-A-152-S4
	2NAD1	Line 2NA Dryer 1	
	2NAD2	Line 2NA Dryer 2	
004-006	2NBO	Line 2NB Oven	90-A-153-S8
	2NBD	Line 2NB Dryer	
	5NO1	Line 5N Oven 1	
	5NO2	Line 5N Oven 2	
004-012	6ND	Line 6N Dryer	90-A-154-S6
	5NCLEAN	Line 5N Die Cleaning	
005-054	MOGUL1A	Mogul 1	07-A-1539-S3
005-055	MOGUL1A	Mogul 1	07-A-1540-S3
005-056	MOGUL 2	Mogul 2	21-A-265
005-057	MOGUL 2	Mogul 2	21-A-265
	1NO	Line 1N Oven	
	2NAD1	Line 2NA Dryer 1	
007-005	2NAD2	Line 2NA Dryer 2	
	2NBD	Line 2NB Dryer	
	2NBO	Line 2NB Oven	
	5NO1	Line 5N Oven 1	05-A-448-S10
	5NO2	Line 5N Oven 2	
	6ND	Line 6N Dryer	
	MOGUL1A	Mogul 1	
	MOGUL 2	Mogul 2	
	CHURN2	Churn #2	

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
	CR1HT2	Hold Tank #2	
	CR1 MT2	Compounding Mix Tank #2	
	CR2 2N	2 North Blender	-
	CR2 2S	2 South Blender	_
			_
	CR3 3S	3 South Blender	
004-007	2NAS2	2NA Gravure Station 1	NA
	2NAS3	2NA Gravure Coater 2	NA
	1NS2	Coater (Internally Vented)	NA
	1NS3	ADH Coater (Internally Vented)	NA
	2NBS1	Coater (Internally Vented)	NA
004 000	2NBS2	Coater (Internally Vented)	NA
004-008	5NS1	Coater (Internally Vented)	NA
	5NS2A	Coater (Internally Vented)	NA
	6NS1	Coater (Internally Vented)	NA
	8NS1	Coater (Internally Vented)	NA
004-009	Tank 04-03	Storage Tank	98-A-662-S1
004-010	Tank 04-04	Adhesive Storage Tank	98-A-663-S1
004-011	Tank 04-05	Adhesive Storage Tank	98-A-664-S1
004-013	5NCT	5N Corona Treater Exhaust	NA
004-015	6NS2	Coater	NA
	1NADH	Hold Tank (Internally Vented)	NA
	FC3	Mix Tank (Internally Vented)	NA
	FC4	Mix Tank (Internally Vented)	NA
	SI1	Mix Tank (Internally Vented)	NA
004-018	SI2	Mix Tank (Internally Vented)	NA
	5N Tank 1	Storage Tank	NA
	5N Tank 2	Solvent Tank	NA
	Die Clean 2	Die Cleaning Station	13-A-458
004-029	2NBS3	Coater	NA
004-031			07-A-939-S1
004-034	6N Chamber	Cure Chamber	07-A-938-S2
004-055	Tank 04-01	Storage Tank	98-A-660
004-056	Tank 04-02	Storage Tank	98-A-661
004-057	Tank 04-06	Storage Tank	98-A-665
004-060	Tank 04-08	Storage Tank	98-A-667
004-061	Tank 04-07	Storage Tank	98-A-666
004-064	8NC	8N Cure Chamber	92-A-653-S4
004-065	8NCT	8N Corona Treater	94-A-545-S5
004-067	6NS1	6N-1 Plastic Adhesive Coating Chamber	95-A-290-S2
004-069	8NS1	8N Coating Station	92-A-652-S4
004-076	8NC R1 8NC R2	Coating Tank (25 gallons) Storage Tank (30 gallons)	- 92-A-654-S2
004-077	Tank 04-10	Storage Tank	93-A-152

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
004-078	Tank 04-09	Storage Tank	93-A-151-S1
004-047		Web Seal Exhaust	NA
004-079	6N Enclosure	Coater	93-A-341
004-080	8NC	8N Coating	01-A-840
004-081 004-088	8N Enclosure	8N Web Enclosure Exhaust	01-A-841
*004-085	2NB ADH	Adhesive Storage Tank	NA
004-118	Die Clean E&W	Die Cleaning Tank and Cart Cleaning Exhaust	95-A-457-S1
004-120	04-INAM-A-05	Storage Tank	00-A-824
004-123	5NCT2	5N Corona Treater #2	08-A-163-S1
005-008	Resin Dumper	Resin Dumper	76-A-271
005-000	Mch 01	Rubber Milling	1011-211
	Mch 02	Rubber Mixing	
005-018	COMPD Dumpster	Trash Dumpster	76-A-269
	Extruder	Extruding	
005-028	Mch 09	Powder Mixer	93-A-364
005-034	Mch 02	Rubber Mixing	76-A-270
*005-046	CR2 2N	Solvent/Rubber/Resin Blender	NA
*005-047	CR1 MT1	Solvent/Resin Mix Tank	NA
*005-049	CR1 HT1	Solvent Hold Tank	NA
*005-050	CR1 HT2	Solvent Tank	NA
005-051	Churn 1	Mix Tank	02-A-384-S1
007-030	Boiler 1	Boiler 1 (72 MMBtu/hr)	76-A-181-S2
007-071	GEN 007	Generator (896 bhp)	10-A-524
007-072	Boiler 2	Boiler 2	19-A-628
008-001	Pump House Boiler	Pump House Boiler Stack	Exempt
008-002	GEN 008	Firewater Diesel Pump	Exempt
*010-001	Tank 1	Solvent Storage Tank	NA
*010-002	Tank 2	Solvent Storage Tank	NA
*010-003	Tank 3	Solvent Storage Tank	NA
*010-004	Tank 4	Solvent Storage Tank	NA
*010-005	Tank 5	Solvent Storage Tank	NA
010-006	Tank 10-6	Storage Tank	NA
*010-007	Tank 7	Solvent Storage Tank	NA
010-008	Tank 10-8	Storage Tank	NA
010-013	Tank 13	Recovered Solvent Tank	94-A-451-S2
010-018	Tank 18	Glass Bubbles Storage Tank	99-A-224
019-002	7NS1	7N Maker – Coating Exhaust Station	94-A-167-S1
019-003 019-004	7NC	Cure Chamber/Dryer	NA
019-005 019-006	13JE	Extruder	NA
019-007	13JE	Extruder NA Extruder NA	

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
019-008	14JCT	Corona Treater	90-A-364-S2
019-012	7NDL1	7N Maker – Delamination Operation	94-A-166-S1
019-013	7NDM	7N Drum Pump & Mixing $(1^{st} and 2^{nd} floor)$	93-A-366 & 367
019-065	13JCT	Two-sided Corona Treater	98-A-1164-S1
022-001	AATNK	Storage Tank	NA
029-004	IMF2	IMF2	15-A-228
029-005	IMF 1 CT	Corona Treater	18-A-260
	AF7 Coater	Main Coater	
032-001	MLC #1	Top MLC Die Station	18-A-441-S1
	MLC #2	Bottom MLC Die Station	
032-002	AF7 CH	AF7 Chamber	18-A-442-S1
032-003	AF7 DL1	AF7 Delaminator	18-A-443-S1
032-020	AF7 CH2	AF7 Oven Chamber 2	20-A-225
032-021	Af7 CH3	AF7 Oven Chamber 3	20-A-226
	AF7 B1	Blend Vessel 1 (500 gal)	
	AF7 B2	Blend Vessel 2 (500 gal)	
	AF7 S1	AF7 Syrup Tank 1 (500 gal)	
032-004	AF7 S2	AF7 Syrup Tank 2 (500 gal)	19-A-416-S1
	AF7 S3	AF7 Syrup Tank 3 (500 gal)	
	AF7 S4	AF7 Syrup Tank 4 (500 gal)	
	AF7 S5	AF7 Syrup Tank 5 (500 gal)	
032-005	AF7 Poly 3	AF7 Poly 3 (30 gal)	19-A-417-S1
032-008	AF7 Surfactant 1	AF7 Surfactant 1 (90 gal)	19-A-418-S1
	AF7 M1	AF7 Mix Tank 1 (800 gal)	
032-012	AF7 M2	AF7 Mix Tank 2 (800 gal)	19-A-419-S1
	AF7 M3	AF7 Mix Tank 3 (800 gal)	
032-013	AF7 Surfactant 2	AF7 Surfactant 2 (90 gal)	19-A-420-S1
032-014	AF7 SC	AF7 Sparge Column (10 gal)	19-A-421-S1
032-015	AF7 Poly 3	AF7 Poly 3 (30 gal)	20-A-215
032-016	AF7 Pigment 1	AF7 pigment 1 (40 gal)	20-A-216
	AF7 M1	AF7 Mix Tank 1 (800 gal)	
032-017	AF7 M2	AF7 Mix Tank 2 (800 gal)	19-A-422-S1
	AF7 M3	AF7 Mix Tank 3 (800 gal)	
032-019	AF7 Pigment 2	AF7 pigment 2 (40 gal)	19-A-423-S1
	AF7 Surge 1	AF7 Surge Tank 1 (800 gal)	
	AF7 Surge 2	AF7 Surge Tank 2 (800 gal)	
032-024	AF7 Surge 3	AF7 Surge Tank 3 (500 gal)	20-A-217
	AF7 Surge 4	AF7 Surge Tank 4 (500 gal)	
	AF7 Surge 5	AF7 Surge Tank 5 (500 gal)	
022 025	AF7 Tank A121	AF7 Tank A121 (250 gal)	20 A 219
032-025	AF7 Tank A124	AF7 Tank A124 (250 gal)	20-A-218
022.026	AF7 Tank A121	AF7 Tank A121 (250 gal)	20 4 210
032-026	AF7 Tank A124	AF7 Tank A124 (250 gal)	20-A-219
032-027	AF7 Top MLC	Top MLC Day Tank (60 gal)	20-A-220
032-028	AF7 Bottom MLC	Bottom MLC Day Tank (60 gal)	20-A-221

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
032-029	AF7 H Weigh Tank	AF7 H Weigh Tank (28 gal)	20-A-222
032-029	AF7 B Weigh Tank	AF7 B Weigh Tank (28 gal)	20-A-222
	AF7 B Mix Tank	AF7 B Mix Tank (200 gal)	
032-030	AF7 B Store Tank	AF7 B Store Tank (175 gal)	20-A-223
	Transfer Rack 6	Recovered Xylene Loadout	
00X-00X	TR Comp RM1	Toluene Transfer Rack to Compounding	
	Coating MIXRM TR	Toluene Transfer Rack to Coating Mix Room	NA
	General W/O	General Piping without Electronic	
	ELC	Level Control	
	General W/ELC	General Piping with Electronic Level Control	

\* These emission points do not have emission point-specific conditions and are listed in Section IV of this permit.

## Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
019-028	Berringer
019-033	Pigment Tank
003-042	Bubble Transfer Tank A
003-043	Bubble Transfer Tank B
003-044	Silica Transfer Tank 1
003-045	Silica Transfer Tank 2
003-046	Silica Transfer Tank 3
010-021	Resin Silo 10-21
010-022	Resin Silo 10-22
1NS4	1N Hot Melt Coater
6NVP	6N Vacuum Pull Roll
7N Surf	Storage Tank (130 gallons)
Core Tank 1	7N Core Tank 1
Core Tank 2	7N Core Tank 2
DB 1 and 2	Water Based Tanks
IMF	Process heater/Grinder
CM Drum	Drum Mixing
Gen 08 Tank	Diesel fuel storage tank
Gen 07 Tank	Diesel fuel storage tank
Gen 02 Tank	Diesel fuel storage tank
Yard Diesel	Yard Diesel Tank
F Lab	Front Lab
Coating Lab	Coating Lab
ST13 LAB	ST 13 Lab
FF Lab	Focus Factory Lab
IMF Lab	IMF Lab
6N Lab	6N/8N Lab
1882 Lab	1S82 Lab
IMF Printer	IMF Printer
1N Printer	1N Printer
5N Printer	5N Printer
CR1DM	Drum Mixer
IPA	Small IPA Tank
R1 D&W	Local Exhaust
R2 D&W	Local Exhaust
Tank 10-10IOA	IOA Tank
DB 3 & 4	Cowles Mixer

## **II. Plant-Wide Conditions**

Facility Name: Minnesota Mining & Manufacturing (3M) Permit Number: 01-TV-025R3

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

#### **Permit Duration**

The term of this permit is: 5 years Commencing on: October 11, 2021 Ending on: October 10, 2026

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.

#### **Emission Limits**

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

<u>Opacity (visible emissions):</u> 40% opacity Authority for Requirement: 567 IAC 23.3(2)"d"

<u>Sulfur Dioxide (SO<sub>2</sub>):</u> 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 on or 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"

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits 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 roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) 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 public 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 be 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, fertilizer 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.
- 6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

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

#### **NESHAP Requirements**

#### 40 CFR Part 63 Subpart JJJJ

Numerous emission units at this facility are affected sources under Subparts A (General Provisions, 40 CFR \$63.1 - 40 CFR \$63.15) and JJJJ [National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating, 40 CFR \$63.3280 - 40 CFR \$63.3420] of the National Emission Standard for Hazardous Air Pollutants (NESHAP).

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart JJJJ

567 IAC 23.1(4)"cj"

#### 40 CFR Part 63 Subpart HHHHH

Many emission units at this facility are affected sources under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and HHHHH [National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, 40 CFR §63.7980 – 40 CFR §63.8105] of the National Emission Standard for Hazardous Air Pollutants (NESHAP).

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart HHHHH 567 IAC 23.1(4)"dh"

#### 40 CFR Part 63 Subpart FFFF

Many emission units at this facility are affected sources under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and FFFF [National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, 40 CFR §63.2430 – 40 CFR §63.2550] of the National Emission Standard for Hazardous Air Pollutants (NESHAP).

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart FFFF 567 IAC 23.1(4)"cf"

#### 40 CFR Part 63 Subpart DDDDD

The emissions units Boiler1, Boiler2A, and PUMPHOUSE BOILER are affected sources under Subparts A (General Provisions, 40 CFR 63.1 - 40 CFR 63.15) and the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD).

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart DDDDD

#### 40 CFR Part 63 Subpart ZZZZ

Emission units GEN 002, GEN 007, and GEN 008 are affected sources under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and ZZZZ [National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT), 40 CFR §63.6580 – 40 CFR §63.6675] of the National Emission Standard for Hazardous Air Pollutants (NESHAP).

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ 567 IAC 23.1(4)"cz"

#### 40 CFR Part 63 Subpart EEEE

Non-gasoline organic liquid storage tanks and transfer racks located at this facility are affected sources under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and EEEE [National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), 40 CFR §63.2330 – 40 CFR §63.2406] of the National Emission Standard for Hazardous Air Pollutants (NESHAP). The affected units are Tank 04-04, Tank 04-01, Tank 04-06, Tank 04-07, Tank 04-09, Tank 10-06, Tank 10-08, AATNK, Transfer Rack 6, TR Comp RM1, Coating MIXRM TR, General W/O ELC, and General W/ELC. See Appendix A for a link to the Standard. Authority for Requirement: 40 CFR Part 63 Subpart EEEE 567 IAC 23.1(4)"ce"

#### 40 CFR Part 63 Subpart KK

Emission units engaged in rotogravure printing located at this facility are affected sources under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and KK [National Emission Standards for Hazardous Air Pollutants: Printing and Publishing Industry, 40 CFR §63.820 – 40 CFR §63.839] of the National Emission Standards for Hazardous Air Pollutants (NESHAP). The affected units are 2NAD1, and 2NAD2. This facility complies with 40 CFR Part 63 Subpart KK by following the 2020 MACT for 40 CFR Part 63 JJJJ.

See Appendix A for a link to the Standard.

Authority for Requirement: 40 CFR Part 63 Subpart KK 567 IAC 23.1(4)"ak"

#### **NSPS Requirements**

#### 40 CFR Part 60 Subpart RR

The permittee is responsible for ensuring that subject coating operations follow all of the regulations specified in Subpart RR [Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR §60.440- 40 CFR§60.447] of the Standard of Performance for New Stationary Sources (NSPS), as applicable. See Appendix A for a link to the Standard. Authority for Requirement: 40 CFR 60 subpart RR 567 IAC 23.1(2)"qq"

#### 40 CFR Part 60 Subpart IIII

Emission unit GEN 007, Diesel Generator, is an affected source under Subpart A (General Provisions, 40 CFR 60.1 – 40 CFR 60.19) and Subpart IIII [Standards of Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 60.4200-60.4219] of the New Source Performance Standards (NSPS), as applicable. See Appendix A for a link to the Standard. Authority for Requirement: 40 CFR 60 Subpart IIII

567 IAC 23.1(2)"yyy"

## **III. Emission Point-Specific Conditions**

Facility Name: 3M (Minnesota Mining & Manufacturing Co.) Permit Number: **01-TV-025R3** 

#### **Emission Point ID Number: 002-015**

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material	Capacity	Permit
GEN002	<b>Emergency Generator</b>	Diesel	400 HP (1.02 MMBtu/hr)	99-A-219

#### **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: Opacity Emission Limit(s): 40% <sup>(1)</sup> Authority for Requirement: 567 IAC 23.3(2)"d" DNR Construction Permit 99-A-219

<sup>(1)</sup> If emissions above the indicator opacity (25%) are observed other than at start-up, shut-down, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.31 lb/MMBtu Authority for Requirement: DNR Construction Permit 99-A-219

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.5 lb/MMBtu Authority for Requirement: 567 IAC 23.3(3)"b" DNR Construction Permit 99-A-219

#### **Operational Limits & Requirements**

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

Hours of operation: A. This generator shall not be operated more than 500 hours per rolling twelve-month period.

Authority for Requirement: DNR Construction Permit 99-A-219

Process throughput:

B. This Generator (EU-Gen-002) shall only operate using diesel fuel.

Authority for Requirement: DNR Construction Permit 99-A-219

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. Record the hours this generator operates per month. Calculate rolling twelve-month totals.

Authority for Requirement: DNR Construction Permit 99-A-219

#### **NSPS and NESHAP Requirements**

This emergency engine is subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), as applicable. According to 40 CFR 63.6590(a)(1)(ii) this compression ignition emergency engine, located at a major source, is an existing stationary RICE as it was constructed prior to June 12, 2006.

Operation and Maintenance Requirements 40 CFR 63.6602, 63.6625, 63.6640 and Tables 2c and 6 to Subpart ZZZZ

- 1. Change oil and filter every 500 hours of operation or annually, whichever comes first. (See 63.6625(i) for the oil analysis option to extend time frame of requirements.)
- 2. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary.
- 3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 4. Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- 5. Install a non-resettable hour meter if one is not already installed.

6. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

#### Operating Limits 40 CFR 63.6640(f)

- 1. Any operation other than emergency operation, maintenance and testing and operation in non-emergency situations (*up to*) 50 hours per year is prohibited.
- 2. There is no time limit on the use of emergency stationary RICE in emergency situations.
- 3. You may operate your emergency stationary RICE up to 100 combined hours per calendar year for maintenance checks and readiness testing. See 40 CFR 63.6640(f)(2) for additional information and restrictions.
- 4. You may operate your emergency stationary RICE up to 50 hours per calendar year for non-emergency situations, but those 50 hours are counted toward the 100 hours of maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

#### Recordkeeping Requirements 40 CFR 63.6655

- 1. Keep records of the maintenance conducted on the stationary RICE.
- 2. Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. See 40 CFR 63.6655(f) for additional information.

## Notification and Reporting Requirements 40 CFR 63.6645, 63.6650 and Table 2c to Subpart ZZZZ

- 1. An initial notification is not required per 40 CFR 63.6645(a)(5).
- 2. A report may be required for failure to perform the work practice requirements on the schedule required in Table 2c. (See Footnote 1 of Table 2c for more information.)

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ 567 IAC 23.1(4)"cz"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 32 Stack Diameter (inches): 6 Stack Exhaust Flow Rate (cfm): 2960 Stack Temperature (°F): 755 Authority for Requirement: DNR Construction Permit 99-A-219

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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: 003-003, 003-020, 003-051

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
РР	Reactor	VOC, Acrylic Acid	30 gallons	NA
Poly 2	Poly 2	VOC, Acrylic Acid	30 gallons	NA

#### Associated Equipment

#### **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

#### **NSPS and NESHAP Requirements**

These emission units are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart FFFF, Miscellaneous Organic Chemical Manufacturing and 40 CFR 63 Subpart A, General Provisions, as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1 (4)"a"
	40 CFR 63 Subpart FFFF
	567 IAC 23.1(4)"cf"

#### **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: 003-097

Emission Units	Emission Unit Description	Raw Material/Fuel	Rated or Storage Capacity
B1	Blend Tank	Adhesive	400 gal/hr
B2	Blend Tank	Adhesive	400 gal/hr
VP-GLASS SILO	Vacuum Pump – Glass Silo	Inorganic Material	114 lb/hr
M1	Mixer	Adhesive	916 gallons
M2	Mixer	Adhesive	916 gallons
M3	Mixer	Adhesive	916 gallons
S1	Batch Storage Mix Tank	Adhesive	2878 gallons
S2	Batch Storage Mix Tank	Adhesive	3886 gallons
S3	Batch Storage Mix Tank	Adhesive	3886 gallons
S4	Batch Storage Mix Tank	Adhesive	3886 gallons
S5	Batch Storage Mix Tank	Adhesive	2878 gallons
S6	Batch Storage Mix Tank	Adhesive	2878 gallons
S7	Batch Storage Mix Tank	Adhesive	2878 gallons
SURGE 1	Adhesive Mix Tank	Adhesive	137 gallons
SURGE 2	Adhesive Mix Tank	Adhesive	137 gallons
SURGE 3	Adhesive Mix Tank	Adhesive	137 gallons
SURGE 4	Adhesive Mix Tank	Adhesive	100 gallons
SURGE 5	Adhesive Mix Tank	Adhesive	100 gallons
SURGE 6	Adhesive Mix Tank	Adhesive	100 gallons
FLUSH1	Adhesive and IOA Flush Tank	Adhesive, IOA	100 gallons
FLUSH2	Adhesive and IOA Flush Tank	Adhesive, IOA	100 gallons

#### Associated Equipment:

#### **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: Opacity Emission Limit(s): 40% <sup>(1)</sup> Authority for Requirement: DNR Construction Permit 92-A-655-S3 567 IAC 23.3(2)"d"

<sup>(1)</sup> If an opacity measurement exceeds the indicator opacity (25%) this facility should promptly investigate this source and make corrections. However, if after corrections are made the opacity continues to exceed the indicator opacity the Department may require a demonstration of compliance with mass emission limits, i.e. stack tests.

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf Authority for Requirement: DNR Construction Permit 92-A-655-S3 567 IAC 23.3(2)"a"

Pollutant: Volatile Organic Compounds (VOC) Emission Limit(s): 0.9 lb/hr; 3.9 tons/yr Authority for Requirement: DNR Construction Permit 92-A-655-S3

#### **Operational Limits & Requirements**

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

#### **NSPS and NESHAP Requirements**

Some of these emission units are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions, as applicable.

Some of these emission units are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart FFFF, Miscellaneous Organic Chemical Manufacturing, as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart FFFF
	567 IAC 23.1(4)"cf"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 40.1 Stack Diameter (inches): 9 Stack Exhaust Flow Rate (scfm): Natural draft Stack Temperature (°F): 72 Discharge Style: Vertical unobstructed Authority for Requirement: DNR Construction Permit 92-A-655-S3

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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: 003-114, 003-115, 003-116, 003-119, 003-120, 003-121

Emission	Emission	<b>Emission Unit</b>	Raw	Rated	Construction
Point	Unit	Description	Material	Capacity	Permit
003-114	CH Enclosure	ST13 Coater Head Enclosure	Coating	1,400 lb/hr	16-A-374-S2
003-115	CH Pan	ST13 Coater Head Pan	Coating	1,400 lb/hr	16-A-375-S2
003-116	Chamber Entrance	ST13 Chamber Entrance	Coating	1,400 lb/hr	16-A-376-S3
003-119	Chamber Exit	ST13 Chamber Exit	Coating	1,400 lb/hr	16-A-377-S2
003-120	Winder Exhaust	ST13 Winder Exhaust	Coating	1,400 lb/hr	16-A-378-S2
		Batch Tank	Coating	2,000 gallons	
		Large Surge Tank	Coating	2,000 gallons	
		Mix Tank	Coating	150 gallons	
003-121	Compounding Area	Store Tank	Coating	150 gallons	16-A-455
005-121		Weigh Tank	Coating	17 gallons	10-A-455
		Small Surge Tank	Coating	40 gallons	
		Hold Tank	Coating	150 gallons	
	-	DM Unloader	Coating	1,600 lb/hr	

Associated Equipment: ST13 Coater Line

#### **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.

Emission Point	Pollutant	lb/hr	Tons/yr	Other Limits	Authority for Requirement
003-114, 003-115, 002-116	VOC	8.69	38.1	0.20 kg VOC/kg coating solids <sup>(1)</sup>	DNR Construction Permits 16-A- 374-S2, 16-A-375-S2, 16-A-376-S3, 16-A-377-S2, 16-A-378-S2 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"
003-116, 003-119, 003-120	Total HAP	NA	NA	See Footnote 2	DNR Construction Permits 16-A- 374-S2, 16-A-375-S2, 16-A-376-S3, 16-A-377-S2, 16-A-378-S2 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"
003-121	VOC	NA	0.9 (3)	NA	DNR Construction Permit 16-A-455

<sup>(1)</sup>Calculated on a weighted average basis for one calendar month (ref. 40 CFR §60.442(a)(1)).

<sup>(2)</sup>Applicable option from 40 CFR §63.3320(b)(1) through §63.3320(b)(3)

<sup>(3)</sup> Based on 8760 hours per year operation plus a compliance margin, assuming 100% VOC content.

#### **Operating Requirements and Associated Recordkeeping**

All records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:

- A. Compliance shall be demonstrated for NSPS Subpart RR per 40 CFR §60.442, §60.443 and 40 CFR §60.444, as applicable.
  - a. Monitoring and recordkeeping for NSPS Subpart RR shall be done per 40 CFR §60.445.
  - b. All necessary records to demonstrate compliance with NSPS Subpart RR.
- B. Compliance shall be demonstrated for NESHAP Subpart JJJJ per 40 CFR §63.3370.
  - i. Recordkeeping for NESHAP Subpart JJJJ shall be done per 40 CFR §63.3400 and 40 CFR §63.3410.
- C. The facility shall record the total combined VOC emissions for EU-CH Enclosure, EU-CH Pan, EU-Chamber Entrance, EU-Chamber Exit, and EU-Winder Exhaust on a rolling 12-month basis.
- D. The facility shall record the total VOC emissions for EU-Compounding Area on a rolling 12-month basis.

Authority for Requirement: DNR Construction Permits 16-A-374-S2, 16-A-375-S2, 16-A-376-S3, 16-A-377-S2, 16-A-378-S2, 16-A-455 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq" 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

#### **NSPS and NESHAP Requirements**

Emission Units CH Enclosure, CH Pan, Chamber Entrance, Chamber Exit and Winder Exhaust are subject to 40 CFR 60 Subpart A, General Conditions and Subpart RR, Pressure Sensitive Tape and Label Surface Coating Operations, as applicable. These EUs are also subject to 40 CFR 63 Subpart A, General Conditions and Subpart JJJJ, Paper and other Web Coating, as applicable.

Authority for Requirement: DNR Construction Permits 16-A-374-S2, 16-A-375-S2, 16-A-376-S3, 16-A-377-S2, 16-A-378-S2 40 CFR 60 Subpart A 567 IAC 23.1(a) 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq" 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

#### **Emission Point Characteristics**

These emission points shall conform to the specifications listed below.

Emission Point	Stack Height, feet	Discharge Style	Stack Opening, inches	Stack Temperature, °F	Exhaust Flowrate, SCFM
003-114	44	Vertical unobstructed	16	72	3,000
003-115	44	Vertical unobstructed	5	72	250
003-116	44	Vertical unobstructed	6	72	400
003-119	44	Vertical unobstructed	14	72	1,300
003-120	44	Vertical unobstructed	30	72	1,400
003-121	59	Vertical unobstructed	1	72	25

Authority for Requirement: DNR Construction Permits 16-A-374-S2, 16-A-375-S2, 16-A-376-S3, 16-A-377-S2, 16-A-378-S2, 16-A-455

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

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: 003-111, 004-005, 004-006, 004-012, 005-054, 005-055, 005-056, 005-057 and 007-005

Emission Point	Emission Unit	<u>t: Coating Lines L</u> Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
	MOGUL 1A	Mogul 1		Toluene, MEK, VOC	350 pound/hour	07-A-1538-S4
	CHURN2	Churn #2		Toluene, VOC	35 gallons/hour	
003-111 (Multiple	CR1HT2	Hold Tank #2	NA	Toluene, MEK	90 gallons/hour	
Bypass Stack)	CR1MT2	Compounding Mix Tank #2	NA	Toluene, MEK	115 gallons/hour	07-A-1556-54
	CR2 2N	2 North Blender		Adhesive	560 gallons/hour	
	CR2 2S	2 South Blender		Adhesive	375 gallons/hour	
	CR3 3S	3 South Blender		Adhesive	375 gallons/hour	
004-005 (Line	1NO	Line 1N Oven	NA	Coating	2,283 pounds/hour	90-A-152-S4
1N Bypass Stack)	1ND2	Line 1N Dryer 2		Coating	360 pounds/hour	
004-006	2NAD1	Line 2NA Dryer 1	NA	Coating	1,800 feet <sup>2</sup> /hour	90-A-153-S8
(Lines 2NA	2NAD2	Line 2NA Dryer 2		Coating	1,800 feet <sup>2</sup> /hour	
and 2NB	2NBD	Line 2NB Dryer		Coating	520 pounds/hour	
Bypass Stack)	2NBO	Line 2NB Oven		Coating	2,280 pounds/hour	
	5NO1	Line 5N Oven 1		Coating	1,800 pounds/hour	
004-012 (Lines 5N and	5NO2	Line 5N Oven 2		Coating	1,800 pounds/hour	
6N Bypass	6ND	Line 6N Dryer	NA	Coating	1,855 pounds/hour	90-A-154-S6
Stack)	5NCLEAN	Line 5N Die Cleaning		Die	48 gallons/month	
005-054 (Mogul 1 Bypass Stack)	MOGUL 1A	Mogul 1	NA	Toluene, MEK, VOC	350 pounds/hour	07-A-1539-S3
005-055 (Mogul 1 Bypass Stack)	MOGUL 1A	Mogul 1	NA	Toluene, MEK, VOC	350 pounds/hour	07-A-1540-S3
005-056	MOGUL 2	Mogul 2	None	Adhesive	600 gallons	21-A-265
005-057	MOGUL 2	Mogul 2	None	Adhesive	600 gallons	21-A-266

#### Associated Equipment: Coating Lines 1N, 2NA, 2NB, 5N and 6N

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
	1NO	Line 1N Oven	-	Coating	2,283 pounds/hour	
	2NAD1	Line 2NA Dryer 1		Coating	1,800 feet <sup>2</sup> /hour	
	2NAD2	Line 2NA Dryer 2		Coating	1,800 feet <sup>2</sup> /hour	
	2NBD	Line 2NB Dryer		Coating	520 pounds/hour	
	2NBO	Line 2NB Oven		Coating	2,280 pounds/hour	
	5NO1	Line 5N Oven 1		Coating	1,800 pounds/hour	05-A-448- S10
	5NO2	Line 5N Oven 2	Regenerative Thermal Oxidizer (CE RTO)	Coating	1,800 pounds/hour	
	6ND	Line 6N Dryer		Coating	1,855 pounds/hour	
007-005	MOGUL1A	Mogul 1		Toluene, MEK, VOC	350 pound/hour	
	MOGUL 2	Mogul 2			600 gallons	
	CHURN2	Churn #2		Toluene, VOC	35 gallons/hour	
	CR1HT	Hold Tank #2		Toluene, MEK	90 gallons/hour	
	CR1MT2	Compounding Mix Tank #2		Toluene, MEK	115 gallons/hour	
	CR2 2N	2 North Blender		Adhesive	560 gallons/hour	
	CR2 2S	2 South Blender		Adhesive	375 gallons/hour	
	CR3 3S	3 South Blender	er	Adhesive	375 gallons/hour	

### **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.

Emission Limits #1 - National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart
JJJJ

Emission Unit <sup>(1)</sup>	Pollutant	Limits <sup>(2)</sup>	Authority for Requirement
1NO		No more than 5% of the organic HAP applied for	
2NBD		each month (95% reduction); or	
2NBO	Organic HAP	No more than 4% of the mass of coating	<b>DNR</b> Construction
ZINDU		materials applied for each month; or	Permits 05-A-448-S10,
5NO1		No more than 20% of the mass of coating solids	90-A-152-S4, 90-A-
51101		applied for each month.	153-S8, 90-A-154-S6,
5NO2	IIAI	The outlet organic HAP concentration from the	40 CFR §63.3280 -
		oxidizer shall not exceed 20 parts per million by	§63.3420, 567 IAC
6ND		volume (ppmv) by compound on a dry basis and	23.1(4)"cj"
		the efficiency of the capture system shall be	
		100%.	

<sup>(1)</sup> The affected source under NESHAP Subpart JJJJ at Plant No. 63-01-001 is the collection of web coating lines: (1) regulated by this permit and routed to the Regenerative Thermal Oxidizer (RTO): 1N Coater, 2NA Coater, 2NB Coater, 5N Coater and 6N Coater.

<sup>(2)</sup> Emission limits shall apply collectively across all the web coating lines and not individually by emission unit or separately to the RTO. Compliance with the applicable limit shall be demonstrated per 40 CFR §63.3370.

**Emission Limits #2** – National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart HHHHH

Emission Unit <sup>(1)</sup>	Pollutant	Limits <sup>(2)</sup>	Authority for Requirement
CHURN2		Comply with each applicable emission limit and work practice standard in Tables 1 through 5 to Subpart HHHHH of Part 63; <b>or</b>	DNR Construction Permits 05-A-448- S10, 07-A-1538-S4,
CR1 MT2	Organic HAP	Comply with the requirements in 40 CFR §63.8050 (organic HAP emissions averaging); or	07-A-1539-S3, 07-A- 1540-S3, 40 CFR §63.8000 -§63.8055, 40 CFR 63 Subpart
CR2 2N		Comply with the requirements in 40	40 СРК 65 Subpart ННННН,
CR2 2S CR3 3S		CFR §63.8055 (weight percent organic HAP limit in coating products).	567 IAC 23.1(4)" <i>dh</i> "

<sup>(1)</sup> Per 40 CFR §63.7985(d)(2), each of the emission units listed in this table is exempt from the requirements in Subpart HHHHH of Part 63 when it is used as an "affiliated operation" to any of the web coating lines located at this facility that are subject to Subpart KK or Subpart JJJJ of 40 CFR Part 63. Except when it is an affiliated operation, each unit is subject to Subpart HHHHH only when it is used to manufacture a coating that involves processing, using, or producing a HAP, in accordance with 40 CFR §63.7985(a).

Emission Unit	Pollutant	Limits	Authority for Requirement
1NO			
2NAD1			
2NAD2			
2NBD	Valatila Onzania Companyada		DNR Construction Permits 05-A-
2NBO	Volatile Organic Compounds (VOC)	2000 tons/year	448-S9, 90-A-152-S4, 90-A-153-
5NO1		-	S8, 90-A-154-S6
5NO2			
6ND			
5NCLEAN			

#### Emission Limits #3 – Combined Emissions

#### Emission Limits #4 – Per Emission Point

Emission Point <sup>(1)</sup>	Opacity	Particulate Matter (PM <sub>10</sub> )	Particulate Matter (PM)	Sulfur Dioxide (SO <sub>2)</sub>	Authority for Requirement
007-005	40 % (2)	3.29 lb/hr	5.57 lb/hr; 0.01 gr/dscf	500 ppmv	DNR Construction Permit 05-A-448- S9, 567 IAC 23.3(2)"d", 567 IAC 23.4(13), 567 IAC 23.3(3)"e"
004-005, 004-006, 004-012	40 % (3)	NA	0.01 gr/dscf	500 ppmv	DNR Construction Permits 91-A-152- S4, 91-A-153-S8, 90-A-154-S6, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)

<sup>(1)</sup> Emission Points 003-111, 005-054, 005-055, 005-056 and 005-057 are not included in this table, because there are no individual emission limits associated with any of them.

<sup>(2)</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(3)</sup>An exceedance of the indicator opacity of 10% will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

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#### **Operating Requirements and Associated Recordkeeping**

All records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:

#### **VOC Group Emission Limit Requirements**

A. The emission units listed below shall collectively be referred to as the "VOC Affected Emission Units" for the purposes of this document.

Emission Unit Name	Emission Unit ID	Emission Point
		ID
		EP 007-005
Line 1N Oven	EU 1NO	EP 004-005
Line 2NA Dryer 1	EU 2NAD1	EP 007-005
Lille 211A Diyel 1	EU ZNADI	EP 004-006
Line 2NA Dryer 2	EU 2NAD2	EP 007-005
Lille ZINA Diyel Z	EU ZNADZ	EP 004-006
		EP 007-005
Line 2NB Dryer	EU 2NBD	EP 004-006
		EP 007-005
Line 2NB Oven	EU 2NBO	EP 004-006
		EP 007-005
Line 5N Oven 1	EU 5NO1	EP 004-012
		EP 007-005
Line 5N Oven 2	EU 5NO2	EP 004-012
Line 5N Die Cleaning	EU 5NCLEAN	EP 004-012
		EP 007-005
Line 6N Dryer	EU 6ND	EP 004-012

- B. The total VOC emissions from the operation of the "VOC Affected Emission Units" shall not exceed 2,000 tons per rolling 12-month period.
  - a. The owner or operator shall maintain records on the identification and VOC content of each VOC-containing material used in the operation of the "VOC Affected Emission Units".
  - b. The owner or operator shall maintain manufacturer and vendor provided information (Safety Data Sheets (SDS), technical data sheets, et.) for all materials used in the operation of the "VOC Affected Emission Units".
  - c. The owner or operator shall maintain daily and monthly records of the amount, in gallons, of each VOC-containing material used in the operation of the "VOC Affected Emission Units".
  - d. The owner or operator shall record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a monthly basis.
  - e. The owner or operator shall calculate and record the amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a rolling 12-month basis.

- f. The owner or operator shall implement the following procedure if the 12-month rolling total of VOC emitted from the operation of the "VOC Affected Emission Units" exceeds 1,600 tons.
  - i. The owner of operator shall record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a daily basis.
  - ii. The owner or operator shall calculate and record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a rolling 365-day basis.
  - iii. Calculation and recordkeeping of VOC emissions data collected on Saturdays and Sundays shall be conducted on Mondays.
  - iv. Calculation and recordkeeping of VOC emissions shall not be required when emissions do not occur.
  - v. Daily calculations and recordkeeping of VOC shall continue until the rolling 12-month total amount drops below 1,600 tons on the last day of the month. Monthly calculations of VOC emissions from the "VOC Affected Emission Units" shall begin in the following month.

#### 567 Iowa Administrative Code (IAC) – Chapter 33 Requirements

- C. Per 567 IAC 33.3(18)"f"(4), as a result of Project Number 11-163, the owner or operator shall:
  - a. Monitor VOC emissions from coating ovens EU 5NO1 and EU 5NO2 and VOC uncaptured emissions from EU 5NS1 and EU 5NS2.
  - b. Calculate VOC annual emissions, in tons per year, on a calendar-year basis, for a period of ten (10) years following resumption of regular operations for EU 5NO1, EU 5NO2, EU 5NS1, and EU 5NS2.
  - c. The owner or operator shall maintain a record of VOC emissions calculations and VOC annual emissions, in tons per year, following resumption of regular operations for EU 5NO1, EU 5NO2, EU 5NS1, and EU 5NS2.
- D. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall maintain a written record of the information required in Condition D for a period of ten (10) years after Project Number 11-163 is completed.
- E. Per 567 IAC  $\overline{33.3(18)}$ "g", the owner or operator shall make the required written record available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).

#### National Emission Standards for Hazardous Air Pollutants Requirements

#### SUBPART KK

F. The owner or operator shall comply with the applicable requirements in 40 CFR Part 63, Subpart KK [§63.820 - §63.831], by following the requirements of Subpart JJJJ, as allowed in 40 CFR §63.3300(i).

#### SUBPART JJJJ

- G. The owner or operator shall comply with the applicable requirements in 40 CFR Part 63, Subpart JJJJ [§63.3280 §63.3420], including those not specifically mentioned in this document.
  - a. The owner or operator shall demonstrate compliance with the applicable standard in Emission Limits #2. by following the pertinent procedures in 40 CFR §63.3370.
  - b. The owner or operator shall use the Regenerative Thermal Oxidizer (CE RTO) to comply with the applicable standard in 40 CFR §63.3320, as necessary
    - i. the owner or operator shall monitor and inspect the Regenerative Thermal Oxidizer (CE RTO) as required in 40 CFR §63.3350.
  - c. The owner or operator shall comply with the notification and reporting requirements in 40 CFR §63.3400, as applicable.
  - d. The owner or operator shall maintain the records specified in 40 CFR §63.3410, as applicable on a monthly basis in accordance with the requirements of §63.10(b)(1).

#### SUBPART HHHHH

- H. The owner or operator shall comply with the applicable requirements in 40 CFR Part 63, Subpart HHHHH [§63.7980 §63.8105], including those not specifically mentioned in this document.
  - a. The owner or operator shall demonstrate compliance with the applicable standard in Emission Limits #3 by following the pertinent requirements in 40 CFR §63.8000 through §63.8030, or the alternative compliance means in §63.8050 and §63.8055.
  - b. The owner or operator shall comply with the notification, reporting, and recordkeeping requirements in 40 CFR §63.8070, §63.8075, and §63.8080, respectively, as applicable.

#### SUBPART FFFF

I. MOGUL1A is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart FFFF, Miscellaneous Organic Chemical Manufacturing and 40 CFR 63 Subpart A, General Provisions, as applicable.

#### **CONTROL EQUIPMENT REQUIREMENTS**

- J. The thermal oxidizers, dryers, and ovens shall use natural gas as the only fuel.
- K. The thermal oxidizer shall be operated at all times that process streams are vented to it and shall be maintained at a minimum operating temperature of 1,450 degrees Fahrenheit (measured as a 3-hour average).

- a. The owner or operator shall collect and record the combustion chamber temperature of the thermal oxidizer, in degrees Fahrenheit on a continuous basis.
- b. The owner or operator shall calculate and record the 3-hour average of the combustion chamber temperature in degrees Fahrenheit. If the 3-hour average combustion chamber of the thermal oxidizer falls below 1,450 degrees Fahrenheit, the owner or operator shall investigate and make any necessary corrections.
- L. The owner or operator shall inspect and maintain the thermal oxidizer according to the manufacturer's instructions and specifications.
  - a. The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment described in this document. This log shall include, but shall not limited to:
    - i. The date that any inspection and/or maintenance was performed on the control equipment;
    - ii. Any issues identified during the inspection;
    - iii. Any issues addressed during the maintenance activities;
    - iv. Any actions taken to correct operating temperature malfunctions; and
    - v. Identification of the staff member performing the maintenance or inspection.

Authority for Requirements: DNR Construction Permits 05-A-448-S10,

90-A-152-S4, 90-A-153-S8, 90-A-154-S6, 07-A-1538-S4, 07-A-1539-S3, 07-A-1540-S3 567 IAC 22.108(14)

#### **NSPS and NESHAP Requirements**

Emission Unit	Title	Туре	Authority for Requirement	
1NO				
2NBD				
2NBO			DNR Construction Permits 05-A-	
5NO1				
5NO2				
6ND				
2NAD1	General		448-S10, 90-A-152-S4, 90-A-153- S8, 00, A, 154, S6, 07, A, 1538, S4	
2NAD2	Provisions	NA	S8, 90-A-154-S6, 07-A-1538-S4, 07-A-1539-S3, 07-A-1540-S3, 40 CFR 63 Subpart A, 567 IAC 23.1(4)"a"	
MOGUL1A	FIOVISIONS			
MOGUL2				
CHURN2				
CR1 MT2				
CR2 2N				
CR2 2S				
CR3 3S				
2NAD1	NESHAP for the Printing and	Rotogravure and	DNR Construction Permits 05-A- 448-S10, 90-A-153-S8,	
2NAD2	Publishing Industry	flexographic printing	40 CFR 63 Subpart KK <sup>(1)</sup> , 567 IAC 23.1(4)"ak"	
1NO				
2NBD				
2NBO				
5NO1			DNR Construction Permits 05-A-	
5NO2	NESHAP: Paper		448-S10, 90-A-152-S4, 90-A-153-	
6ND	and Other Web	NA	S8, 90-A-154-S6, 40 CFR 63 Subpart JJJJ <sup>(2)</sup> , 567 IAC 23.1(4)"cj"	
CHURN2	Coating			
CR1 MT2				
CR2 2N	]			
CR2 2S				
CR3 3S				
MOGUL1A			DNR Construction Permits 05-A-	
MOGUL2	NESHAP Miscellaneous Chemical Manufacturing	Group 2 batch vent process	448-S10, 07-A-1538-S4, 07-A- 1539-S3, 07-A-1540-S3, 21-A- 265, 21-A-266, 40 CFR 63 Subpart FFFF <sup>(3)</sup> , 567 IAC 23.1(4)"cf"	

<sup>(1)</sup> In May 2020, the mass of the materials printed in EU 2NAD1 and EU 2NAD2 exceeded 5% of the total mass of the materials applied onto the line, and became subject to Subpart KK as it no longer met the requirements of 40 CFR §63.821(a)(2)(ii). . Per 40 CFR §63.3300(i), these emission units may continue to demonstrate compliance under Subpart JJJJ in lieu of demonstrating compliance under Subpart KK. <sup>(2)</sup> Each of the emission units listed is subject to NESHAP Subpart HHHHH only when it is used to manufacture a HAP-containing coating that will be shipped from the facility, except if the unit is an "affiliated operation" of a web coating line that is located at Plant Number 63-01-001that is subject to NESHAP Subpart KK or NESHAP Subpart JJJJ.

<sup>(3)</sup> Applies only when the reaction is shipped out and not used in house. Otherwise it is an affiliated operation for NESHAP Subpart JJJJ.

## **Emission Point Characteristics**

Emission Point	Stack Height (feet, from the ground)	Discharge Style	Stack Outlet Dimensions (inches)	Exhaust Temperature (°F)	Exhaust Flow Rate (scfm)	Construction Permit
007-005	60	Vertical unobstructed	98	655	102,500	05-A-448-S9
004-005	125	Vertical unobstructed	60	150	50,000	90-A-152-S4
004-006	125	Vertical unobstructed	60	150	50,000	90-A-153-S8
004-012	125	Vertical unobstructed	60	150	50,000	90-A-154-S6
003-111	50.3	Vertical unobstructed	10	80	5,400	07-A-1538-S4
005-054	17	Horizontal	8	70	Displacement Air	07-A-1539-S3
005-055	19	Horizontal	8	70	Displacement Air	07-A-1540-S3
005-056	20	Horizontal	10	70	Displacement Air	21-A-265
005-057	40	Vertical unobstructed	6	70	Displacement Air	21-A-266

The emission points shall conform to the specifications listed below.

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🗌
*CAM Plan requirement met through compliance with construction permit and NESH	HAP requirements. Separate
CAM Plan for VOC's not required at this time.	

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# **Emission Point ID Number: 004-007 (Internally Vented)**

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
2NAS2	2NA Gravure Station 1	Coatings	420 lb/hr
2NAS3	2NA Gravure Coater 2	Coatings	420 lb/hr

#### Associated Equipment

## **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: Volatile Organic Compounds (VOC)

<sup>(1)</sup>Emission Limit(s): Total VOC emissions from emission points 004-005, 004-006, 004-007, 004-012 (excluding emission unit 6ND), 004-029, and 007-005 shall not exceed 2000 tons per rolling twelve month period.

Authority for Requirement: DNR Construction Permits 90-A-152-S4, 90-A-153-S8, 90-A-154-S6, 05-A-448-S9 567 IAC 22.108(14)

<sup>(1)</sup> 3M Knoxville sent a letter dated 04-25-08 requesting that emission points 004-007, and 004-029 be included in this 2000 tons/year VOC limit.

Pollutant: Organic Hazardous Air Pollutants (Organic HAP) Emission Limit(s): Organic HAP emissions shall be limited per 40 CFR §63.3320(b). Authority for Requirement: 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

## **Operational Limits & Requirements**

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

A. The emission units listed below shall collectively be referred to as the "VOC Affected Emission Units" for the purposes of this document.

Emission Unit Name	Emission Unit ID	Emission Point ID
		EP 007-005
Line 1N Oven	EU 1NO	EP 004-005
Line 2NA Druger 1	EU 2NAD1	EP 007-005
Line 2NA Dryer 1	EU 2NADI	EP 004-006
Line 2NA Dryer 2	EU 2NAD2	EP 007-005
Line 2NA Diyel 2	EU 2NAD2	EP 004-006
		EP 007-005
Line 2NB Dryer	EU 2NBD	EP 004-006
		EP 007-005
Line 2NB Oven	EU 2NBO	EP 004-006
		EP 007-005
Line 5N Oven 1	EU 5NO1	EP 004-012
		EP 007-005
Line 5N Oven 2	EU 5NO2	EP 004-012
Line 5N Die Cleaning	EU 5NCLEAN	EP 004-012
		EP 007-005
Line 6N Dryer	EU 6ND	EP 004-012
2NAS2	2NA Gravure Station 1	EP 004-007
2NAS3	2NA Gravure Coater 2	EF 004-007
2NBS3	Coater	EP 004-029

- B. The total VOC emissions from the operation of the "VOC Affected Emission Units" shall not exceed 2,000 tons per rolling 12-month period.
  - a. The owner or operator shall maintain records on the identification and VOC content of each VOC-containing material used in the operation of the "VOC Affected Emission Units".
  - b. The owner or operator shall maintain manufacturer and vendor provided information (Safety Data Sheets (SDS), technical data sheets, et.) for all materials used in the operation of the "VOC Affected Emission Units".
  - c. The owner or operator shall maintain daily and monthly records of the amount, in gallons, of each VOC-containing material used in the operation of the "VOC Affected Emission Units".
  - d. The owner or operator shall record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a monthly basis.
  - e. The owner or operator shall calculate and record the amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a rolling 12-month basis.
  - f. The owner or operator shall implement the following procedure if the 12-month

rolling total of VOC emitted from the operation of the "VOC Affected Emission Units" exceeds 1,600 tons.

- i. The owner of operator shall record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a daily basis.
- ii. The owner or operator shall calculate and record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a rolling 365-day basis.
- iii. Calculation and recordkeeping of VOC emissions data collected on Saturdays and Sundays shall be conducted on Mondays.
- iv. Calculation and recordkeeping of VOC emissions shall not be required when emissions do not occur.
- v. Daily calculations and recordkeeping of VOC shall continue until the rolling 12-month total amount drops below 1,600 tons on the last day of the month. Monthly calculations of VOC emissions from the "VOC Affected Emission Units" shall begin in the following month.

Authority for Requirement: DNR Construction Permits 90-A-152-S4, 90-A-153-S8,

90-A-154-S6, 05-A-448-S9 567 IAC 22.108(14)

#### **NSPS and NESHAP Requirements**

These emission units are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart JJJJ, Paper and Other Web Coating and Subpart A, General Provisions, as applicable.

Authority for Requirement:	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

#### **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 🖂

## Emission Point ID Number: 004-008 (Internally Vented)

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
1NS2	Coater	Coating	300 lb/hr
1NS3	ADH Coater	Adhesives with VOC, Toluene	1,688 lb/hr
2NBS1	Coater	Coating with VOC, Toluene, MEK, MIBK, Xylene	1,300 lb/hr
2NBS2	Coater	Coating with VOC, Toluene, MEK, MIBK, Xylene	1,300 lb/hr
5NS1	Coater	Coatings with Toluene, MEK	750 lb/hr
5NS2A	Coater	Coatings with VOC, Toluene, and MEK	750 lb/hr
6NS1	Coater	Coating with VOC and Acrylic Acid	113 lb/hr
8NS1	Coater	Coating with VOC and Acrylic Acid	170 lb/min

#### Associated Equipment

## **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.

No applicable requirements at this time.

#### **Operational Limits & Requirements**

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

#### **NSPS and NESHAP Requirements**

These emission units are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart JJJJ, Paper and Other Web Coating and Subpart A, General Provisions, as applicable.

The emission unit 8NS1 is subject to the requirements of 40 CFR 60 Subpart RR, Pressure Sensitive Tape and Label Surface Coating Operations and Subpart A, General Provisions, as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 60 Subpart A 567 IAC 23.1(2) 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq" 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

<u>Monitoring Requirements</u> *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 🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material	Capacity	Permit
Tank 04-03	Storage Tank	Adhesive	240 gal/hr	

# **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.

None are required at this time.

## **Operational Limits & Requirements**

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

**Operating Limits** 

A. The amount of material stored in the storage tank shall not exceed 2,100,000 gallons on a rolling 12-month basis.

## **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The owner or operator shall record and maintain records of the amount of material stored in the storage tank on a rolling 12-month basis.

Authority for Requirement: DNR Construction Permit 98-A-662-S1

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 43 Stack Diameter (inches): 4 Stack Exhaust Flow Rate (scfm): Vent to atmosphere Stack Temperature (°F): 70 Discharge Style: Vertical Unobstructed Authority for Requirement: DNR Construction Permit 98-A-662-S1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material	Capacity	Permit
Tank 04-04	Adhesive Storage Tank	Adhesive	12,000 gallons	

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

## **Operating Limits**

A. The twelve month total, rolled monthly, amount of material stored in storage vessel Tank 4 (04-4) shall not exceed 2,100,000 gallons.

## **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The permit holder shall maintain records on the premises to show the twelve month total, rolled monthly, amount of material stored in storage vessel Tank 4 (04-4).

Authority for Requirement: DNR Construction Permit 98-A-663-S1

#### **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart EEEE
	567 IAC 23.1(4)"ce"

## **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 43 Stack Diameter (inches): 3 Stack Exhaust Flow Rate (scfm): Working/Breathing Loss Stack Temperature (°F): 70 Discharge Style: Vertical unobstructed Authority for Requirement: DNR Construction Permit 98-A-663-S1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material	Capacity	Permit
Tank 04-05	Adhesive Storage Tank	Adhesive	12,731gallons	98-A-664-S1

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

#### **Operating Limits**

A. The twelve month total, rolled monthly, amount of material stored in the in storage vessel Tank 5 (04-5) shall not exceed 2,100,000 gallons.

## **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The permit holder shall maintain records on the premises to show the twelve month total, rolled monthly, amount of material stored in storage vessel Tank 5 (04-5).

Authority for Requirement: DNR Construction Permit 98-A-664-S1

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 43 Stack Diameter (inches): 3 Stack Exhaust Flow Rate (scfm): Working/Breathing loss Stack Temperature (°F): Ambient Discharge Style: Vertical Unobstructed Authority for Requirement: DNR Construction Permit 98-A-664-S1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Associated Emission Unit ID Number: 5NCT

Emission Unit vented through this Emission Point: 5NCT Emission Unit Description: Corona Treater Exhaust Raw Material/Fuel: Electrical Energy

## **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

#### **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart JJJJ, Paper and Other Web Coating, as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 60 Subpart JJJJ
	567 IAC 23.1(4)"cj"

#### **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 🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated
Unit	Description	Material	Capacity
6NS2	Coater	Coatings with VOCs	

# **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: Volatile Organic Compounds (VOC) Emission Limit: 43 tons/yr for the 6N Coating Line Authority for Requirement: DNR Construction Permits 07-A-938-S2, 07-A-939-S1, 93-A-341, 95-A-290-S2

#### **Operational Limits & Requirements**

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

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

The permit holder, owner or operator of the facility shall record the total VOC emissions for the 6N-1 Coating Line on a rolling twelve (12) month basis.

Authority for Requirement: DNR Construction Permits 07-A-938-S2, 07-A-939-S1, 93-A-341, 95-A-290-S2

#### **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart JJJJ, Paper and Other Web Coating and 40 CFR 63 Subpart A, General Provisions, as applicable.

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 60 Subpart JJJJ 567 IAC 23.1(4)"cj" 40 CFR 60 Subpart A 567 IAC 23.1(2)

### **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 🖂

Emission Unit Description	Raw Material/Fuel	Rated Capacity
Hold Tank	Adhesive	100 gallons
Mix Tank	Solvent Solutions	100 gallons
Mix Tank	Solvent Solutions	100 gallons
Mix Tank	Solvent Solutions	100 gallons
Mix Tank	Solvent Solutions	100 gallons
Solvent Tank	Solvent	165 gallons
Solvent Tank	Solvent	165 gallons
Die Cleaning Station	Solvent	5 gallons
	DescriptionHold TankMix TankMix TankMix TankMix TankSolvent TankSolvent Tank	DescriptionRaw Material/FuelHold TankAdhesiveMix TankSolvent SolutionsMix TankSolvent SolutionsMix TankSolvent SolutionsMix TankSolvent SolutionsMix TankSolvent SolutionsSolvent TankSolventSolvent TankSolvent

Associated Equipment

# **Applicable Requirements**

#### For Emission Unit Die Clean 2 Only:

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

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

Pollutant: Opacity

Emission Limit(s): 40% <sup>(1)</sup>

#### Authority for Requirement: DNR Construction Permit 13-A-458

<sup>(1)</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

## For Emission Unit Die Clean 2 Only:

## **Operational Limits & Requirements**

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

- A. The solvent usage of this operation is limited to a maximum of 10,000 gallons of solvent per twelve (12) month period, rolled monthly.
- B. The VOC content of any solvent used in this operation shall not exceed 7.88 pounds per gallon.
- C. The solvents used in this operation shall not include methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. At the end of each month, record the amount (in gallons) of solvent used in this operation over the previous month.
- B. At the end of each month, record the amount (in gallons) of solvent used in this operation over the previous twelve (12) months.
- C. Maintain a copy of a SDS or other vendor's documentation showing the VOC content and composition of all solvents used in this operation.

Authority for Requirement: DNR Construction Permit 13-A-458

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 32 Stack Opening, (inches, dia.): 24 x 16 Exhaust Flow Rate (scfm): 4,200 Exhaust Temperature (°F): Ambient (72) Discharge Style: Vertical Unobstructed Authority for Requirement: DNR Construction Permit 13-A-458

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
2NBS3	Coater	Coatings	540 lb/hr

## **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: Volatile Organic Compounds (VOC)

<sup>(1)</sup>Emission Limit(s): Total VOC emissions from emission points 004-005, 004-006, 004-007, 004-012 (excluding emission unit 6ND), 004-029, and 007-005 shall not exceed 2000 tons per rolling twelve month period.

Authority for Requirement: DNR Construction Permits 90-A-152-S4, 90-A-153-S8, 90-A-154-S6, 05-A-448-S9 567 IAC 22.108(14)

<sup>(1)</sup> 3M Knoxville sent a letter dated 04-25-08 requesting that emission points 004-007, and 004-029 be included in this 2000 tons/year VOC limit.

#### **Operational Limits & Requirements**

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

A. The emission units listed below shall collectively be referred to as the "VOC Affected Emission Units" for the purposes of this document.

Emission Unit Name	Emission Unit ID	Emission Point
		ID
		EP 007-005
Line 1N Oven	EU 1NO	EP 004-005
Line 2NA Dryer 1	EU 2NAD1	EP 007-005
Line 2NA Diyer I	EU ZINADI	EP 004-006
Line 2NA Dryer 2	EU 2NAD2	EP 007-005
Lille 2NA Diyel 2	EU 2NAD2	EP 004-006
		EP 007-005
Line 2NB Dryer	EU 2NBD	EP 004-006
		EP 007-005
Line 2NB Oven	EU 2NBO	EP 004-006
		EP 007-005
Line 5N Oven 1	EU 5NO1	EP 004-012
		EP 007-005
Line 5N Oven 2	EU 5NO2	EP 004-012

Emission Unit Name	Emission Unit ID	Emission Point ID
Line 5N Die Cleaning	EU 5NCLEAN	EP 004-012
		EP 007-005
Line 6N Dryer	EU 6ND	EP 004-012
2NAS2	2NA Gravure Station 1	EP 004-007
2NAS3	2NA Gravure Coater 2	EP 004-007
2NBS3	Coater	EP 004-029

- B. The total VOC emissions from the operation of the "VOC Affected Emission Units" shall not exceed 2,000 tons per rolling 12-month period.
  - a. The owner or operator shall maintain records on the identification and VOC content of each VOC-containing material used in the operation of the "VOC Affected Emission Units".
  - b. The owner or operator shall maintain manufacturer and vendor provided information (Safety Data Sheets (SDS), technical data sheets, et.) for all materials used in the operation of the "VOC Affected Emission Units".
  - c. The owner or operator shall maintain daily and monthly records of the amount, in gallons, of each VOC-containing material used in the operation of the "VOC Affected Emission Units".
  - d. The owner or operator shall record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a monthly basis.
  - e. The owner or operator shall calculate and record the amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a rolling 12-month basis.
  - f. The owner or operator shall implement the following procedure if the 12-month rolling total of VOC emitted from the operation of the "VOC Affected Emission Units" exceeds 1,600 tons.
    - vi. The owner of operator shall record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a daily basis.
    - vii. The owner or operator shall calculate and record the total amount of VOC, in tons, emitted from the operation of the "VOC Affected Emission Units" on a rolling 365-day basis.
    - viii. Calculation and recordkeeping of VOC emissions data collected on Saturdays and Sundays shall be conducted on Mondays.
    - ix. Calculation and recordkeeping of VOC emissions shall not be required when emissions do not occur.
    - x. Daily calculations and recordkeeping of VOC shall continue until the rolling 12-month total amount drops below 1,600 tons on the last day of the month. Monthly calculations of VOC emissions from the "VOC Affected Emission Units" shall begin in the following month.

Authority for Requirement: DNR Construction Permits 90-A-152-S4, 90-A-153-S8, 90-A-154-S6, 05-A-448-S9 567 IAC 22.108(14)

## **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart JJJJ, Paper and Other Web Coating and Subpart A, General Provisions, as applicable.

567 IAC 22.108(3)
40 CFR 63 Subpart A
567 IAC 23.1(4)"a"
40 CFR 63 Subpart JJJJ
567 IAC 23.1(4)"cj"
40 CFR 60 Subpart A
567 IAC 23.1(2)

#### **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 🔀

# Emission Point ID Number: 004-031 and 004-034

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit	
004-031	6N Chamber	Cure Chambon	Adhesive,	113 lb/min	07-A-939-S1	
004-034	on Chamber	Cure Chamber Acrylic Acid 113 lb/m		Cure Chamber	115 10/11111	07-A-938-S2

# **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.

Pollutant: Volatile Organic Compounds (VOC) <sup>(1)</sup> Emission Limit(s): 43 tons/yr Authority for Requirement: DNR Construction Permits 07-A-938-S2, 07-A-939-S1 <sup>(1)</sup>This limit was carried over from the original permit for the 6N-1 Coating Line. The total combined emissions from emission points 004-031, 004-034 and 004-067 shall not exceed 43 tons of VOC/yr.

Pollutant: Organic Hazardous Air Pollutants (Organic HAP) Emission Limit(s): Organic HAP emissions shall be limited per 40 CFR §63.3320(b). Compliance shall be demonstrated per 40 CFR §63.3370. Authority for Requirement: DNR Construction Permits 07-A-938-S2, 07-A-939-S1 567 IAC 23.1(4)"cj" 40 CFR 63 Subpart JJJJ

#### **Operating Requirements with Associated Monitoring and Recordkeeping**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The permit holder, owner or operator of the facility shall record the total VOC emissions for the 6N-1 Coating Line on a rolling twelve (12) month basis.

B. Compliance shall be demonstrated for NESHAP subpart JJJJ per 40 CFR §63.3370

- i. Monitoring for NESHAP subpart JJJJ shall be done per 40 CFR §63.3350
- ii. Recordkeeping for NESHAP Subpart JJJJ shall be done per 40 CFR §63.3400 and 40 CFR §63.3410.

Authority for Requirement: DNR Construction Permits 07-A-938-S2, 07-A-939-S1 567 IAC 23.1(4)"cj" 40 CFR 63 Subpart JJJJ

### **NSPS and NESHAP Requirements**

This emission unit is subject to Subpart A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart JJJJ (National Emission Standard for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR §63.3280 through 40 CFR §63.3420) of the National Emission Standard for Hazardous Air Pollutants (NESHAP), as an existing source.

Authority for Requirement: DNR Construction Permits 07-A-938-S2, 07-A-939-S1 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Emission Point	Emission Unit	Stack Height (ft, from the ground)	Stack Opening (inches)	Exhaust Flow Rate (scfm)	Exhaust Temperature (°F)	Discharge Style
004-031	6N	56.5	13.5	4,800	Ambient	Vertical Obstructed
004-034	Chamber	62	8	700		Vertical Unobstructed

Authority for Requirement: DNR Construction Permits 07-A-939-S1, 07-A-938-S2

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission Unit	Emission Unit	Raw	Rated	Construction
	Description	Material/Fuel	Capacity	Permit
Tank 04-01	Storage Tank	Adhesive	240 gal/hr	98-A-660

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

#### **Operating Limits**

Process throughput:

A. The twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-660 shall not exceed 2,100,000 gallons.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The permit holder shall maintain records on the premises to show the twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-660. Records shall be maintained for five years and available for inspection upon request by representatives of the Department.
- B. The permit holder shall maintain records on the premises to show the dimensions and the capacity of the storage vessel administered under DNR permit 98-A-660. Records shall be maintained for the life of the vessel and available for inspection upon request by representatives of the Department.

Authority for Requirement: DNR Construction Permit 98-A-660

#### **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart EEEE 567 IAC 23.1(4)"ce"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 37.0 Stack Diameter (inches): 4.0 Stack Exhaust Flow Rate (scfm): Vent to atmosphere Stack Temperature (°F): Ambient Discharge Style: NA Authority for Requirement: DNR Construction Permit 98-A-660

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🔀

Associated Equipment

Emission Unit	Emission Unit	Raw	Rated	Construction
	Description	Material/Fuel	Capacity	Permit
Tank 04-02	Storage Tank	Adhesive	240 gal/hr	98-A-661

# **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.

None are required at this time.

## **Operational Limits & Requirements**

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

## **Operating Limits**

Process Throughput:

A. The twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-661 shall not exceed 2,100,000 gallons.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The permit holder shall maintain records on the premises to show the twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-661. Records shall be maintained for five years and available for inspection upon request by representatives of the Department.
- B. The permit holder shall maintain records on the premises to show the dimensions and the capacity of the storage vessel administered under DNR permit 98-A-661. Records shall be maintained for the life of the vessel and available for inspection upon request by representatives of the Department.

Authority for Requirement: DNR Construction Permit 98-A-661

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 37.0 Stack Diameter (inches): 4.0 Stack Exhaust Flow Rate (scfm): Vent to atmosphere Stack Temperature (°F): Ambient Discharge Style: NA Authority for Requirement: DNR Construction Permit 98-A-661

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission Unit	Emission Unit	Raw	Rated	Construction
	Description	Material/Fuel	Capacity	Permit
Tank 04-06	Storage Tank	Adhesive	240 gal/hr	98-A-665

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

## **Operating Limits**

Process throughput:

A. The twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-665 shall not exceed 1,580,000 gallons.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The permit holder shall maintain records on the premises to show the twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-665. Records shall be maintained for five years and available for inspection upon request by representatives of the Department.
- B. The permit holder shall maintain records on the premises to show the dimensions and the capacity of the storage vessel administered under DNR permit 98-A-665. Records shall be maintained for the life of the vessel and available for inspection upon request by representatives of the Department.

Authority for Requirement: DNR Construction Permit 98-A-665

### **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Authority for Requirement: 567 IAC 22.108(3) 40 CFR Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart EEEE 567 IAC 23.1(4)"ce"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 37.0 Stack Diameter (inches): 4.0 Stack Exhaust Flow Rate (scfm): Vent to atmosphere Stack Temperature (°F): Ambient Discharge Style: NA Authority for Requirement: DNR Construction Permit 98-A-665

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission Unit	Emission Unit	Raw	Rated	Construction
	Description	Material/Fuel	Capacity	Permit
Tank 04-08	Storage Tank	Adhesive	240 gal/hr	98-A-667

# **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.

None are required at this time.

## **Operational Limits & Requirements**

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

## **Operating Limits**

Process throughput:

A. The twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-667 shall not exceed 1,580,000 gallons.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The permit holder shall maintain records on the premises to show the twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-667. Records shall be maintained for five years and available for inspection upon request by representatives of the Department.
- B. The permit holder shall maintain records on the premises to show the dimensions and the capacity of the storage vessel administered under DNR permit 98-A-667. Records shall be maintained for the life of the vessel and available for inspection upon request by representatives of the Department.

Authority for Requirement: DNR Construction Permit 98-A-667

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 37.0 Stack Diameter (inches): 4.0 Stack Exhaust Flow Rate (scfm): Vent to atmosphere Stack Temperature (°F): Ambient Discharge Style: NA Authority for Requirement: DNR Construction Permit 98-A-667

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission Unit	Emission Unit	Raw	Rated	Construction
	Description	Material/Fuel	Capacity	Permit
Tank 04-07	Storage Tank	Adhesive	240 gal/hr	98-A-666

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

## **Operating Limits**

Process throughput:

A. The twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-666 shall not exceed 1,580,000 gallons.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The permit holder shall maintain records on the premises to show the twelve month total, rolled monthly, amount of material stored in the storage vessel administered under DNR permit 98-A-666. Records shall be maintained for five years and available for inspection upon request by representatives of the Department.
- B. The permit holder shall maintain records on the premises to show the dimensions and the capacity of the storage vessel administered under DNR permit 98-A-666. Records shall be maintained for the life of the vessel and available for inspection upon request by representatives of the Department.

Authority for Requirement: DNR Construction Permit 98-A-666

#### **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 60 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart EEEE 567 IAC 23.1(4)"ce"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 37.0 Stack Diameter (inches): 4.0 Stack Exhaust Flow Rate (scfm): Vent to atmosphere Stack Temperature (°F): Ambient Discharge style: NA Authority for Requirement: DNR Construction Permit 98-A-666

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🔀

Associated Equipment

Emission	Emission Unit Description	Raw	Rated	Construction
Unit		Material/Fuel	Capacity	Permit
8NC	8N Cure Chamber	Adhesive	170 lb/min	92-A-653-S4

# **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: Volatile Organic Compounds (VOC) Emission Limit(s): 30 tons/yr <sup>(1)</sup>, 0.2 lb/lb of solids applied

Authority for Requirement: DNR Construction Permit 92-A-653-S4 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

<sup>(1)</sup> This is the total for emission units permitted under permit numbers 92-A-653-S4, 92-A-652-S4, 95-A-290-S2, 01-A-840, and 01-A-841.

#### **Operational Limits & Requirements**

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

#### **Operating Limits**

There are none at this time.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

These records shall show the following:

- A. Per 40 CFR §60.443, calculations to determine compliance with the VOC standard of 0.2 lb of VOC/lb of coating solids applied.
- B. Records as required per 40 CFR §60.445.

Authority for Requirement: DNR Construction Permit 92-A-653-S4 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

### **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 60 Subpart A, General Provisions and 40 CFR 63 Subpart JJJJ, Paper and Other Web Coating, as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

This emission unit is subject to the requirements of 40 CFR 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement:	DNR Construction Permit 92-A-653-S4 40 CFR 60 Subpart A
	567 IAC 23.1(2) 40 CFR 60 Subpart RR
	567 IAC 23.1(2)"qq"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 62 Stack Diameter (inches): 16 Stack Exhaust Flow Rate (scfm): 4,000 Stack Temperature (°F): 80 Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 92-A-653-S4

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> *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 🔀

Associated Equipment

	nission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
8	NCT	8N Corona Treater	Electrical Energy	10 kW	94-A-545-S5

# **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: Ozone Emission Limit(s): 0.73 lb/hr

Authority for Requirement: DNR Construction Permit 94-A-545-S5

## **Operational Limits & Requirements**

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

No operating limits are required for this emission unit at this time.

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 64.9 Stack Diameter (inches): 8 Stack Exhaust Flow Rate (scfm): 5,300 Stack Temperature (°F): 72 Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 94-A-545-S5

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

Associated Equipment

Emission	Emission Unit Description	Raw	Rated	Construction
Unit		Material/Fuel	Capacity	Permit
6NS1	6N-1 Plastic Adhesive Coating Chamber	Adhesive	113 lb/min	95-A-290-S2

# **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: Volatile Organic Compounds (VOC) Emission Limit(s): 43 tons/yr<sup>(1)</sup> Authority for Requirement: DNR Construction Permit 95-A-290-S2 <sup>(1)</sup> The total combined emissions from emission points 004-031, 004-034 and 004-067 shall not exceed 43 tons of VOC/yr.

Pollutant: Organic Hazardous Air Pollutants (Organic HAP) Emission Limit(s): Organic HAP emissions shall be limited per 40 CFR §63.3320(b). Compliance shall be demonstrated per 40 CFR §63.3370.

Authority for Requirement:	DNR Construction Permit 95-A-290-S2
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

### **Operational Limits & Requirements**

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

# **Operating Limits**

A. Compliance shall be demonstrated for NESHAP Subpart JJJJ per 40 CFR §63.3370.

### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The facility (plant number 63-01-001) shall record the total VOC emissions on a rolling twelve (12) month basis.
- B. Monitoring for NESHAP Subpart JJJJ shall be done per 40 CFR §63.3400.
- C. Recordkeeping for NESHAP Subpart JJJJ shall be done per 40 CFR §63.3410.
- D. The permit holder, owner or operator of the facility shall record the total VOC emissions for the 6N-1 Coating Line on a rolling twelve (12) month basis.

Authority for Requirement:	DNR Construction Permit 95-A-290-S2
	567 IAC 22.108(3)
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

#### **NSPS and NESHAP Requirements:**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 – §63.15) and JJJJ (National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR §63.3280 – §63.3420) of the National Emission Standards for Hazardous Air Pollutants (NESHAP), as applicable.

Authority for Requirement:	DNR Construction Permit 95-A-290-S2
	40 CFR 63 Subpart A 567 IAC 23.1(4)"a"
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 63 Stack Diameter (inches): 24 Stack Exhaust Flow Rate (scfm): 12,000 Stack Temperature (°F): 85 Discharge Style: Vertical Unobstructed Authority for Requirement: DNR Construction Permit 95-A-290-S2

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
8NS1	8N Coating Station	Adhesive	170 lb/min	92-A-652-S4

# **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: Volatile Organic Compounds (VOC) Emission Limit(s): 30 tons/yr<sup>(1)</sup>, 0.2 lb/lb of solids applied

Authority for Requirement:	DNR Construction Permit 92-A-652-S4
	40 CFR 60 Subpart RR
	567 IAC 23.1(2)"qq"

<sup>(1)</sup> This is the total for emission units permitted under permit numbers 92-A-653-S4, 92-A-652-S4, 95-A-290-S2, 01-A-840 and 01-A-841.

#### **Operational Limits & Requirements**

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

### **Operating Limits**

There are none required at this time.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

These records shall show the following:

- A. Per 40 CFR §60.443, calculations to determine compliance with the VOC standard of 0.2 lb of VOC/lb of coating solids applied.
- B. Records as required per 40 CFR §60.445.

Authority for Requirement: DNR Construction Permit 92-A-652-S4 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

#### **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

This emission unit is subject to the requirements of 40 CFR Part 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement:	DNR Construction Permit 92-A-652-S4
	40 CFR 60 Subpart A
	567 IAC 23.1(2)
	40 CFR 60 subpart RR
	567 IAC 23.1(2)"qq"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 64 Stack Diameter (inches): 26.1 Stack Exhaust Flow Rate (scfm): 8,300 Stack Temperature (°F): 80 Discharge Style: Vertical unobstructed

Authority for Requirement: DNR Construction Permit 92-A-652-S4

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
Tank 04-10	Storage Tank	Coating	10,600 gallons	93-A-152

#### Associated Equipment

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

#### **Operating Limits**

There are none required at this time.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The permit holder shall maintain records on the premises to show the dimensions and the capacity of the storage vessel administered under DNR permit 93-A-152.

Authority for Requirement: DNR Construction Permit 93-A-152

#### **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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
Tank 04-09	Storage Tank	Coating	10,600 gallons	93-A-151-S1

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

#### **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP), as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart EEEE
	567 IAC 23.1(4)"ce"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 43 Stack Diameter (inches): 3 Stack Exhaust Flow Rate (scfm): Vent to atmosphere (Working/Breathing Loss) Stack Temperature (°F): 70 Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 93-A-151-S1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall

submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

# Emission Point ID Numbers: 004-047, 004-079

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
6N Enclosure	Web Seal Exhaust and Coater	Adhesive	113 lb/min (Coater)	93-A-341

# **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.

Pollutant: Volatile Organic Compounds (VOC) Emission Limit: 43 tons/yr for the 6N Coating Line

# Authority for Requirement: DNR Construction Permits 07-A-938-S2, 07-A-939-S1, 93-A-341, 95-A-290-S2

#### **Operation Limits and Requirements**

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

### **NSPS and NESHAP Requirements**

These emission units are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63, Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

#### **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 🖂

#### Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
8NC	8N Coating (vacuum plate Exhaust)	Adhesive	170 lb/min	01-A-840

# **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: Volatile Organic Compounds (VOC) Emission Limit(s): 30 tons/yr<sup>(1)</sup>, 0.2 lb/lb of solids applied Authority for Requirement: DNR Construction Permit 01-A-840 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

<sup>(1)</sup> This is the total for emission units permitted under permit numbers 92-A-653-S4, 92-A-652-S4, 95-A-290-S2, 01-A-840, and 01-A-841.

#### **Operational Limits & Requirements**

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

#### **Operating Limits**

None are required at this time.

#### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. Per 40 CFR §60.443, calculations to determine compliance with the VOC standard of 0.2 lb of VOC/lb of coating solids applied.

B. Records as required per 40 CFR §60.445.

Authority for Requirement: DNR Construction Permit 01-A-840 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

#### **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

This emission unit is subject to the requirements of 40 CFR 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement:	DNR Construction Permit 01-A-840
	40 CFR 60 Subpart A
	567 IAC 23.1(2)
	40 CFR 60 Subpart RR
	567 IAC 23.1(2)"qq"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 60.5 Stack Diameter (inches): 6.7 Stack Exhaust Flow Rate (scfm): 25 Stack Temperature (°F): 80 Discharge Style: Vertical unobstructed

Authority for Requirement: DNR Construction Permit 01-A-840

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

# Emission Point ID Number: 004-081 and 004-088 (Dual stack)

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
8N Enclosure	8N Web Enclosure Exhaust (coating/delaminator)	Adhesive	170 lb/min	01-A-841

# **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: Volatile Organic Compounds (VOC) Emission Limit(s): 30 tons/yr<sup>(1, 2)</sup>, 0.2 lb/lb solids applied <sup>(2)</sup>

Authority for Requirement:	DNR Construction Permit 01-A-841
	40 CFR 60 Subpart RR
	567 IAC 23.1(2)"qq"

<sup>(1)</sup> This is the total for emission units permitted under permit numbers 92-A-653-S4, 92-A-652-S4, 95-A-290-S2, 01-A-840 and 01-A-841. This limit also includes emissions from EP 004-088.
 <sup>(2)</sup> EP 004-081, covered under DNR Construction Permit # 01-A-841, was supplemented with stack, 004-

088. The original stack and then the installation of 004-088 were completed under a construction permit exemption letter from Clark Ott, March 12, 1996. Roughly 95% of the emissions exhaust through 004-088 and 5% through 004-081.

### **Operational Limits & Requirements**

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

### **Operating Limits**

No operating limits are required for these emission units at this time

### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

These records shall show the following:

- A. Per 40 CFR §60.443, calculations to determine compliance with the VOC standard of 0.2 lb of VOC/lb of coating solids applied.
- B. Records as required per 40 CFR §60.445.

Authority for Requirement: DNR Construction Permit 01-A-841 40 CFR 60 subpart RR

#### 567 IAC 23.1(2)"qq"

#### **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

This emission unit is subject to the requirements of 40 CFR 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement:	DNR Construction Permit 01-A-841
	40 CFR 60 Subpart A
	567 IAC 23.1(2)
	40 CFR 60 subpart RR
	567 IAC 23.1(2)"qq"

#### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 65.3 Stack Diameter (inches): 16 Stack Exhaust Flow Rate (scfm): 3,000 Stack Temperature (°F): 72 Discharge Style: Vertical Unobstructed Authority for Requirement: DNR Construction Permit 01-A-841

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
Die Clean E and W	Die Cleaning Tank Cart Cleaning Exhaust	MEK and Heptane	100 gallons	95-A-457-S1

# **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: Volatile Organic Compounds (VOC) Emission Limit(s): 3.5 tons/yr

Authority for Requirement: DNR Construction Permit 95-A-457-S1

#### **Operational Limits & Requirements**

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

#### **Operating Limits**

- A. Total combined solvent consumption for the tank and pump cart cleaning station is limited to 1,000 gallons per 12-month period.
- B. The density of the solvent used shall not exceed 7.0 pounds per gallon.

### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The consumption of solvent, in gallons, on a rolling 12-month period basis.

B. The density of each solvent used in pounds per gallon.

C. A copy of the Safety Data Sheet (SDS) for all solvents used at these emission units.

Authority for Requirement: DNR Construction Permit 95-A-457-S1

### **Emission Point Characteristics**

This emission point shall conform to the specifications listed below

Stack Height (feet): 30
Stack Diameter (inches): 22
Stack Exhaust Flow Rate (scfm): 5,000
Stack Temperature (°F): Ambient
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 95-A-457-S1
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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

#### Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
04-1NAM-A-05	Storage Tank	Adhesive	900 gallons	00-A-824

# **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.

None are required at this time.

#### **Operational Limits & Requirements**

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

### **Operating Limits**

None are required at this time.

### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

The records shall show the following:

A. A copy of the Safety Data Sheet (SDS) of all materials stored in the tank.

Authority for Requirement: DNR Construction Permit 00-A-824

### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (feet): 15.5 Stack Diameter (inches): 2 Stack Exhaust Flow Rate (scfm): Displacement Stack Temperature (°F): 70 Discharge Style: Vertical Obstructed

Authority for Requirement: DNR Construction Permit 00-A-824

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **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 🖂

#### Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
5NCT2	5N Corona Treater #2	Electrical Energy	10 kW-hr	08-A-163-S1

# **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.

None at this time

#### **Operational Limits & Requirements**

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

None at this time.

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 83 Stack Opening, (inches, dia.): 12 Exhaust Flow Rate (scfm): 620 Exhaust Temperature (°F): 72 Discharge Style: Unobstructed Vertical

Authority for Requirement: DNR Construction Permit 08-A-163-S1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

Associated Equipment

Emiss		Emission Unit	Control	Raw	Rated	Construction
Uni		Description	Equipment	Material/Fuel	Capacity	Permit
005-0	08	Resin Dumper	Bag Filter (CE RM4DC)	Resin	8,000 lb/hr	76-A-271

# **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: Opacity Emission Limit(s): 40% Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a" DNR Construction Permit 76-A-271

### **Operational Limits and Requirements**

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

None at this time.

#### **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 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

#### Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material/Fuel	Rated Capacity	Construction Permit
Mch 01	Rubber Milling		Rubber, Resin	400 lb/hr	
Mch 02	Rubber Mixing	Bag Filter (CE Mill DC)	Rubber, Powder	4,740 lb/hr	
COMPD Dumpster	Trash Dumpster		General Trash	5,140 lb/hr	76-A-269
Extruder	Extruding		Rubber, Powder, Resin	4,740 lb/hr	

# **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: Opacity Emission Limit(s): 40% Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a" DNR Construction Permit 76-A-269

### **Operational Limits and Requirements**

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

### **NSPS and NESHAP Requirements**

The Extruder unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

#### **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 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Emission	Emission Unit	Control	Raw	Rated	Construction
Unit	Description	Equipment	Material/Fuel	Capacity	Permit
Mch 09	Powder Mixer	Bag Filter (CE SBS PM DC)	Powder	1,575 lb/hr	93-A-364

# **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: Opacity Emission Limit(s): 40% Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/dscf, 0.13 lb/hr Authority for Requirement: DNR Construction Permit 93-A-364

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height, (ft, from the ground): 44 Authority for Requirement: DNR Construction Permit 93-A-364

#### **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 🗌
<b>Compliance Assurance Monitoring (CAM) Plan Required?</b>	Yes 🖂 No 🗌

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

### CAM Plan for EP-005-028 SBS Dust Collector

I. Background

Α.	Emissions Unit	SBS Dust collector
	Identification:	EU 005-028
	Facility:	3M Knoxville
		3406 East Pleasant
		Knoxville, IA 50138

 B. Applicable Regulation, Emission Limit, and Monitoring Requirements Regulation No.: Particulate emission limit: PM/PM<sub>10</sub>: 0.1 gr/dscf Opacity emission limit: 40%

Current Monitoring requirements:

- 1. Daily Differential Pressure alarm status documentation.
- 2. Every two week opacity (no visible emissions) readings (PMR 62386)
- 3. Every 4 week Static Pressure check and opacity reading (PMS 20466)
- 4. Annual Magnehelic calibrations (PMM 11964)
- 5. Alarm for upset conditions when the pressure sensor is <1" of water.
- C. Control Technology Bag Filter - Dust Collector
- II. Monitoring Approach

The key elements of the monitoring approach are presented in Table A. The selected performance indicators are baghouse module differential pressure and visible emissions.

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Differential Pressure	Differential Pressure	Visible Emissions
	Alarm		
Measurement Approach	A control panel alarm is triggered if the pressure <1" in the water column.	Differential pressure measured across the baghouse by a magnetic pressure gauge.	Visible emissions from baghouse exhaust while Banbury Dust collector is cleaning.
II. Indicator Range	A control panel	A control panel alarm	Less than 1" in W.C
	alarm is triggered if	is triggered if the	will trigger an
	the pressure <1" in	pressure is <1" in the	excursion. Excursions

Table A – Monitoring Approach

the water column.	water column.	trigger an inspection,
Excursions trigger	Excursions trigger an	corrective action, and a
an inspection,	inspection, corrective	recordkeeping
corrective action	action and a	requirement. The
and a recordkeeping	recordkeeping	inspection that is
requirement. The	requirement. The	triggered is an
inspection that is	inspection that is	inspection of the bags
triggered is a NVE	triggered is a NVE	and a replacement of
emissions	emissions observation.	all of the bags if an
observation.		issue is found.

III. Performance			
Criteria			
A. Data Representativeness	The differential pressure is measured across the baghouse.	The differential pressure is measured across the baghouse.	Visible emissions observations are made at the emission point and on the external baghouse unit, system ductwork and associated components.
B. Verification of Operational Status	The pressure gauge will be calibrated, operated, and maintained according to the manufacturer's specifications.	The pressure gauge will be calibrated, operated, and maintained according to the manufacturer's specifications.	Not applicable.
C. QA/QC Practices and Criteria	Pressure gauges will be calibrated, operated, and maintained according to the manufacturer's specifications.	Pressure gauges will be calibrated, operated, and maintained according to the manufacturer's specifications.	The observer will be trained by 3M to detect visible emissions.
D. Monitoring Frequency	The 24 hour alarm status is recorded (Alarm/No Alarm is continually recorded on the Active Factory system	The differential pressure will be inspected via a PMS every 4 weeks	No visible emissions (NVE) observations are made at the emission point every two weeks via a PMR.
E. Data Collection Procedures	Each day's alarm status is recorded.	Results of baghouse differential pressure checks will be recorded on PMS20466	Results of "no visible emissions" observations are recorded PMR 62386 and noted as a 1 if no issues are found

Associated Equipment

Emission	Emission Unit	Control	Raw	Rated	Construction
Unit	Description	Equipment	Material/Fuel	Capacity	Permit
Mch 02	Rubber Mixing	Bag Filter (CE BAN DC)	Rubber/Powders	4,740 lb/hr	76-A-270

# **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: Opacity Emission Limit(s): 40% Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf Authority for Requirement: 567 IAC 23.2 "a" DNR Construction Permit 76-A-270

### **Operational Limits & Requirements**

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

None at this time.

#### **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 🗌

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

# CAM Plan for EP-005-034 Banbury Dust Collector

### I. <u>Background</u>

- A. <u>Emissions Unit</u> Description: Banbury Dust collector Identification: EU 005-034 Facility: 3M Knoxville 3406 East Pleasant Knoxville, IA 50138
- B. Applicable Regulation, Emission Limit, and Monitoring Requirements Regulation No.: Particulate emission limit: PM/PM<sub>10</sub>: 0.1 gr/dscf

Opacity emission limit:

40%

Current Monitoring requirements:

- 1. Every two week opacity (no visible emissions) readings (PMR 62386)
- 2. Every 4 week Static Pressure check and opacity reading (PMS 20466)
- 3. Annual Magnehelic calibrations (PMM 11964)
- 4. Alarm for upset conditions when the pressure sensor is <1" of water.
- C. Control Technology Bag Filter - Dust Collector

### II. Monitoring Approach

The key elements of the monitoring approach are presented in Table A. The selected performance indicators are baghouse module differential pressure and visible emissions.

<u> </u>			L
	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Differential Pressure	Differential Pressure	Visible Emissions
	Alarm		
Measurement	A control panel	Differential pressure	Visible emissions from
Approach	alarm is triggered if	measured across the	baghouse exhaust
	the pressure <1" in	baghouse by a	while Banbury Dust
	the water column.	magnetic pressure	collector is cleaning.
		gauge.	
II. Indicator Range	A control panel	A control panel alarm	Less than 1" in W.C
	alarm is triggered if	is triggered if the	will trigger an
	the pressure <1" in	pressure is <1" in the	excursion. Excursions

the water column.	water column.	trigger an inspection,
Excursions trigger	Excursions trigger an	corrective action, and a
an inspection,	inspection, corrective	recordkeeping
corrective action	action and a	requirement. The
and a recordkeeping	recordkeeping	inspection that is
requirement. The	requirement. The	triggered is an
inspection that is	inspection that is	inspection of the bags
triggered is a NVE	triggered is a NVE	and a replacement of
emissions	emissions observation.	all of the bags if an
observation.		issue is found.

III. Performance Criteria			
A. Data Representativeness	The differential pressure is measured across the baghouse.	The differential pressure is measured across the baghouse.	Visible emissions observations are made at the emission point and on the external baghouse unit, system ductwork and associated components.
B. Verification of Operational Status	The pressure gauge will be calibrated, operated, and maintained according to the manufacturer's specifications.	The pressure gauge will be calibrated, operated, and maintained according to the manufacturer's specifications.	Not applicable.
C. QA/QC Practices and Criteria	Pressure gauges will be calibrated, operated, and maintained according to the manufacturer's specifications.	Pressure gauges will be calibrated, operated, and maintained according to the manufacturer's specifications.	The observer will be trained by 3M to detect visible emissions.
D. Monitoring Frequency	The 24 hour alarm status is recorded (Alarm/No Alarm is continually recorded on the Active Factory system	The differential pressure will be inspected via a PMS every 4 weeks	No visible emissions (NVE) observations are made at the emission point every two weeks via a PMR.
E. Data Collection Procedures	Each day's alarm status is recorded.	Results of baghouse differential pressure checks will be recorded on PMS20466	Results of "no visible emissions" observations are recorded PMR 62386 and noted as a 1 if no issues are found

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material/Fuel	Capacity	Permit
Churn 1	Mix Tank	Coating	535 gallons	

# **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: Single Hazardous Air Pollutant (Single HAP) Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 02-A-384-S1

Pollutant: Total Hazardous Air Pollutants (Total HAP) Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 02-A-384-S1

# **Operational Limits & Requirements**<sup>(1)</sup>

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

- A. The amount of any single HAP emitted from Churn 1 shall be limited to a maximum of 9.4 tons per 12-month rolling period.
- B. The amount of all HAPs emitted from Churn 1 shall be limited to a maximum of 24.4 tons per 12-month rolling period.

HAP emissions shall by monitored and recorded and required in the Reporting and Recordkeeping section.

### **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

The records shall show the following:

- A. A Safety and Data Sheet (SDS) of each material utilized shall be kept on-site and available for inspection by the DNR to verify VOC and HAP content.
- B. Record the monthly amount of material utilized (in applicable units) by Churn 1.
- C. After the first twelve (12) months of operation, calculate and update the HAP emission totals from Churn 1on a rolling 12-month basis for each month of operation.
- D. HAP emissions shall be determined using the emission factor provided in the table below:

Emission Unit	Permit Number	Tracking Units	Emission Factors
Churn 1	02-A-384-S1	Gallons	0.02 lb HAP/gal

**Table 1. HAP Emission Factors** 

Authority for Requirement: DNR Construction Permit 02-A-384-S1

<sup>(1)</sup> These requirements are from a construction project which included three construction permits (02-A-383-S1, 02-A-384-S1, and 02-A-385-S1). Two of these permits (02-A-383-S1 and 02-A-385-S1) have been rescinded relating to Mogul 1 (EP 005-009) and Churn 2 (005-052) because these two emission units were routed to the thermal oxidizer (007-005) in 2005.

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 24 Stack Opening, (inches, dia.): 2 Exhaust Flow Rate (scfm): 0.5 Exhaust Temperature (°F): 68 Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 02-A-384-S1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> *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 🔀

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material/Fuel	Capacity	Permit
Boiler 1	Boiler 1	Natural Gas	72 MMBtu/hr	

# **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: Opacity Emission Limit(s): 40% <sup>(1)</sup> Authority for Requirement: D

Authority for Requirement: DNR Construction Permit 76-A-181-S2 567 IAC 23.3(2)"d"

<sup>(1)</sup>An exceedance of the indicator opacity of "No Visible Emissions" will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.38 lb/MMBtu Authority for Requirement: DNR Construction Permit 76-A-181-S2 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv Authority for Requirement: DNR Construction Permit 76-A-181-S2 567 IAC 23.3(3)"e"

#### **Operational Requirements with Associated Monitoring and Recordkeeping**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

### **NSPS and NESHAP Requirements**

This equipment is subject to regulation by the following federal regulation: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63 Subpart DDDDD], as applicable.

Authority for Requirement: 40 CFR Part 63 Subpart DDDDD

# **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 82 Stack Opening, (inches, dia.): 36 Exhaust Flow Rate (scfm): 14,600 Exhaust Temperature (°F): 500 Discharge Style: Vertical Authority for Requirement: DNR Construction Permit 76-A-181-S2

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

### **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 🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material/Fuel	Capacity	Permit
Gen 007	Generator	Diesel	896 bhp	

# **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: Opacity Emission Limit(s): 40% <sup>(1)</sup> Authority for Requirement:

DNR Construction Permit 10-A-524 567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of "25%" 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).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.20 g/kW-hr \* Authority for Requirement:

40 CFR 60 Subpart IIII 567 IAC 23.1(2)"yyy"

\*Compliance with the PM limit is demonstrated by purchasing an engine certified by the manufacturer to the reference limit.

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.5 lb/MMBtu\* Authority for Requirement: DNR Construction Permit 10-A-524 567 IAC 23.3(3)"b"

\*Compliance with the SO<sub>2</sub> limit is demonstrated by keeping records of ultra low sulfur diesel.

Pollutant: THC + Nitrogen Oxides (NO<sub>x</sub>)\* Emission Limit(s): 6.4 g/kW-hr Authority for Requirement: 40 CFR 60 Subpart IIII

567 IAC 23.1(2)"yyy"

\*Compliance with the NO<sub>x</sub> limit is demonstrated by purchasing an engine certified by the manufacturer to the reference limit.

Pollutant: Carbon Monoxide (CO) Emission Limit(s): 3.5 g/kW-hr \* Authority for Requirement:

40 CFR 60 Subpart IIII 567 IAC 23.1(2)"yyy"

\*Compliance with the CO limit is demonstrated by purchasing an engine certified by the manufacturer to the reference limit.

# **Operational Limits & Requirements**

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

# **Operating Limits**

- A. This generator, Gen 007, shall operate only in emergency situations or for routine maintenance and testing.
- B. This generator, Gen 007, shall not operate more than 500 hours per rolling twelve-month period.
- C. Beginning October 1, 2010, diesel fuel fired in this generator shall be limited to a maximum sulfur content of 15 ppm and a minimum cetane index of 40 or a maximum aromatic content of 30 percent by volume per 40 CFR§80.510(b).

# **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. Record each month the total hours of operation for this generator, Gen 007, and the reason the generator was operated. Calculate and record rolling twelve-month totals.
- B. Maintain records of the sulfur content of the fuel oil utilized in this generator, Gen 007.

Authority for Requirement: DNR Construction Permit 10-A-524 40 CFR 60 Subpart IIII 567 IAC 23.1(2)"yyy"

# **NSPS and NESHAP Requirements**

This emission unit is subject to the New Source Performance Standards (NSPS) Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR §60.4200 through 40 CFR §60.4219) and to NSPS Subpart A - General Provisions (40 CFR §60.1 through 40 CFR §60.19), as applicable and is also subject to the requirements of 567 IAC 23.1(2)"yyy".

The emission unit is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (Subpart ZZZZ). Stationary RICE units subject to regulations under 40 CFR Part 60; however, must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart IIII, as applicable. No further requirements apply for such engines under Subpart ZZZZ.

DNR Construction Permit 10-A-524
40 CFR 60 Subpart A
567 IAC 23.1(2)
40 CFR 60 Subpart IIII
567 IAC 23.1(2)"yyy"
40 CFR 63 Subpart ZZZZ
567 IAC 23.1(4)"cz"

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 9.4
Stack Opening, (inches, dia.): 10
Exhaust Flow Rate (scfm): 2,781
Exhaust Temperature (°F): 425
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 10-A-524

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

### **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🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated	Construction
Unit	Description	Material/Fuel	Capacity	Permit
Boiler 2A	Boiler 2	Natural Gas	40 MMBtu/hr	

# **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: Opacity Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 19-A-628 567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of "no visible emissions" will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.5 lb/hr; 0.6 lb/MMBtu Authority for Requirement: DNR Construction Permit 19-A-628 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 0.1 lb/hr; 500 ppm by volume Authority for Requirement: DNR Construction Permit 19-A-628 567 IAC 23.3(3)"e"

# **Operational Requirements with Associated Monitoring and Recordkeeping**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. Boiler 2 (EU-Boiler 2A) is limited to firing on natural gas. Prior to burning any other fuels, the permittee shall submit an application to the Iowa DNR - Air Quality Bureau to modify this permit.
- B. The owner or operator shall comply with 40 CFR §60.48c(g) by choosing one of the following options:
  - (1) record and maintain records of the amount of each fuel combusted during each operating day,
  - (2) record and maintain records of the amount of each fuel combusted during each calendar month, or

(3) record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

Authority for Requirement: DNR Construction Permit 19-A-628

## **NSPS and NESHAP Applicability**

This emission unit is subject to 40 CFR 60 Subpart A, General Provisions and Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as applicable.

Authority for Requirement:	DNR Construction Permit 19-A-628
	40 CFR 60 Subpart A
	567 IAC 23.1(2)
	40 CFR 60 Subpart Dc
	567 IAC 23.1(2)"III"

This equipment is subject to regulation by the following federal regulation: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63 Subpart DDDDD], as applicable.

Authority for Requirement: 40 CFR Part 63 Subpart DDDDD

## **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 82 Stack Outlet Dimensions, (inches): 36 Exhaust Flow Rate (scfm): 9,600 Exhaust Temperature (°F): 500 Discharge Style: Horizontal

Authority for Requirement: DNR Construction Permit 19-A-628

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

# **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?



Associated Equipment

<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Raw Material/Fuel</b>	Rated Capacity
Pump House Boiler	Pump House Boiler	Natural Gas	2.2 MMBtu/hr

# **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: Opacity Emission Limit(s): 40% Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.6 lb/MMBtu Authority for Requirement: 567 IAC 23.3(2)"b"(2)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv Authority for Requirement: 567 IAC 23.3(3)"e"

### **Operational Limits & Requirements**

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

### **NSPS and NESHAP Requirements**

This equipment is subject to regulation by the following federal regulation: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63 Subpart DDDDD], as applicable.

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 63 Subpart DDDDD

#### **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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
GEN 008	Fire Water Pump	Diesel	340 bhp

# **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: Opacity Emission Limit(s): 40% Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.5 lb/MMBtu Authority for Requirement: 567 IAC 23.3(3)"b"(2)

# **Operational Limits & Requirements**

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

# **NSPS and NESHAP Requirements**

The emergency engine is subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), as applicable. According to 40 CFR 63.6590(a)(1)(ii) this compression ignition emergency engine, located at a major source, is an existing stationary RICE as it was constructed prior to June 12, 2006.

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ 567 IAC 23.1(4)"cz"

<u>Monitoring Requirements</u> 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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
Tank 10-6	Storage Tank	Solvent	30,000 gallons

# **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.

None are required at this time.

## **Operational Limits & Requirements**

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

## **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP), as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart EEEE
	567 IAC 23.1(4)"ce"

### **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 🖂

Associated Equipment

Emis	sion Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
Tar	nk 10-8	Storage Tank	Toluene	30,000 gallons

# **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.

None are required at this time.

# **Operational Limits & Requirements**

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

## **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP), as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart EEEE
	567 IAC 23.1(4)"ce"

### **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 🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated Capacity	Construction
Unit	Description	Material/Fuel		Permit
Tank 13	Recovered Solvent Tank	Solvent	19,750 gallons	94-A-451-S2

# **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.

None are required at this time.

### **Operational Limits & Requirements**

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

There are no operating limits for this source at this time.

Authority for Requirement: DNR Construction Permit 94-A-451-S2

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 4
Exhaust Flow Rate (scfm): Displacement
Exhaust Temperature (°F): 51
Discharge Style: Downward
Authority for Requirement: DNR Construction Permit 94-A-451-S2

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

Associated Equipment

Emission	Emission Unit	Control	Raw	Rated	Construction
Unit	Description	Equipment	Material/Fuel	Capacity	Permit
Tank 18	Glass Bubbles Storage Tank	Donaldson Torit Dust Collector (CE TNK18DC)	Inorganic Bubbles	114 lb/hr	99-A-224

# **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: Opacity Emission Limit(s): 40% <sup>(1)</sup> Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 99-A-224

<sup>(1)</sup> If an opacity measurement exceeds the indicator opacity (25%) this facility should promptly investigate this source and make corrections. However, if after corrections are made the opacity continues to exceed the indicator opacity the Department may require a demonstration of compliance with mass emission limits, i.e. stack tests.

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a" DNR Construction Permit 99-A-224

# **Operational Limits & Requirements**

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

# **Operating Limits**

A. Maintain Donaldson Torit Dust Collector according to manufacturer's specifications and maintenance schedule.

# **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. Record on a monthly basis, all maintenance of Donaldson Torit Dust Collector.

Authority for Requirement: DNR Construction Permit 99-A-224

# **Emission Point Characteristics**

The source shall be connected to the stack designated below.

Stack Height (feet): 50 Stack Diameter (inches): 10 Stack Exhaust Flow Rate (scfm): 100 Stack Temperature (°F): Ambient Authority for Requirement: DNR Construction Permit 99-A-224

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

## **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 🖂

Associated Equipment

Emission	Emission Unit	Raw	Rated Capacity	Construction
Unit	Description	Material/Fuel		Permit
7NS1	7N Maker – Coating Exhaust Station	Coating	672,000 cf/hr; 10 gal coating/min	94-A-167-S1

# **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: Opacity Emission Limit(s): 5% <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 94-A-167-S1 567 IAC 23.3(2)"d"

<sup>(1)</sup>Visible emissions will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/dscf Authority for Requirement: DNR Construction Permit 94-A-167-S1 567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC) Emission Limit(s): 1.75 lb/hr Authority for Requirement: DNR Construction Permit 94-A-167-S1

# **Operational Limits & Requirements**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall follow the applicable requirements of the NSPS, Subpart RR, 40 CFR §60.440 - §60.447.
- B. The owner or operator shall follow the applicable requirements of the NESHAP, Subpart JJJJ, 40 CFR §63.3280 – §63.3410.

Authority for Requirement: DNR Construction Permit 94-A-167-S1 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj" 40 CFR 60 Subpart RR

# 567 IAC 23.1(2)"qq"

## **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

This emission unit is subject to the requirements of 40 CFR 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement:	DNR Construction Permit 94-A-167-S1
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"
	40 CFR 60 Subpart A
	567 IAC 23.1(2)
	40 CFR 60 Subpart RR
	567 IAC 23.1(2)"qq"

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 54 Stack Outlet Dimensions, (inches): 12 Exhaust Flow Rate (scfm): 500 Exhaust Temperature (°F): 72 Discharge Style: Vertical Unobstructed Authority for Requirement: DNR Construction Permit 94-A-167-S1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

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

# **Opacity Monitoring:**

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the

observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (>5 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

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 Numbers: 019-003, 019-004, 019-005

## Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
7NC	Cure Chamber/Dryer	Adhesive/Coating	10 gal/min

# **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.

None required at this time.

## **Operational Limits & Requirements**

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

## **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

This emission unit is subject to the requirements of 40 CFR 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj" 40 CFR 60 Subpart A 567 IAC 23.1(2) 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

<u>Monitoring Requirements</u> 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 🖂

### Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
019-006	13JE	Extruder	Polypropylene	2,000 lb/hr

# **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.

None required at this time.

### **Operational Limits & Requirements**

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

### **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart JJJJ
	567 IAC 23.1(4)"cj"

### **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 🖂

## Associated Equipment

Emission Unit vented through this Emission Point: 14JE Emission Unit Description: 14J Extruder Raw Material/Fuel: Polypropylene Rated Capacity: 2,000 lb/hr

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.

None required at this time.

## **Operational Limits & Requirements**

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

None required at this time.

#### 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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
14JCT	Corona Treater	Electricity	20 kW	90-A-364-S2

# **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: Ozone Emission Limit(s): 1.44 lb/hr

Authority for Requirement: DNR Construction Permit 90-A-364-S2

# **Operational Limits & Requirements**

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

None required at this time.

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 45 Stack Opening, (inches): 12 Exhaust Flow Rate (scfm): 4,160 Exhaust Temperature (°F): 72 Discharge Style: Vertical Unobstructed Authority for Requirement: DNR Construction Permit 90-A-364-S2

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
7NDL1	7N Maker – Delamination Operation	Acrylic Acid	60 ft/min	94-A-166-S1

# **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: Opacity Emission Limit(s): 5 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 94-A-166-S1 567 IAC 23.3(2)"d"

<sup>(1)</sup>Visible emissions will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Volatile Organic Compounds (VOC) Emission Limit(s): 1.46 lb/hr Authority for Requirement: DNR Construction Permit 94-A-166-S1

# **Operational Limits & Requirements**

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

- A. The owner or operator shall follow the applicable requirements of the NSPS, Subpart RR, 40 CFR §60.440 - §60.447.
- B. The owner or operator shall follow the applicable requirements of the NESHAP, Subpart JJJJ, 40 CFR §63.3280 - §63.3410.

Authority for Requirement: DNR Construction Permit 94-A-166-S1 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj" 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

# **NSPS and NESHAP Requirements**

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

This emission unit is subject to the requirements of 40 CFR 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement:	DNR Construction Permit 94-A-166-S1 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj" 40 CFR 60 Subpart A 567 IAC 23.1(2) 40 CFP 60 Subpart PP
	40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 54 Stack Outlet Dimensions, (inches): 10 Exhaust Flow Rate (scfm): 2,000 Exhaust Temperature (°F): 72 Discharge Style: Vertical unobstructed Authority for Requirement: DNR Construction Permit 94-A-166-S1

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 characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

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

# **Opacity Monitoring**

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no

visible emissions, then a Method 9 observation will be required. If an opacity (>5 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

# Associated Equipment

Emissio Unit	<sup>1</sup> Emission Unit Description	Raw Material/Fuel	Rated Capacity
7NDM	7N Drum Pump & Mixing (1 <sup>st</sup> and 2 <sup>nd</sup> floor)	Adhesive	6.85 gal/hr

# **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.

None required at this time.

## **Operational Limits & Requirements**

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

None required at this time.

# **NSPS and NESHAP Requirements**

None required at this time.

# **Monitoring Requirements**

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

Yes 🗌 No 🖂
Yes 🗌 No 🖂
Yes 🗌 No 🖂

## Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
13JCT	Two-sided Corona Treater	Electricity	2-10  kW	98-A-1164-S1

# **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.

None are required at this time.

## **Operational Limits and Requirements**

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

None are required at this time.

## **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 47 Stack Diameter (inches): 12 Stack Exhaust Flow Rate (scfm): 3,240 Stack Temperature (°F): 70 Discharge Style: Vertical unobstructed Authority for Requirement: DNR Construction Permit 98-A-1164-S1

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 characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 🖂

# Associated Equipment

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
AATNK	Storage Tank	Acrylic Acid	16,000 gallons; 37.7 gal/hr

# **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.

None are required at this time.

# **Operational Limits & Requirements**

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

## **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP), as applicable.

Authority for Requirement:	567 IAC 22.108(3)
	40 CFR 63 Subpart A
	567 IAC 23.1(4)"a"
	40 CFR 63 Subpart EEEE
	567 IAC 23.1(4)"ce"

# **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 🖂

# **Associated Equipment**

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
IMF2	IMF2	Previously Coated Material	40 yards/min; 56.5 inches in width	15-A-228

# **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: Volatile Organic Compounds (VOC) Emission Limit(s): 1.00 lb/hr

Authority for Requirement: DNR Construction Permit 15-A-228

# **Operational Limits and Requirements**

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

# **Operating Limits**

None at this time.

# **Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The owner or operator shall maintain a record of the material used on the line. The record shall be updated each time a different material is used on the line. If the material used is expected to increase the emissions of VOC, the facility shall seek a permit modification.

Authority for Requirement: DNR Construction Permit 15-A-228

# **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet): 40 Stack Diameter (inches): 36, tapers to 19 inches at exit Stack Exhaust Flow Rate (scfm): 8,000 Stack Temperature (°F): 72 Discharge Style: Vertical

Authority for Requirement: DNR Construction Permit 15-A-228

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 characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **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 🖂

Associated Equipment

Emission	Emission Unit	Control	Raw	Rated	Construction
Unit	Description	Equipment	Material/Fuel	Capacity	Permit
IMF 1 CT	Corona Treater	Ozone Reactor (CE 1)	Electricity	15 kW	18-A-260

# **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: Ozone Emission Limit(s): 0.05 lb/hr

Authority for Requirement: DNR Construction Permit 18-A-260

## **Operating Requirements with Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall maintain the Ozone Reactor (CE 1) according to the manufacturer's specifications and maintenance schedule. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Ozone Reactor (CE 1). This log shall include, is not necessarily limited to:
  - a. The date and time any inspection and/or maintenance was performed on the Ozone Reactor (CE 1);
  - b. Any issues identified during the inspection and the date each issue was resolved;
  - c. Any issues addressed during the maintenance activities and the date each issue was resolved; and
  - d. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 18-A-260

# **Emission Point Characteristics**

This emission point shall conform to the specifications listed below.

Stack Height (feet from the ground): 30 Stack Outlet Dimensions (inches): 12 Exhaust Flow Rate (scfm): 3,200 Exhaust Temperature (°F): 72 Discharge Style: Vertical, Unobstructed

Authority for Requirement: DNR Construction Permit 18-A-260

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 characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **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 🖂

### Emission Point ID Number: 032-001, 032-002, 032-003, 032-020 and 032-021

Emission	Emission	<b>Emission Unit</b>	Raw	Rated	Construction
Point	Unit	Description	Material/Fuel	Capacity	Permit
022 001	AF7 Coater	Main Coater		3,000 lb/hr	18-A-441-S1
032-001	MLC #1	Top MLC Die Station	Adhesive	300 lb/hr	10-A-441-51
	MLC #2	Bottom MLC Die Station			
032-002	AF7 CH	AF7 Chamber		3,300 lb/hr	18-A-442-S1
032-003	AF7 DL1	AF7 Delaminator	Tape	100 ft/min	18-A-443-S1
032-020	AF7 CH2	AF7 Oven Chamber 2	Adhesive	3,300 lb/hr	20-A-225
032-021	AF7 CH3	AF7 Oven Chamber 3	Adhesive	3,300 lb/hr	20-A-226

### Associated Equipment

### **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.

### For Emission Points 032-001, 032-002, 032-003, 032-020 and 032-021 (combined):

Pollutant: Volatile Organic Compounds (VOC) Emission Limit(s): 0.20 kg VOC/kg of coating solids <sup>(1)</sup>

Authority for Requirement:	DNR Construction Permits 18-A-441-S1, 18-A-442-S1, 18-A-443-
	S1, 20-A-225, 20-A-226
	40 CFR 60 Subpart RR
	567 IAC 23.1(2)"qq"
(1) $\mathbf{D}_{am} = 40 \text{ CED } 860 + 42(a)(1)$	alculated an a mainhead arrange havin for any calendar month

<sup>(1)</sup> Per 40 CFR §60.442(a)(1), calculated on a weighted average basis for one calendar month.

Pollutant: Total Hazardous Air Pollutants (HAP) Emission Limit(s): The owner or operator shall choose an applicable emission standard from 40 CFR §63.3320(b)(1) through 40 CFR §63.3320(b)(3). Authority for Requirement: DNR Construction Permits 18-A-442-S1, 20-A-225, 20-A-226 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj"

**For Emission Points 032-002, 032-020 and 032-021 (combined):** Pollutant: Volatile Organic Compounds (VOC) Emission Limit(s): 0.56 lb/hr

Authority for Requirement: DNR Construction Permits 18-A-441-S1, 18-A-442-S1, 18-A-443-S1

Emission Point	Opacity <sup>(2)</sup>	Particulate Matter (PM)	Volatile Organic Compounds (VOC)	Authority for Requirement
032-001	40 %	0.01 gr/dscf	0.71 lb/hr	DNR Construction Permit 18-A-441- S1, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)
032-002, 032- 020,032- 021	40 %	0.01 gr/dscf	0.56 lb/hr	DNR Construction Permit 18-A-442- S1,
032-003	40 %	0.01 gr/dscf	0.67 lb/hr	DNR Construction Permit 18-A-443- S1

### **Per Emission Point:**

<sup>(2)</sup>An exceedance of the indicator opacity of "No Visible Emissions" will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

### **Operating Requirements with Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall not emit more than 0.20 kg VOC per kg of coating solids on a weighted average basis for one calendar month, as specified per 40 CFR §60.442(a)(1). On a monthly basis, the owner or operator shall calculate the weighted average of the mass of solvent used per mass of coating solids applied per the methodology specified in 40 CFR §60.443(a).
- B. The owner or operator shall meet all applicable monitoring and recordkeeping requirements for NSPS Subpart RR, as specified in 40 CFR §60.445.
- C. The owner operator shall choose an applicable emission standard in 40 CFR §63.3320(b)(1) through 40 CFR §63.3320(b)(3) to meet. The owner or operator shall demonstrate compliance with these emission standards using one of the methodologies specified in Table 2 of 40 CFR §63.3370(a). The applicable compliance methodologies from Table 2 are specified in 40 CFR §63.3370(b), 40 CFR §63.3370(c), or 40 CFR §63.3370(d).
- D. The owner or operator shall meet all applicable monitoring and recordkeeping requirements for NESHAP Subpart JJJJ, as specified in 40 CFR §63.3370 through 40 CFR §63.3410.

Authority for Requirement: DNR Construction Permits 18-A-441-S1, 18-A-442-S1, 18-A-443-S1, 20-A-225 and 20-A-226 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj" 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

### **NSPS and NESHAP Requirements**

These emission units are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart A, General Provisions and Subpart JJJJ, Paper and Other Web Coating, as applicable.

These emission units are subject to the requirements of 40 CFR 60 Subpart A, General Provisions and Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", as applicable. This unit is subject to the requirements of §60.442(a) as well as all other applicable sections of this subpart.

Authority for Requirement: DNR Construction Permits 18-A-441-S1, 18-A-442-S1, 18-A-443-S1, 20-A-225 and 20-A-226

40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart JJJJ 567 IAC 23.1(4)"cj" 40 CFR 60 Subpart A 567 IAC 23.1(2) 40 CFR 60 Subpart RR 567 IAC 23.1(2)"qq"

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Emission Point	Stack Height, (Feet)	Discharge Style	Stack Opening, (inches)	Stack Temperature, (°F)	Exhaust Flowrate, (SCFM)	Authority for Requirement
032-001	62	Vertical, unobstructed	18	72	6,500	18-A-441-S1
032-002	50	Vertical, unobstructed	16	72	4,500	18-A-442-S1
032-003	50	Vertical, unobstructed	12	72	2,500	18-A-443-S1
032-020	50	Vertical, Unobstructed	16	72	4,500	20-A-225
032-021	50	Vertical, Unobstructed	16	72	4,500	20-A226

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 characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> 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 Numbers:** 032-004, 032-005, 032-008, 032-012, 032-013, 032-014, 032-015, 032-016, 032-017, 032-019, 032-024, 032-025, 032-026, 032-027, 032-028, 032-029 and 032-030

### Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity	Construction Permit
	AF7 B1	Blend Vessel 1 (500 gal)			
	AF7 B2	Blend Vessel 2 (500 gal)			
	AF7 S1	AF7 Syrup Tank 1 (500 gal)			
032-004	AF7 S2	AF7 Syrup Tank 2 (500 gal)	Adhesive	500 gal/hr	19-A-416-S1
	AF7 S3	AF7 Syrup Tank 3 (500 gal)			
	AF7 S4	AF7 Syrup Tank 4 (500 gal)			
	AF7 S5	AF7 Syrup Tank 5 (500 gal)			
032-005	AF7 Poly 3	AF7 Poly 3 (30 gal)	Adhesive	1,000 gal/hr	19-A-417-S1
032-008	AF7 Surfactant 1	AF7 Surfactant 1 (90 gal)	Adhesive	90 gal/hr	19-A-418-S1
	AF7 M1	AF7 Mix Tank 1 (800 gal)		800 gal/hr	19-A-419-S1
032-012	AF7 M2	AF7 Mix Tank 2 (800 gal)	Adhesive		
	AF7 M3	AF7 Mix Tank 3 (800 gal)			
032-013	AF7 Surfactant 2	AF7 Surfactant 2 (90 gal)	Adhesive	90 gal/hr	19-A-420-S1
032-014	AF7 SC	AF7 Sparge Column (10 gal)	Adhesive	500 gal/hr	19-A-421-S1
032-015	AF7 Poly 3	AF7 Poly 3 (30 gal)	Adhesive	1,000 gal/hr	20-A-215
032-016	AF7 Pigment 1	AF7 Pigment 1 (40 gal)	Adhesive	20 gal/hr	20-A-216
	AF7 M1	AF7 Mix Tank 1 (800 gal)	Adhesive	800 gal/hr	19-A-422-S1
032-017	AF7 M2	AF7 Mix Tank 2 (800 gal)			
	AF7 M3	AF7 Mix Tank 3 (800 gal)			

032-019	AF7 Pigment 2	AF7 pigment 2 (40 gal)	Adhesive	20 gal/hr	19-A-423-S1
	AF7 Surge 1	AF7 Surge Tank 1 (800 gal)			
	AF7 Surge 2	AF7 Surge Tank 2 (800 gal)			
032-024	AF7 Surge 3	AF7 Surge Tank 3 (500 gal)	Adhesive	500 gal/hr	20-A-217
	AF7 Surge 4	AF7 Surge Tank 4 (500 gal)			
	AF7 Surge 5	AF7 Surge Tank 5 (500 gal)			
032-025	AF7 Tank A121	AF7 Tank A121 (250 gal)	Adhesive	250 gal/hr	20-A-218
032-023	AF7 Tank A124	AF7 Tank A124 (250 gal)	Adnesive	250 gai/iir	20-A-218
032-026	AF7 Tank A121	AF7 Tank A121 (250 gal)	Adhesive	250 gal/hr	20-A-219
032-020	AF7 Tank A124	AF7 Tank A124 (250 gal)	Adhesive	250 gai/iii	20-A-219
032-027	AF7 Top MLC	Top MLC Day Tank (60 gal)	Adhesive	60 gal/hr	20-A-220
032-028	AF7 Bottom MLC	Bottom MLC Day Tank (60 gal)	Adhesive	60 gal/hr	20-A-221
	AF7 H Weigh	AF7 H Weigh			
032-029	Tank AF7 B Weigh	Tank (28 gal) AF7 B Weigh	Adhesive	28 gal/hr	20-A-222
	Tank	Tank (28 gal)			
032 030	AF7 B Mix Tank	AF7 B Mix Tank (200 gal)		200 gal/hr	20-A-223
032-030	AF7 B Store Tank	AF7 B Store Tank (175 gal)	Adhesive	175 gal/hr	20-A-225

### **Applicable Requirements**

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

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

Pollutant: Opacity Emission Limit(s): 40% <sup>(1)</sup> Authority for Requirement: DNR Construction Permits "See Table Above" 567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/dscf Authority for Requirement: DNR Construction Permits "See Table Above"

### **Operational Limits & Reporting/Record keeping Requirements**

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

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

- A. The permittee shall maintain the following monthly records:
  - i. The identification of each VOC-containing and HAP-containing material used in emission units listed in the List of Emission Units, Control Equip2NAment, Emission Points, and Permits Table.
- B. Emission Units (EU AF7 B1, EU AF7 B2, EU AF7 S1 through EU AF7 S5, EU AF7 Surge 1 through EU AF7 Surge 5, EU AF7 Poly 3, EU AF7 Surfactant 1, EU AF7 Surfactant 2, EU AF7 M1 through EU AF7 M3, EU AF7 Pigment 1, EU AF7 Pigment 2, EU AF7 Tank A121, EU AF7 Tank A124, EU AF7 Top MLC, EU AF7 Bottom MLC, EU H Weigh Tank, EU B Weigh Tank, EU B Mix Tank, and EU B Store Tank) shall be limited to a maximum of 8.76 million gallons of combined VOC-containing and HAPcontaining product per 12-month rolling period. The permittee shall maintain the following monthly records to show compliance with this permit:
  - i. The amount, in gallons, of combined VOC-containing and HAP-containing products produced in emission units (EU AF7 B1, EU AF7 B2, EU AF7 S1 through EU AF7 S5, EU AF7 Surge 1 through EU AF7 Surge 5, EU AF7 Poly 3, EU AF7 Surfactant 1, EU AF7 Surfactant 2, EU AF7 M1 through EU AF7 M3, EU AF7 Pigment 1, EU AF7 Pigment 2, EU AF7 Tank A121, EU AF7 Tank A124, EU AF7 Top MLC, EU AF7 Bottom MLC, EU H Weigh Tank, EU B Mix Tank, and EU B Store Tank).

- ii. Calculate and record the combined 12-month rolling total of all VOC-containing and HAP-containing products produced in emission units (EU AF7 B1, EU AF7 B2, EU AF7 S1 through EU AF7 S5, EU AF7 Surge 1 through EU AF7 Surge 5, EU AF7 Poly 3, EU AF7 Surfactant 1, EU AF7 Surfactant 2, EU AF7 M1 through EU AF7 M3, EU AF7 Pigment 1, EU AF7 Pigment 2, EU AF7 Tank A121, EU AF7 Tank A124, EU AF7 Top MLC, EU AF7 Bottom MLC, EU H Weigh Tank, EU B Weigh Tank, EU B Mix Tank, and EU B Store Tank)
- C. The owner or operator shall only use HAP-containing materials where the HAP(s) is considered a VOC(s). The owner or operator shall not use any surfactants containing HAPs.
  - i. The owner or operator shall maintain Safety Data Sheets (SDS)s of all materials used in the emission unit, which clearly indicates the VOC and HAP content of the material.
- D. The owner or operator shall not exceed the worst-case formulation emission factor for any product(s) reformulation and additional product(s). The worst-case formulation emission factor is based on the ambient pressure, ambient temperature, maximum volumetric flow rate, maximum VOC concentration of 85%, and maximum HAP concentration of 15%, where the HAP is considered a VOC.
  - i. The owner or operator shall calculate the worst-case formulation emission factors for emission units (EU AF7 B1, EU AF7 B2, EU AF7 S1 through EU AF7 S5, EU AF7 Surge 1 through EU AF7 Surge 5, EU AF7 Poly 3, EU AF7 Surfactant 1, EU AF7 Surfactant 2, EU AF7 M1 through EU AF7 M3, EU AF7 Pigment 1, EU AF7 Pigment 2, EU AF7 Tank A121, EU AF7 Tank A124, EU AF7 Top MLC, EU AF7 Bottom MLC, EU H Weigh Tank, EU B Weigh Tank, EU B Mix Tank, and EU B Store Tank).
  - ii. The worst-case formulation emission factors shall be kept onsite and provided to the Department, if requested.
- E. The emission factors for each emission unit (EU AF7 B1, EU AF7 B2, EU AF7 S1 through EU AF7 S5, EU AF7 Surge 1 through EU AF7 Surge 5, EU AF7 Poly 3, EU AF7 Surfactant 1, EU AF7 Surfactant 2, EU AF7 M1 through EU AF7 M3, EU AF7 Pigment 1, EU AF7 Pigment 2, EU AF7 Tank A121, EU AF7 Tank A124, EU AF7 Top MLC, EU AF7 Bottom MLC, EU H Weigh Tank, EU B Weigh Tank, EU B Mix Tank, and EU B Store Tank) shall be calculated by using the methodology specified in Emission Inventory Improvement Program (EIIP) Volume II Chapter 16: Methods of Estimating Air Emissions from Chemical Manufacturing Facilities, February 2005 version.

Authority for Requirement: DNR Construction Permits 19-A-416-S1, 19-A-417-S1, 19-A-418-S1, 19-A-419-S1, 19-A-420-S1, 19-A-421-S1, 19-A-422-S1, 19-A-423-S1, 20-A-215, 20-A-216, 20-A-217, 20-A-218, 20-A-219, 20-A-220, 20-A-221, 20-A-222 and 20-A-223

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

EP ID	Stack Height, Feet	Discharge Style	Stack Opening, inches	Stack Temperature, °F	Exhaust Flowrate, SCFM
032-004	49	Horizontal	2	72	7
032-005	65	Vertical, unobstructed	12	72	2,500
032-008	7	Horizontal	2	72	2
032-012	38	Horizontal	3	72	3
032-013	3	Horizontal	1	72	2
032-014	50	Horizontal	4	72	30
032-015	38	Horizontal	1	72	2
032-016	40	Vertical, unobstructed	1	72	1
032-017	38	Horizontal	2	72	7
032-019	41	Vertical, unobstructed	1	72	1
032-024	59	Vertical, unobstructed	1	72	7
032-025	41	Vertical, unobstructed	1	72	1
032-026	41	Vertical, unobstructed	4	72	3
032-027	45	Horizontal	1	72	3
032-028	45	Horizontal	1	72	3
032-029	50	Horizontal	1	72	4
032-030	38	Horizontal	1	72	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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

<u>Monitoring Requirements</u> *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: 00X-00X (Fugitives)

Emission Unit	Emission Unit Description	Raw Material/Fuel	Rated Capacity
Transfer Rack 6	Recovered Xylene Loadout	Xylene	Unknown
TR Comp RM1	Toluene Transfer Rack to Compounding	Toluene	2.292 gal/hr
Coating MIXRM TR	Toluene Transfer Rack to Coating Mix Room	Toluene	2.295 gal/hr
General W/O ELC	Applicable General Piping and Transfer Racks without Electronic Level Control	Toluene, Acrylic Acid	Unknown
General W/ELC	Applicable General Piping and Transfer Racks without Electronic Level Control	Toluene, Acrylic Acid	Unknown

Associated Equipment

### **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.

None are required at this time.

### **Operational Limits and Requirements**

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

### **NSPS and NESHAP Requirements**

This emission unit is subject to Subparts A (General Provisions, 40 CFR §63.1 - §63.15) and Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: *Organic Liquids Distribution (Non-Gasoline)*, §63.2330 – §63.2406) of the National Emission Standards for Hazardous Air Pollutants (NESHAP), as applicable.

Authority for Requirement: 567 IAC 22.108(3) 40 CFR 63 Subpart A 567 IAC 23.1(4)"a" 40 CFR 63 Subpart EEEE 567 IAC 23.1(4)"ce"

<u>Monitoring Requirements</u> 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 🖂
<b>Compliance Assurance Monitoring (CAM) Plan Required?</b> Authority for Requirement: 567 IAC 22.108(3)	Yes 🗌 No 🖂

## **IV. Emission Points Without Specific Conditions**

The following emission units do not have any specific emissions limits, therefore monitoring is not required. The emission units are grandfathered from construction permitting until a modification takes place. The owner/operator shall comply with all applicable requirements that become effective during the permit term.

Emission Point ID	Emission Unit ID	Description	Raw Material/Fuel	Rated Capacity
010-001	Tank 1	Tank	Solvent	30,000 gals.
010-002	Tank 2	Tank	Solvent	30,000 gals.
010-003	Tank 3	Tank	Solvent	30,000 gals.
010-004	Tank 4	Tank	Solvent	30,000 gals.
010-005	Tank 5	Tank	Solvent	30,000 gals.
010-007	Tank 7	Tank	Solvent	30,000 gals.
004-085	2NB ADH	SOL Storage Tank	Adhesive	180 gal/hr
005-046	CR2 2N	Mixer	Solvent/ Rubber/ Resin	375 gal/hr
005-047	CR1 MT1	Mix Vessel	Coatings	90 gal/hr
005-049	CR1HT1	Hold Tank	Solvent	90 gal/hr
005-050	CR1HT2	Hold Tank	Solvent	90 gal/hr

### V. 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"

6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 22.108(15)"c"* 

### **G2.** Permit Expiration

1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). *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 submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, 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 U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. 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 emissions inventory shall be submitted annually by March 31 through the electronic format specified by the department documenting actual emissions for the previous calendar year.4. The fee shall be submitted annually by July 1 with forms specified by the department.

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:

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;
 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) 725-8694 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. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. 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. Initial 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 initial 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 initial report may be made by electronic mail (E-mail), 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 initial 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 situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include 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 fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *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(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 (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 - 22.144(455B));.

e. The changes comply with all applicable requirements.

f. For each such 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. 567 IAC 22.110(1)

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 does 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 Title V Permit Modification.

a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:

i. Do not violate any applicable requirement;

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 an 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 under rule 567 - 22.113(455B).

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 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, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

3. Significant Title V 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, as those requirements that apply to Title V issuance and renewal.

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 22.111-567 IAC 22.113

### **G19.** Duty to Obtain Construction Permits

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. *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 (567 IAC 23.1(3)"a"); training fires and controlled burning of a demolished building (567 IAC 23.2).

### G21. Open Burning

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. 567 IAC 23.2 <u>except</u> 23.2(3)"j"; 567 IAC 23.2(3)"j" - 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. ("MVAClike 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 ozonedepleting 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 or greenhouse gas generating substances 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 <u>not</u> required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is <u>not</u> 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 <u>not</u> 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)

5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. 567 IAC 22.114(3)

### 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 consistent with the requirements of 567 IAC 22.111(1). 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. 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. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. 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 Wallace State Office Building 502 E 9<sup>th</sup> St. Des Moines, IA 50319-0034 (515) 725-9526

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:

Iowa Compliance Officer Air Branch Enforcement and Compliance Assurance Division U.S. EPA Region 7 11201 Renner Blvd. Lenexa, KS 66219 (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 Wallace State Office Building 502 E 9<sup>th</sup> St. Des Moines, IA 50319-0034 (515) 725-8200 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

1101 Commercial Court, Suite 10 Manchester, IA 52057 (563) 927-2640

### Field Office 3

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

### **Field Office 5**

Wallace State Office Building 502 E 9<sup>th</sup> St. Des Moines, IA 50319-0034 (515) 725-0268

### Polk County Public Works Dept.

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

### Field Office 2

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

### **Field Office 4**

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

### **Field Office 6**

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

### Linn County Public Health

Air Quality Branch 1020 6<sup>th</sup> St SE Cedar Rapids, IA 52401 (319) 892-6011

## VI. Appendix A

- A. 40 CFR Part 60 Subpart A General Provisions for New Source Performance Standards http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.7.60.a
- B. 40 CFR Part 60 Subpart RR New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.7.60.rr</u>
- C. 40 CFR Part 60 Subpart IIII New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.7.60.iiii</u>
- D. 40 CFR 63 Subpart A General Provisions for National Emission Standards for Hazardous Air Pollutants <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.10.63.a</u>
- E. 40 CFR 63 Subpart KK National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.11.63.kk
- F. 40 CFR Part 63 Subpart EEEE National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline) <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.13.63.eeee</u>
- G. 40 CFR Part 63 Subpart FFFF National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.13.63.ffff</u>
- H. 40 CFR 63 Subpart JJJJ National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coatings <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.13.63.jjjj</u>
- I. 40 CFR Part 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.14.63.zzzz</u>
- I. 40 CFR Part 63 Subpart DDDDD National Emission Standard for Hazardous Air Pollutants Industrial, Commercial, and Institutional Boilers and Process Heaters <u>http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.14.63.ddddd</u>
- K. 40 CFR 63 Subpart HHHHH National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.14.63.hhhhh