ADVANCED-APPROVED CHANGES

Imation, Weatherford Oklahoma (Products for the Printing and Publishing industry for graphics arts and Data Storage Products) - specified changes, classes of changes, raw material

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Process Description

The Imation flexible permit includes Advance-approvals. Permit language specifying this is given below and includes an itemized listing of each specific activity that is pre-approved. Additional requirements related to the Advance-approvals are provided in Section H, subsection 2 of the permit.

Section H, Subsection 1

1. Preapproved activities that are authorized by this permit include:

a) Raw material changes

b) VOL storage tanks -- addition of one (1) or more VOL storage tanks;

c) Boilers -- replacement of one (1) or more of the existing boilers with a boiler having a maximum rated heat input capacity of less than 100 MMBTUH

d) EUG-5-alternative control devices as allowed by MACT
- Use of alternative control devices, or
- Combined usage of low-VOC coatings and a control device, or

e) EUG-5-related changes and/or new magnetic tape coating line
- Modification or reconstruction of EUG-5 subject to 40 CFR 63 Subpart A, 40 CFR 63 Subpart EE, and OAC 252:100-8; or
- Modification and/or utilization of EUG-5 in a manner by which it would become part of the source category "Paper and Other Web Coating," or
- Installation or construction of one or more entirely new coating lines or related equipment subject to 40 CFR 63 Subpart A, 40 CFR 63 Subpart EE, and 252: OAC 100-8

f) Coater 12W and/or 15W reconstruction – changes that would be a

reconstruction under 40 CFR 63 Subpart A, and would be subject to OAC 252:100-8, and/or changes that would be subject to Section 112(g) of the Clean Air Act under the source category *Paper and Other Web Coating*.

g) Coater 12W and/or 15W modifications – changes which are not reconstructions under 40 CFR 63 Subpart A but which are subject to OAC 252:100-8

h) Installation of new coating line(s) subject to the source category *Paper and Other Web Coating* -- installation of one or more new coating lines with associated supporting equipment (such as that for mixing and milling of coating solutions), to which no standard applies under 40 CFR Part 60 but which is subject to OAC 252:100-8 and 112(g) of the Clean Air Act under the source category *Paper and Other Web Coating*

i) Raw materials handling -- modification of existing equipment or installation of new equipment for handling and processing raw materials and which operations generate particulate emissions

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Section H, Subsection 2

1. The owner or operator is permitted to implement any of the changes identified in Section H, Subsection 1, Specific Condition 1, subject to the conditions herein and the emission limits of Section A, Specific Condition No. 2 or Section H, Specific Condition 2. Each alternative scenario approved below is required to comply with the appropriate state and federal regulations.

a. Raw material changes [OAC 252:100-41]

Approval for use of any new raw materials is based on compliance with Section H, Subsection 5, Specific Conditions No. 1, 2, and 3 of this permit.

b. VOL storage tanks: [40 CFR 60 Subpart Kb and OAC 252:100-37]

i) Any tanks installed or constructed which are of such size equal to or greater than 40 m^3 (10,567 gal) and which store VOLs with vapor pressure of 1.5 psia or greater must be equipped with a permanent submerged fill pipe or other organic recovery system to comply with OAC 252:100-37 and are subject to this Subpart as described below:

ii) 40 CFR 60.112b sets standards for volatile organic compound tanks meeting the following criteria:

Capacity m^3 (gal)	Vapor Pressure kPa (psi)
≥ 151 (39,890)	≥ 5.2 (0.75), < 76.6 (11.11)
≥ 75 (19,813), < 151 (39,890)	≥ 27.6 (4.00), < 76.6 (11.11)

iii) These tanks shall have one of the following control schemes:

a) Fixed roof with internal floating roof
b) External floating roof
c) Closed vent system with control device

c. Boiler replacements: [40 CFR 60 Subpart Dc Requirements]

i) The boiler is subject to:

Cit. (40 CFR 60)	
42c	SO_2 standards for burning wood, coal, or oil as fuel (no oil with > 0.5 % weight sulfur can be burned)
43c	Particulate matter standards for burning wood, coal, or oil as fuel (no opacity > 20% (6 minute avg.), except for one 6 minute period/hr of not more than 27% opacity)

ii) Use of pipeline grade natural gas as fuel will constitute compliance with the standards for SO_2 and particulate matter. Diesel fuel used to fire the fuel burning equipment shall not contain greater than 0.5% by weight sulfur. [OAC 252:100-100-31]

d. EUG-5 – alternative control devices and methods

i) Emission control devices and/or methods not presently used by EUG-5 may be used to the extent that the following Specific Conditions of Section B of this permit, as applicable, are met: 13 through 23; and the following standards are met.

Cit. (40 CFR 63)	
703(c)(3)	Any room, building, or enclosure in which the HAP emission point is located may be vented to an add-on air pollution control device

ii) In lieu of controlling HAP emissions from Coater 51 of EUG-5 according to Section H, Subsection 2, Specific Condition 1.d(i), coating solutions may be used which have a HAP density of $\leq$0.18 kg HAP per liter of coating solids. [40 CFR 63.703(c)(5)]

iii) In lieu of controlling HAP emissions from each solvent storage tank associated with EUG-5 according to Section H, Subsection 2, Specific Condition 1.d(i), a higher level of control may be applied to the coater according to 703(c)(4). [40 CFR 703(c)(4)]

iv) The vent of any HAP storage tank of a 40 CFR 63 Subpart EE affected source may be controlled through use of any thermal oxidizer, solvent recovery unit, or other VOC control device of the facility. The control device shall be operated during each occasion that the tank is filled with solvent. [40 CFR 63.703(c)]

v) Alternative emissions limits may be established according to 63.703(i) except for Coater 51 and except for any HAP emissions controlled by an incinerator. [40 CFR 63.703(i)]

vi) In lieu of Section B, Specific Condition 21, the permittee may also control bypass vents by [40 CFR 63.704(c)(10)]:

1. Installing, calibrating, maintaining and operating a flow indicator that provides a record of vent stream flow at least once every 15 minutes. The flow indicator shall be installed at the entrance to any bypass line that could divert the vent stream away from the control device to the atmosphere; or
2. Securing any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; a visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and the vent stream is not diverted through the bypass line; or
3. Ensuring that any bypass line valve is in the closed position through continuous monitoring of valve position, the monitoring system shall be inspected at least once every month to ensure that it is functioning properly; or
4. Using an automatic shutdown system in which any HAP emitting operations are diverted away from the control device to any bypass line; the automatic system shall be inspected once every month to ensure that it is functioning properly.

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g. Coater 12W and/or 15W modifications

i) Meet the requirements of BACT according to Section H, Subsection 4, Condition 1 of this permit.

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i. New particulate-generating raw materials handling

i) Must apply BACT, i.e., a fabric filter, baghouse or similar device as stated under 40 CFR 63.703(d)(2) [OAC 252:100-27-7]

ii) Must ensure that emissions on a process weight rate-basis are less than those allowed under OAC 252: 100-27-5.

Emissions Monitoring Technique - Monitoring

Example permit monitoring language for the Advance-approval is given below.

Section H, Subsection 3

1. Compliance monitoring and record-keeping for new construction, reconstruction, or modifications described in Section H, Subsection 1, Specific Condition 1 shall, to the extent needed to determine and confirm emissions, include: [OAC 252:100-45]

a) Fuel usage in gallons for diesel and MCF for natural gas (daily and cumulative annual)

b) Raw materials used listed by name and weight (daily and cumulative annual)

c) Production rates (daily and cumulative annual)

d) Operating schedules including operating hours (daily and cumulative annual)

e) Emissions (in pounds per day and cumulative annual in TPY)

2. The pre-approved activities listed in Section H, Subsection 1, Specific Condition 1 are subject to the following monitoring regulations:

Pre-approval	**Cit.** (40 CFR)	**Monitoring**
VOL storage tanks, according to Section H, Sub. 1, Specific Condition 1(b)		
Fixed roof with internal floating roof	60.116b	Dimensions, capacity, vapor pressure of stored material (if > 75 m^3 capacity)
External floating roof	60.116b	Dimensions, capacity, vapor pressure of stored material (if > 75 m^3 capacity)
Closed vent system with control device	60.116b	Dimensions, capacity, vapor pressure of stored material (if > 75 m^3 capacity)
Boilers, according to Section H, Sub. 1, Specific Condition 1(c)		
Boiler (< 100 MMBTUH)	60.46c	CEMS for SO_2, or sulfur content determination for #2 fuel oil (<0.5% by weight sulfur)
EUG-5 changes, new coating lines, and/or reconstruction of 12W and/or 15W, according to Section H, Sub. 1, Specific Condition 1(d), (e), (f), and/or (h)		
Control by: Thermal Oxidizer		All applicable requirements of Section C, Specific Conditions 3, 4, 5
Control by: Catalytic Oxidizer	63.704(b)(4)	Site-specific operating parameter to be minimum gas temperature upstream of the catalyst bed and minimum temperature difference measured across the catalyst bed
	63.704(c)(2)(ii) 63.705(j) 63.8(c)(1)(iii)	Gas temperature shall measured by a CMS consisting of a thermocouple which has been installed, calibrated, maintained, and operated according to the manufacturer's specifications. The thermocouple calibration shall be verified every 3 months using CMS manufacturer's procedures for operation and maintenance or the thermocouple shall be replaced according to any one of the following intervals: 3 months, or as

		specified by the manufacturer of the thermocouple, or recommended by National Institute of Standards Technology (NIST, formerly National Bureau of Standards) NBS Monograph 125 National Bureau of Standards, Washington D.C. 1979.
	63.704(c)(3)(iv)	For the value of the site specific operating parameter, the compliance averaging period shall be 3 hours.
	63.704(c)(6)	The thermocouple shall be installed to measure continuously the gas temperature both upstream and downstream of the catalyst bed whenever HAP from magnetic tape manufacturing operations are vented to the control device
Control by: Low-HAP coatings (for control of the coating operation only)	63.704(c)(8)	Compliance demonstration .
Control by: Regenerative Carbon Adsorption	63.704(b)(1)(i) 63.704(b)(1)(ii) 63.704(b)(9)	Site-specific operating parameter to be: • Exhaust concentration of the control device • Control device efficiency, or • Material balance
	63.704(c)(3)(ii) 63.704(c)(3)(iii)	If the site-specific operating parameter is the control device; efficiency of the control device or the outlet concentration -- compliance basis for individual vs. common stacks from carbon adsorption vessels
	63.704(c)(9)	The following sections of 63.8 do not apply: (b)(2) and (3), (c), (d), (e), (f), and (g)(1), and (2)
Control by: Non-regenerative Carbon Adsorption	63.704(b)(1)(i), (ii), (iii), 63.704(b)(9), 63.704(b)(5)	Site-specific operating parameter to be the exhaust concentration of the control device, the control device efficiency, a design evaluation, a material balance, or a calculated carbon-replacement interval
	63.704(c)(3)(i)(C)	Can meet 63.704(c)(3)(i)(A) or 63.704(c)(3)(i)(B) by portable monitoring device
	63.704(c)(3)(ii), 63.704(c)(3)(iii)	Compliance basis for individual vs. common stacks from carbon adsorption vessels
	63.704(c)(3)(v)	Compliance demonstration -- monitor the VOC or HAP concentration of the adsorber exhaust, or periodic, predetermined replacement of the carbon
Control by: Condenser	63.704(b)(2), 63.704(b)(9)	Site-specific operating parameter: maximum temperature of the condenser vapor exhaust stream, or a material balance

63.704(c)(2)(ii) 63.705(j) 63.8(c)(1)(iii)	Gas temperature shall measured by a CMS consisting of a thermocouple which has been installed, calibrated, maintained, and operated according to the manufacturer's specifications. The thermocouple calibration shall be verified every 3 months using CMS manufacturer's procedures for operation and maintenance or the thermocouple shall be replaced according to any one of the following intervals: 3 months, or as specified by the manufacturer of the thermocouple, or as recommended by National Institute of Standards Technology (NIST, formerly National Bureau of Standards), NBS Monograph 125, National Bureau of Standards, Washington D.C., 1979.
63.704(c)(4)	Compliance demonstration (operating parameter is the temperature).
63.704(c)(9)	If operating parameter is material balance, the following sections of 63.8 do not apply: (b)(2) and (3), (c), (d), (e), (f), and (g)(1), and (2)
63.704(c)(3)(iv)	Compliance averaging period = avg. control efficiency or avg. outlet concentration calculated for any 3-hr period

3. General monitoring requirements that are applicable to all types of pollution control devices under Section H, Subsection 1, Specific Conditions 6, 7, 8, 9 and Condition d, e, f, and/or h

Cit.(40CFR63)	
704(b)(8)	Operating parameter value to be arithmetic avg. of measured values
704(b)(11)(i)	Can establish different operating parameter values for different operating conditions
704(b)(11)(ii)	Except for control by an oxidizer, can establish an alternate outlet concentration limit
704(c)(2)(iii)	Combination of emission points to a single control device – required to monitor the single control device only, not each emission point
704(c)(3)(i)(A)	If operating parameter is control device efficiency, CMS to measure continuously the total HAP or VOC concentration at both the inlet and the outlet
704(c)(3)(i)(B)	If operating parameter is control device outlet concentration, CMS at outlet of control device
8(b)(3)	Use of and reporting of multiple and backup CMSs
8(f)	Use of an alternative method approved by AQD

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Emissions Monitoring Technique - Performance Testing

Example permit language related to performance testing of Advance-approvals is given below.

Section H, Subsection 4

1. Compliance with minor New Source Review (NSR) and OAC 252:100-41 requirements for BACT for State toxics, hazardous air pollutants, and VOCs is accomplished through permit Section H, Subsection 5, Specific Condition No. 1 (C)(3) and this specific condition. This specific condition makes it a requirement for the introduction of a new Category A level toxic, new, modified, or replaced equipment approval under the specific condition to incorporate BACT and specifies what control technology and methods constitute BACT. The BACT control efficiencies and requirements comply with the requirements of 40 CFR 63, Subpart EE.

BACT includes the following:

A. Implementation of a Pollution Prevention (P2) program which meets the requirements of Section G, Specific Condition No. 1.

B. For all new, modified, or replaced production lines, the VOC emissions shall be routed through a thermal oxidizer, catalytic oxidizer, or equivalent device that shall maintain a minimum overall control efficiency (capture x destruction or recovery) which is defined as an 80% capture efficiency and a 95% destruction or recovery efficiency or their combined equivalent.

C. Emissions from the use of any Category A toxic not listed in Section A, Specific Condition No. 2 shall be routed through a thermal oxidizer, catalytic oxidizer, or equivalent device that shall maintain a minimum overall control efficiency (capture x destruction or recovery) which is defined as an 80% capture efficiency and a 95% destruction or recovery efficiency or their combined equivalent.

D. At such time as AQD administers a Maximum Achievable Control Technology (MACT) rule for one or more HAPs applicable to a portion of, or all of, the facility, the MACT will satisfy BACT for the affected source(s) and OAC 252:100-41 will cease to be applicable for the affected source(s) for those HAPs.

E. For new construction, reconstruction, or modifications, BACT may be considered on a case by case basis, at the option of and by the permittee, and no additional controls may be appropriate. In this case, the permittee shall submit a letter/application for this designation from AQD, which if approved, will be incorporated into the permit through a letter from AQD to the permittee. Notification shall be submitted to AQD prior to the construction, reconstruction, or modification and must include the following:

(1) A cost economic impact analysis that addresses average and incremental cost effectiveness. Cost effectiveness is the dollars per ton of pollutant emissions reduced. Incremental cost is the dollar per incremental ton reduced.

(2) Average cost effectiveness ($/ton removed) shall be calculated as:

$$\frac{\text{Control Option Annualized Cost}}{\text{Baseline Emissions Rate - Control Option Emissions Rate}}$$

(3) A control alternative whose analysis that has an average cost effectiveness greater than $2500/ton removed shall be, for the duration of this permit, deemed inappropriate.

During the term of this permit the BACT determination provided under this condition shall be reviewed by the permittee eighteen (18) months following the date of the permit and submitted to AQD with the pollution prevention leadership review.

2. For purposes of any new construction, reconstruction, or modification of any major source of hazardous air pollutants that occurs at the Printing and Publishing facility prior to the end of this permit term and prior to the promulgation of an applicable MACT, MACT shall be acceptable as the BACT outlined in Section H, Subsection 4, Specific Condition No. 1. [OAC 252:100-8-6(a)(1)]

3. Preapproved activities as listed in Section H, Subsection 1 are subject to the following compliance, performance testing, and procedures regulations:

Pre-approval	***Cit.*** (40 CFR)	**Compliance and performance testing procedures**
VOL storage tanks, according to Section H, Sub. 1, Specific Condition 1(b)		
Fixed roof with internal floating roof	60.113b(a)	Testing procedures
External floating roof	60.113b(b)	Testing procedures
Closed vent system with control device	60.113b(c)	Testing procedures
Boilers, according to Section H, Sub. 1, Specific Condition 1(c)		
Boiler (< 100	60.11	Opacity compliance and standards

MMBTUH)		
	60.44c	SO_2 compliance and tests if burning coal, oil, or wood as fuel
	60.45c	Particulate matter compliance and tests if burning coal, oil, or wood as fuel

EUG-5 changes, new coating lines, and/or reconstruction of 12W and/or 15W, according to Section H, Sub. 1, Specific Condition 1(d), (e), (f), and/or (h)

Control by: Thermal Oxidizer (without total enclosure)	63.705(c)(2)	General criteria for compliance demonstration -- gaseous emission test of the control device.
Control by: Catalytic Oxidizer	63.705(c)(2)	General criteria for compliance demonstration -- gaseous emission test of the control device.
Control by: Low-HAP coatings (for control of coating only)	63.705(c)(5)	Determine the mass of HAP contained in the coating per volume of coating solids applied for each batch of coating applied.
Control by: Regenerative Carbon Adsorption	63.705(c)(1)	For emissions from the affected coating operations that are controlled by a dedicated solvent recovery device, the permittee may perform a liquid-liquid HAP or VOC material balance over rolling 7-day average.
	63.705(c)(2)	Compliance demonstration (where there is a single stack for the one or more beds of the fixed-bed carbon adsorption system) is a test of gaseous emissions from the control device and the enclosure (except for total enclosures).
	63.705(c)(3)	Compliance demonstration (where there are individual exhaust stacks for each carbon adsorber vessel) is a test of gaseous emissions from the control device and the enclosure (except for total enclosures).
Control by: Non-regenerative Carbon Adsorption	63.705(c)(1)	If the affected coating operations of the affected source are controlled by a dedicated solvent recovery device -- may perform a liquid-liquid HAP or VOC material balance over rolling 7-day periods.
	63.705(c)(6)	Alternative compliance demonstration -- design evaluation
	63.705(c)(2)	Compliance demonstration (where there is a single stack for the one or more beds of the fixed-bed

		carbon adsorption system) is a test of gaseous emissions from the control device and the enclosure (except for total enclosures).
	63.705(c)(3)	Compliance demonstration -- where there are individual exhaust stacks for each carbon adsorber vessel -- gaseous emission test of the control device and the enclosure (except for total enclosures)
Control by: Condenser	63.705(c)(1)	If only the affected coating operations of the affected source are controlled by a dedicated solvent recovery device -- may perform a liquid-liquid HAP or VOC material balance over rolling 7-day periods
	63.705(c)(2)	General criteria for compliance demonstration -- gaseous emission test of the control device and testing of the enclosure (except for total enclosures)

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Emissions Monitoring Technique - Recordkeeping and Reporting

Example permit language related to recordkeeping and reporting of Advance-approvals is given below.

Section H, Subsection 5

1. Substitution of raw materials is authorized under the following circumstances: [OAC 252:100-45, OAC 252:100-8-6(h)]

A. Substitution of raw materials resulting in VOC emissions that are less than or equal to the amounts stated in Section A, Specific Condition 3 of this permit, and resulting in lesser or equal emissions of each toxic material emitted at or above de minimis levels and authorized in this permit may be made provided records of the composition of the alternative raw material are kept.

B. Substitution of raw materials which would result in VOC emissions that are less than or equal to the amounts stated in Section A, Specific Condition 3 of this permit, and resulting in a de minimis (according to OAC 252:100-41-43) addition of any toxic air pollutant not previously emitted is authorized provided sufficient records of usage, retention, and capture and control efficiency are maintained.

C. Substitution of raw materials which would result in VOC emissions that are less than or equal to the amounts stated in Section A, Specific Condition 3 of this permit, and resulting in either an increase above de minimis levels of OAC 252:100-41-43 of any toxic air pollutant not previously emitted or any increase of a toxic air pollutant previously emitted is authorized provided the following procedures are followed and stated analyses are submitted to Air Quality at least 10 working days prior to making the substitutions, and

provided sufficient records of usage, retention, and capture and control efficiency are maintained.

1. Any toxic that will be emitted that has not previously been evaluated by AQD and is not listed on the State Air Toxic List must be categorized and have a MAAC developed by AQD. Protocol for this development is in Section H, Subsection 5, Specific Condition Nos. 2 and 3.

2. For the term of this permit and for the purposes of emitting new organic solvent emissions or new Category A toxics, BACT is acceptable as described in Section H, Subsection 4, Specific Condition No. 1 with an overall control efficiency (capture x destruction or recovery) which will be defined as an 80% capture efficiency and a 95% destruction or recovery efficiency or their combined equivalent as a minimum.

3. A demonstration of compliance with the Maximum Acceptable Ambient Concentration (MAAC) shall be prepared using an EPA approved steady-state model. Modeling shall be performed on a 24-hour average basis. Building downwash shall be utilized in all modeling demonstrations. A minimum receptor spacing of 100 meters shall be used out to beyond the point of maximum off-property impacts. Meteorological data shall either be pre-programmed windspeed/stability combinations in the models or the five most recently available years from Oklahoma City and/or Norman. Nearby minor sources (100 TPY or less) may be excluded from modeling if they are 5 kilometers or more from the source that is being modeled. Modeling shall utilize stack velocities which are lower than or equal to those anticipated, discharge temperatures which are lower than or equal to those anticipated, stack heights which are lower than or equal to those in place, and discharge points which are identical or less numerous (i.e., which would result in showing emissions at higher-than-actual concentrations) than those in place.

4. At such time as AQD administers a MACT rule for a portion of or all of the facility, the MACT will satisfy BACT for the affected source(s) and OAC252:100-41 ceases to be applicable for the affected source(s).

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4. Notification of new equipment or equipment changes or alterations where BACT is acceptable as no add-on controls shall be made to AQD as soon as possible but no later than 30 days after the installation. The notification shall include: [OAC 252:100-41]

(A) The location of the subject equipment change or addition.
(B) A description of the equipment change or addition.

(C) A cost estimate for the connection of the equipment change or addition to the existing facility control devices and/or the estimated cost for new add-on controls.
(D) A statement comparing the cost of controls to emissions reductions using the controls expressed in $/ton.

5. Notification of emissions of new toxic substances along with demonstration of any required BACT or MAAC compliance shall be made as soon as possible but no later than 30 days after first-use of such substance. Emissions of new toxic substances from the use of new raw materials shall be incorporated into the permit through a letter from AQD to the owner/operator within 15 working days after receipt by AQD of the information above. [OAC 252:100-8-6(a)]

6. Pre-approval of construction, reconstruction, or modification of the facility is permitted provided that the total facility emissions after construction, reconstruction, or modification will not result in emissions that exceed the limitations of Section A, Specific Condition No. 1 and Section H, Subsection 1, Specific Condition No. 1; that BACT is implemented as described in Section H, Subsection 4, Specific Condition No. 1; and that the permittee submits to the appropriate authority (U.S. EPA Region VI or DEQ, if granted delegation) a letter/application no later than 30 days after completion of the construction, reconstruction, or modification that, at the minimum provides the following information which complies with the provisions and requirements of 40 CFR 63.5 (e), OAC 252:100-8, and OAC 252:100-7:

(A) Applicant name and address
(B) Notification of construction, reconstruction, or modification the facility
(C) The address (physical location) of the affected source
(D) Identification of all relevant standards, applicable requirements, and state only requirements that are the basis of the application/letter and a description of or reference to any applicable test method for determining compliance with each applicable requirement and state only requirement.
(E) Commencement date of construction, reconstruction, or modification
(F) Completion date of the construction, reconstruction, or modification
(G) Date of start-up of the affected source
(H) Type and quality of HAPs or state toxics emitted by the affected source in TPY, PPH, and by CAS No. and name both before and after modification. The permittee may submit the percent reduction information if a relevant standard is established in terms of percent reduction. However, operating parameters, such as flow rate, data to verify calculations, and percent reduction reported shall be included in the submission to the extent that they demonstrate performance and compliance.
(I) Emission rates in TPY and PPH of any regulated air pollutants other that the HAPs and state toxics addressed above in part (H) and in such terms as are necessary to establish compliance consistent with each applicable standard and/or state only rule.
(J) The following information to the extent it is needed to determine or regulate

emissions:

(1) Fuels
(2) Fuel usage
(3) Raw materials (including MSDS sheets)
(4) Production rates (both short and long term), and
(5) Operating schedules

(K) Identification and description of air pollution control equipment and compliance monitoring devices or activities

(L) Calculations on which the information in this specific condition is based

(M) Identification of any increase in potential to emit for any other EU.

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8. Preapproved activities as listed in Section H, Subsection 2 are subject to the following reporting and recordkeeping regulations:

Pre-approval	**Cit.**(40 CFR)	**Reporting & Recordkeeping**
VOL storage tanks, according to Section H, Sub. 1, Specific Condition 1(b)		
Fixed roof with internal floating roof	60.7	Excess emissions and notifications
	60.115b(a)	Records of inspections
External floating roof	60.7	Excess emissions and notifications
	60.115b(b)	Control equipment requirements
VOL storage tanks, according to Section H, Sub. 1, Specific Condition 1(b)		
Tanks < 75 m^3 capacity	60.116b(a)	Term of records
	60.116b(b)	Capacity of tank
Closed vent system with control device	60.7	Excess emissions and notifications
	60.115b(c)	Keep copy of operating plan and record measured values
All VOL storage tanks	OAC 252:100-8-6	Keep records of cumulative annual solvent throughput of each storage vessel and readily available records showing dimensions and capacity of each tank.

Boilers, according to Section H, Sub. 1, Specific Condition 1(c)

Boiler (< 100 MMBTUH)	60.7	Excess emissions and notifications
	60.48c	File of design heat capacity
	OAC 252:100-8-6	Records of cumulative annual gas usage or No. 2 diesel fuel used and sulfur content of each shipment of No. 2 diesel.

EUG-5 changes, new coating lines, and/or reconstruction of 12W and/or 15W, according to Section H, Sub. 1, Specific Condition 1(d), (e), (f), and/or (h)

Control by: Low-HAP coatings	63.706(f)	HAP content of each batch of coating applied, and records of the formulation data that support the calculations
	63.707(i)(2)	Include with reports under Section F, Specific conditions 8 and 9 – if control by HAP density of coating solutions: report the HAP content of each batch of coating applied as the monitored operating parameter value in the reports.
Control by: Regenerative carbon adsorption	63.706(d)	Compliance determination by material balance – record each 7-day rolling average calculation; and certification of the accuracy of the device that measures the amount of HAP or VOC recovered.
	63.707(d)	SRU and compliance demonstration by material balance calculation: include the results of the initial material balance calculation with the notification of compliance status required by § 63.9(h).
	63.707(i)(5)	Include with reports under Section F, Specific conditions 8 and 9 any exceedances of the standard, as demonstrated through the calculation, in the reports.
Control by: Non-regenerative carbon adsorption	63.706(d)	Compliance determination by material balance – record each 7-day rolling average calculation; and certification of the accuracy of the device that measures the amount of HAP or VOC recovered.
	63.706(g)	records to support the outlet VOC or HAP concentration value or the carbon replacement time established as the site- specific operating parameter
	63.707(d)	SRU and compliance demonstration by material balance calculation: include the results of the initial material balance calculation with the notification of compliance status required by § 63.9(h).
	63.707(g)	submit the design evaluation to the permitting authority with the notification of compliance status required by §63.9(h).

	63.707(i)(5)	Include with reports under § 63.10(e): SRU and compliance demonstration by material balance: Report any exceedances of the standard, as demonstrated through the calculation, in the reports.
Control by: Condenser	63.706(d)	Compliance determination by material balance – record each 7-day rolling average calculation; and certification of the accuracy of the device that measures the amount of HAP or VOC recovered.
	63.707(d)	SRU and compliance demonstration by material balance calculation: include with the notification of compliance status required by § 63.9(h) the results of the initial material balance calculation.
	63.707(i)(5)	Include with reports under § 63.10(e) SRU and compliance demonstration by material balance: Report any exceedances of the standard, as demonstrated through the calculation, in the reports.

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13. Preapproved activities as listed in Section H, Subsection 2, are required to meet the requirements, as applicable, of Section E, Specific Condition 6 through 9 and 12, and Section F, Specific Condition 2, 3, and 5 through 11. The permittee shall also, contemporaneously with making a change from one operating scenario to another and notifying DEQ of that change, record in a log at the permitted facility a record of the scenario under which it is operating. [40 CFR 70.6(a)(9)(i)]

Emissions Calculation

The Imation flexible permit requires emissions calculations to demonstrate compliance. Example permit language requiring emissions calculations is presented below.

Section H, Subsection 5 also requires calculations that are specific to the control device option chosen for emission source EUG-5, new coating lines and/or reconstruction of 12W and/or reconstruction of 12W and/or 15W.

Section E

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13. By the last day of each month, the owner/operator shall calculate and record facility-wide total emissions of VOC for the previous calendar month. The file shall include: [OAC 252:100-8-6(a)(3)(B)]

a) Plant-wide VOC emissions in tons for the previous 12 months

b) Plant-wide daily VOC emissions in pounds per day, averaged over the preceding month (hourly emissions if requested by the appropriate regulatory authority)

c) Appropriate calculations that demonstrate a and b above

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Pollutant Control Technique

The Imation flexible permit provides pollutant control technique options for emission source EUG-5, new coating lines and/or reconstruction of 12W, and/or reconstruction of 12W and/or 15W (according to Section H, Subsection 1). Example permit language for control device selection is given below.

Alternative control device options include a thermal oxidizer, catalytic oxidizer, regenerative carbon adsorption, non-regenerative carbon adsorption, a condenser or low-HAP coatings (for control of coating only).

Section H, Subsection 1

1) Preapproved activities that are authorized by this permit include:

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e) <u>EUG-5-alternative control devices as allowed by MACT</u>

- Use of alternative control devices, or
- Combined usage of low-VOC coatings and a control device, or

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