

REQUIREMENT STREAMLINING

Imation, Weatherford Oklahoma (Printing and Publishing products for graphics arts and printing industry and Data Storage Products) - program, reporting requirements.

[Process Description](#)

Emissions Monitoring Technique

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Process Description

The Imation permit and the permit's memorandum provides for streamlining of requirements.

Memorandum, Section VIII

The Publishing and Printing facility is not subject to a MACT standard at this time but will be subject to a future MACT to be promulgated under the source category Paper and Other Web Coating. A streamlining analysis has been performed using EPA's proposed MACT for Paper and Other Web Coating and according to EPA White Paper No. 2 to subsume the future MACT for Paper and Other Web Coating under the existing MACT standard of 40 CFR 63 Subpart EE. The requirements of Section 112(g) are thereby satisfied.

Section H, Subsection 2

e. EUG-5-related changes and/or new magnetic tape coating line

- i) Meet all applicable requirements of Section H, Subsection 2, Specific Condition 1(d) of this permit.
- ii) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to also meet all requirements of 40 CFR 60 Subpart A and Subpart SSS
- iii) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are

determined to also meet all requirements of the future MACT standard for the source category *Paper and Other Web Coating*.

iv) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to be also BACT under OAC 252:100-8.

f. Coater 12W and/or 15W reconstruction

i) Must meet all applicable requirements of Section H, Subsection 2, Specific Condition 1(d) of this permit which describes alternative control devices and methods.

ii) On the basis of a streamlining analysis performed by AQD all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to also meet all requirements of 40 CFR 60 Subpart A and Subpart SSS.

iii) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to also meet all requirements of the future MACT standard for the source category *Paper and Other Web Coating*.

iv) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to also be BACT under OAC 252:100-8.

h. New coating line(s) subject to the source category *Paper and Other Web Coating*

i) Meet all applicable requirements of Section H, Subsection 2, Specific Condition 1(d) of this permit.

ii) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to also meet all requirements of 40 CFR 60 Subpart A and Subpart SSS

iii) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to also meet all requirements of the future MACT standard for the source category *Paper and Other Web Coating*

iv) On the basis of a streamlining analysis performed by AQD, all of the activities identified in Section H, Subsection 1, Specific Condition 1(e) of this permit which meet applicable

requirements under 40 CFR 63 Subpart A and Subpart EE, as identified in this permit, are determined to be also BACT under OAC 252:100-8.

Emissions Monitoring Technique - Monitoring

Specific monitoring language related to streamlining is not provided in the permit. However, the facility will follow the monitoring activities required in the most stringent rule.

Emissions Monitoring Technique – Performance Testing

Not Applicable

Emissions Monitoring Technique – Recordkeeping and Reporting

The Imation permit does not include specific recordkeeping procedures related to streamlining. However, the facility will follow the recordkeeping activities required in the most stringent rule.

Reporting language related to streamlining is presented below.

Section H, Subsection 5

7. Upon promulgation of the MACT standard for the source category *Paper and Other Web Coating*, or any other MACT standard applicable to any equipment which has become an affected facility through implementation of a modification, reconstruction or construction under Section H, Subpart 2, an initial notification shall be provided to the appropriate authority (U.S. EPA Region VI or DEQ, if granted delegation) [63.9(a)(4)(ii)] according to 40 CFR 63.9(b)(2). At such time, an update of the streamlining analysis referenced under Section H, Subpart 2.1.d.3 shall be submitted by the permittee along with a schedule for meeting any requirements revised from the original streamlining analysis. If the streamlining analysis identified above requires updating, DEQ shall incorporate such changes into this permit by use of a Minor Permit Modification under OAC 252:100-8. [40 CFR 63.9(b)(2), 63.9(b)(1)(i), 63.9(d), 63.6(b)(3), 63.6(b)(4)]

Emissions Calculation

Not Applicable

Pollutant Control Technique

Not Applicable
