Imation Enterprises Corp., Weatherford Plant
Title V Permit

Prepared by:

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EPA Region VI
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Developed under the EPA Pollution Prevention Performance Partnership (P4) Program

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APPENDICES

ABBREVIATIONS & ACRONYMS

acfm	actual cubic feet per minute
AP-42	compilation of air pollutant emission factors
AQD	Air Quality Division of Oklahoma Department of Environmental Quality
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	continuous monitoring system
CO	carbon monoxide
DEQ	Department of Environmental Quality
DSD	Data Storage Division facility
EPA	Environmental Protection Agency
EU	emissions unit
EUG	emissions unit group
GEP	good engineering practice
HAP	hazardous air pollutant
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MEK	methyl ethyl ketone
MMBTUH	million British Thermal Units per hour
$MMft^3$ (MMCF)	million cubic feet
MOU	Memorandum of Understanding
MVAC	motor vehicle air conditioner
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOx	oxides of nitrogen
NSPS	New Source Performance Standards
NSR	New Source Review
OAC	Oklahoma Administrative Code
OAQPS	Office of Air Quality Planning and Standards (EPA)
P2	pollution prevention
PM_{10}	particulate matter less than 10 microns in size
PPH	pounds per hour
ppmv	parts per million by volume
PPSD	Printing & Publishing Systems Division facility
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RCRA	Resource Conservation and Recovery Act
SO_2	sulfur dioxide
SRU	solvent recovery unit
SVE	soil vapor extraction
TPM	total particulate matter
TPY	tons per year
VOC	volatile organic compound
$\mu g/m^3$	micrograms per cubic meter

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **June 9, 1998**

TO: W. Ray Bishop, Acting Director, Permits and Compliance Section

THROUGH: Peer Review

FROM: Dawson Lasseter, P.E., Supervisor, Existing Source Permits Unit

SUBJECT: Evaluation of Permit Application No. **97-380-TV**
Imation Enterprises, Corp.
Printing & Publishing and Data Storage Facilities
2000 E. Frontage Rd.
NW/4, Section 10, T12N, R14W
Weatherford, Custer County, Oklahoma

SECTION I. FACILITY DESCRIPTION

The Weatherford facility is operating subject to the Air Quality Division permits as listed below:

Operation	SIC Code	Active Permits
Printing & Publishing	3861	79-029-O(M-2), 91-069-O(M-1), 92-088-O
Magnetic Tape Facility	3695	85-060-O(M-1), 91-005-O, 95-363-O
Six storage vessels		91-159-O
South SVE Unit		93-049-O(M-1)
North SVE Unit		96-514-O

The printing and publishing facility manufactures products which are used in the printing and publishing industry by coating thin films with solvent-borne solids. No printing or publishing is conducted at the facility

The magnetic tape facility manufactures magnetic tape in a web coating process. Metal oxides (magnetic particles) are mixed with binders and solvents prior to application on plastic tape. The tape is then passed through an indirect steam heated drying oven for solvent removal.

The seven organic materials storage vessels are used to store organic solvents, gasoline, diesel, and No. 2 fuel oil.

Both soil vapor extraction (SVE) systems are used to treat contaminated soils at the prior location of raw materials storage tanks.

SECTION II. EQUIPMENT

Emission Unit	Emission Point	Description	Control Device
EUG 1			
1	001-C&D	West Solution Prep. Rm. (Chlorinated)	none required
2	001-A&B	East Solution Prep. Rm. (Non-chlorinated)	closed covering system
EUG 2			
3	001-BB	15W Pump Rm.	none required
4	024-111	15W Coater	catalytic oxidizer
EUG 3			
5	001-S	12W Pump Rm.	none required
6	023-JJJ	12W Coater	solvent recovery unit (not req.)
EUG 4			
7	insignificant	Emulsion Coating and Making Area	Emission unit removed from service
EUG 5			
8	025-KKK	DSD 51 Coater	thermal oxidizer
EUG 6			
9		#1 Boiler (30.4 MMBTUH) serial # 14625-1	None
9		#2 Boiler (30.4 MMBTUH) serial # 14625-2	None
10		Storage Tanks	see table below

Storage Tank Data

Tank No.	Cap. (gals)	Contents	Dia. (ft.)	Ht/Lgth (ft.)	V P (psia)	Inst. Date	Control
T-1	4,300	RCRA Solvent (PPS-SRU)	5.9	37.25	0.370	after 1990	SRU
T-2	10,000	1,1,2 TCA	9	20	0.007	1990	SRU
T-3	2/7500	MEK	9	30	1.500	1990	SRU
T-4	100,000	No. 2 Diesel	30	25	0.008	1974	None
T-5a	325	Gasoline	3.5	3.9	3.86	1987	None
T-5b	325	No. 2 Diesel	3.5	3.9	0.008	1987	None

Stack Parameters

Parameter	PPSD Catalytic Oxidizer	DSD Thermal Oxidizer
Height (ft)	50	30
Diameter (ft)	5	3.5
Flow Rate (acfm)	36,600	30,000
Exit Temperature (^{o}F)	650	700

SECTION III. EMISSIONS AND ALTERNATIVE OPERATING SCENARIOS

Emissions estimates reflect operating hours, fuel types, maximum throughput capabilities, capture efficiencies, control device efficiencies, and AP-42 (1/95) Tables 1.3-1 and 1.4-1,2,3. The two boilers each have a maximum rated heat input capacity of 30.4 MMBTUH. Scenario 1 uses natural gas as the fuel for the two boilers and Scenario 2 assumes diesel as the fuel for the two boilers. Scenario 3 shows emissions from the preapproved addition of materials or equipment and using natural gas or diesel as fuel.

The facility will operate under a VOC emissions cap of 249 TPY in order to avoid major PSD status. The other criteria pollutant emissions will be limited based on the Scenario used by the facility.

Scenario 1 - Emissions Estimates

		PM_{10}		SO_2		NOx		CO		VOC		
EU	Description	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	Limit
1	West Sol. Prep. Rm.	-	-	-	-	-	-	-	-	<15	<60	PTE
2	East Sol. Prep. Rm.	-	-	-	-	-	-	-	-	0.15	0.66	permit
3	15W Pump Rm.	-	-	-	-	-	-	-	-	<7	<5	
4	15W Coater	-	-	-	-	-	-	-	-	135	500	PTE
5	12W Pump Rm.	-	-	-	-	-	-	-	-	<4	<18	
6	12W Coater	-	-	-	-	-	-	-	-	812	3556	PTE
7	Insignificant Sources	-	-	-	-	-	-	-	-	-	-	
8	DSD Ther. Oxidizer	-	-	-	-	2.31	10.12	7.02	30.75	15.7	66.44	permit
P1	PPSD Cat. Oxidizer	0.25	1.10	6.50	28.47	2.54	11.13	0.64	2.80	31.80	100	permit
9	2 Boilers	0.84	3.64	0.04	0.16	8.52	37.28	2.12	9.32	0.18	0.74	PTE
10	Storage Tanks											
	T-1 4,300 gal (RCRA)	-	-	-	-	-	-	-	-	-	0.09	permit
	T-2 10,000 gal (1,1,2)	-	-	-	-	-	-	-	-	-	0.15	permit
	T-3 2/7500 gal (MEK)	-	-	-	-	-	-	-	-	-	0.32	permit
	T-4 100,000 gal(#2 D)	-	-	-	-	-	-	-	-	-	0.08	permit
	T-5a 325 gal (gas)	-	-	-	-	-	-	-	-	-	0.03	permit
	T-5b 325 gal (diesel)	-	-	-	-	-	-	-	-	-	<0.01	permit

Scenario 2 - Emissions Estimates

All units emissions are the same as Scenario 1 except the 2 boilers

		PM_{10}		SO_2		NOx		CO		VOC		
EU	Description	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	Limit
9	2 Boilers	0.88	3.88	25.22	110.5	8.88	38.90	2.22	9.72	0.08	0.38	PTE

Scenario 3 – Alternative Operating Scenarios
Emission Estimates

(Based on Natural Gas or No. 2 Diesel (0.15% by wt. Sulfur) as fuel, 8760 hrs/yr Operation, and 100 MMBTUH Cap. Boiler)

	PM_{10}		SO_2		NOx		CO		VOC	
Description	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY
1 Boiler (uncontrolled) or;	1.38	6.04	0.06	0.26	14.00	61.32	3.50	15.33	Subject To VOC CAP	
1 Boiler (low NOx)	1.38	6.04	0.06	0.26	8.10	35.48	6.10	26.72	Subject To VOC CAP	
Storage Tanks(>10,567 gals. cap.)	-	-	-	-	-	-	-	-	Subject To VOC CAP	
I Boiler (No. 2 Diesel as Fuel)	1.46	6.39	15.55	68.11	14.60	63.95	3.65	15.99	Subject To VOC CAP	

Toxic Compounds - All Operating Scenarios

Toxic	**CAS Number**	**Category**	**MAAC µg/m³**	**Title III HAP**
1,1,2 TCA	79-00-5	A	545	Yes
acrylonitrile	107-13-1	A	21	Yes
cobalt compounds	7440-48-4	A	0.5	Yes
ethyl acrylate	140-88-5	A	200	Yes
ethyl alcohol	64-17-5	B	38,000	No
glycol ethers	110-80-5	B	36	Yes
methyl methacrylate	80-62-6	B	8,200	Yes
triethylamine	121-44-8	B	800	Yes
ethyl benzene	100-41-4	C	43,427	Yes
ethylene glycol	107-21-1	C	12,695	Yes
glycol ethers	108-65-6	C	36,000	No
glycol ethers	111-90-0	C	274	Yes
glycol ethers	70657-70-4	C	11,000	No
hydrogen chloride	7647-01-0	C	700	Yes
methyl alcohol	67-65-1	C	26,216	Yes
methyl ethyl ketone	78-93-3	C	59,000	Yes
methyl isobutyl ketone	108-10-1	C	20,486	Yes
toluene	108-88-3	C	37,668	Yes
xylene	1330-20-7	C	43,427	Yes
cyclohexanone	108-94-1	C	10.036	No
tetrahydrofuran	109-99-9	C	58,993	No
isopropyl alcohol	67-63-0	C	98,339	No

SECTION IV. BEST AVAILABLE CONTROL TECHNOLOGY

Compliance with NSR and OAC 252:100-41 requirements for Best Available Control Technology (BACT) is accomplished through permit Section H, Subsection 5, Specific Condition No. 1. This specific condition makes it a requirement in the event of 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.

BACT includes the following:

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

2. 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 control efficiency of at least 95% for the unit.

3. Emissions from the use of any Air Quality Division Category A toxic not listed in Specific Condition No. 1 shall be routed through a thermal oxidizer, catalytic oxidizer, or equivalent device that shall maintain a control efficiency of at least 95% for the unit.

4. At such time as a Maximum Achievable Control Technology (MACT) rule becomes effective for 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).

During the term of the permit, the BACT determination provided under Section H, Subsection 4, Specific Condition No. 1 is required to be reviewed by the permittee (with the pollution prevention program review) every eighteen (18) months following the date of the permit.

SECTION V. POLLUTION PREVENTION

Pollution prevention (P2) is defined as the use of materials, processes, or practices that reduce or eliminate the creation of pollutants or wastes at the source. P2 includes practices that reduce the use of energy, water, or other resources, and practices that protect natural resources through conservation or more efficient use.

To be a useful tool, P2 must be a method of operation that incorporates elements of change, measurement, flexibility, and linkage with permit conditions. Therefore, the document that outlines the facility P2 program, including but not limited to corporate commitment, performance goals, and performance measurement, will be separate from the Air Quality Permit, will be maintained on the facility site, and will be made available to regulatory personnel upon request.

An Executive Summary of the P2 Program will be prepared by the permittee and maintained on site and at the Air Quality headquarters office in Oklahoma City for review by the public. The Executive Summary will outline the program parameters and reflect the results of the semi-annual leadership reviews that are required by Section G, Specific Condition No. 1 of the permit.

SECTION VI. AIR QUALITY IMPACTS

For an area which will be affected by emissions from a new source or modification, an analysis of the existing air quality is required for those pollutants which will be emitted in significant quantities. This permit allows the emission of VOCs and SO_2 at rates above major source definition levels. The owner or operator must demonstrate that the emissions will not cause nor contribute to a violation of the National Ambient Air Quality Standards (NAAQS).

The facility is located 70 miles west of Oklahoma City, Oklahoma at an elevation of about 1670 feet above sea level in an area characterized by gently rolling hilly terrain. The discharge stacks for the emission points are less than the Good Engineering Practice (GEP) height, thus building downwash effects will cause ambient impacts to be higher and to occur close to the stack.

VOC is not limited directly by NAAQS. Rather, it is regulated as an ozone precursor. EPA developed a method for predicting ozone concentrations based on VOC and NOx concentrations in areas of VOC dominated air. The ambient impacts analysis utilized the tables from VOC/NOx Point Source Screening Tables (Richard Scheffe, OAQPS, September, 1988). The added impact was determined to be 142.77 $\mu g/m^3$ (0.1285 ppm) based on 249 TPY of VOC and a maximum hourly emission rate of 836 PPH. The added impacts were added to concentrations shown at the nearest monitoring site, Oklahoma City. The following table lists the maximum results for the source and the background concentrations. As may be seen from the table, maximum ambient impacts at the permitted level are below the NAAQS. Modeled maximum VOC emissions from the facility that will maintain compliance with the NAAQS for ozone are 836 PPH.

Compliance with NAAQS

Parameter	Ozone 1-hr avg. $\mu g/m^3$	SO_2 24-hr avg. $\mu g/m^3$
Maximum Impact	142.77	86.50
Background Concentration	58.24	13.30
Total Concentration	**201.01**	**99.80**

The nearest Class I area to this facility is the Wichita Mountains Wildlife Refuge near Lawton, Oklahoma, 80 miles to the south. The protracted transport distance and downwind direction of the facility to the prevailing winds precludes any significant impact on Class I areas.

SECTION VII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified in the application and duplicated below were confirmed by the initial operating permit inspection. Records were available to confirm the insignificance of the activities. Appropriate recordkeeping on activities indicated below with " * ", are specified in the Specific Conditions. The facility uses analysis/laboratory equipment that emits below de minimis levels, a hazardous waste and hazardous materials drum staging area, exhaust systems for storage rooms or cabinets, and groundwater remediation wells, including venting, pumping, and collecting activities, that emit below de minimis limits for air toxics, none of which require recordkeeping to confirm insignificance.

Records are required to confirm insignificance of the following: Usage of two welding stations, two 180-gallon diesel tanks, two 250 gallon gasoline tanks, and infrequent test firing of boilers with fuel oil to keep the burners in working condition.

Analysis/laboratory activities.

Hazardous waste and hazardous materials drum staging areas.

Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas.

Groundwater remediation wells, including but not limited to venting, pumping, and collecting activities, subject to de minimis limits for air toxics.

* Welding and soldering operations utilizing less than 100 lbs of solder and 53 tons per year of electrodes.

* Storage tanks with less than 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal 1.0 psia at maximum storage temperature (diesel 0.02 psia).

* Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30 day period.

* Periodic test-firing of a boiler with fuel oil for purposes of maintaining a burner in working condition and completed within 3 days.

SECTION VIII. FEDERAL REGULATIONS

PSD (Prevention of Significant Deterioration) 40 CFR Part 52 [Not Applicable]
Final total emissions for each plant are less than the threshold of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS (New Source Performance Standards) 40 CFR Part 60 [Applicable]
Subpart Dc provides standards of performance for small industrial-commercial institutional steam generating units that have a maximum design heat input capacity of 100 MMBTUH or less, but greater than 10 MMBTUH. There are two affected boilers at this facility and pre-approval to add one applicable boiler is contained in the permit conditions.
Subpart SSS affects magnetic tape coating facilities that commenced construction, modification, or reconstruction after January 22, 1986. Affected facilities are each coating operation (coating applicator, flashoff areas, and drying ovens) and the coating mix preparation equipment (defined as mills, mixers, holding tanks, polishing tanks, and other VOC emissions sources but does not include mills which do not emit VOC because they are sealed and operated under pressure). Applicable standards of Subpart SSS depend on whether a coating operation is new or reconstructed/modified, whether the operation is conducted inside a "total enclosure" as defined by the Subpart, whether the VOC emissions control device receives emissions from only affected facilities or both affected and non-affected facilities, and whether a vapor recovery unit has one stack per adsorption vessel or if a single stack serves multiple adsorption vessels. Applicable standards for the modification of the coating line are those standards for modified coating operations conducted in a total enclosure, with a dedicated air pollution control device, and whose air pollution control device has a single discharge stack. 3M, predecessor to Imation Enterprises Corp., demonstrated through testing on August 1, 1996, (for Permit No. 95-363-O) a control efficiency of the thermal oxidizer of 97%, and through an AQD inspection on the same date, demonstrated that the coating operation is totally enclosed. The permittee is required to maintain the lesser of the demonstrated control efficiency or 93%. The Specific Condition, Section B requirement to maintain a 95% control device efficiency is more stringent than the requirements of Subpart SSS. The initial performance test of EUG-5 performed under 40 CFR 60 Subpart SSS meets all applicable requirements and is acceptable as compliance with the provisions of 40 CFR 63.7 and 40 CFR 63 Subpart EE, including 63.705(e)(2), 63.705(e)(3), 63.9(e), and/or 63.705(f). The initial compliance demonstration under 40 CFR 63.705(d) for the hard piping of the vent from the MEK storage tank to the solvent recovery unit is waived on the

basis of an alternative demonstration that has been performed to the satisfaction of DEQ and on the basis of 40 CFR 63.7(e)(2)(iv).

Subparts K, Ka, and Kb apply to volatile organic storage vessels. Subpart K applies to storage tanks, including those containing finished and intermediate petroleum products not specifically exempted (fuel oils No. 2 through No. 6), gas turbine fuels No. 2-GT through No. 4-GT, and diesel fuel oils No. 2-D through No. 4-D with a capacity greater than 65,000 gallons, which were constructed or modified between June 11, 1973 and May 19, 1978. Tank T4 (No. 2 fuel oil) was constructed during the time that Subpart K was in effect (1974), however Subpart K specifically exempted vessels storing No. 2 fuel oil.

Subpart Ka applies to storage vessels constructed or modified after May 19, 1978, but prior to July 23, 1984, which have a capacity of 40,000 gallons or more, or those vessels used prior to custody transfer which have a capacity of 420,000 gallons or more. There are no affected tanks.

Subpart Kb applies to storage vessels constructed or modified after July 23, 1984, with a capacity of 10,567 gallons or more. Tanks T1, T2, T5a, and T5b are all smaller than the de minimis level for Subpart Kb, 10,567 gallons. Tank T3 is a horizontal master tank that is divided into different compartments to form two separate tanks of 7500 gallons capacity each. Therefore, this Subpart does not apply. Pre-approval to add VOL tanks under this subpart is contained in the permit conditions. When such tanks are added, this subpart will apply.

NESHAP (National Emission Standards for HAPs) 40 CFR Part 61 [Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride.

NESHAP (National Emission Standards for HAPs) 40 CFR Part 63 [Applicable]

Section 112(g) Hazardous Air Pollutants; Regulations for Construction or Reconstruction of Major Sources is applicable. After March 6, 1996 (the effective date of the Oklahoma program under Title V) no person may construct or reconstruct any major sources of hazardous air pollutants, unless the maximum achievable control technology (MACT) emissions limitations for existing or new sources is met. Such determination shall be made on a case-by-case basis where no applicable emission limitations have been established by the Administrator. The Diskette Storage facility is subject to Subpart EE and has installed MACT. 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 #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.

Subpart EE sets emission standards for the magnetic tape manufacturing industry. The thermal oxidizer for the DSD Coater (including solvent storage tanks, mix equipment, the coating operation, condenser vents in solvent recovery, and waste handling devices) has a control efficiency greater than the required 95% and was installed in order to achieve compliance with this Subpart.

Subpart Q sets standards of emissions for hazardous air pollutants for industrial process cooling towers. There are no requirements for this facility because there are no chrome-based compounds used.

CAM (Compliance Assurance Monitoring) 40 CFR Part 64 [Not Applicable]
As published in the Federal Register on October 22, 1997, CAM applies to any pollutant specific emission unit at a major source that is required to obtain a Title V permit, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY

The rule exempts units subject to NSPS and NESHAP rules that are proposed after the 1990 amendments to the Act from CAM requirements. Therefore, the Magnetic Tape facility, which is in compliance with NESHAP 40 CFR 63, Subpart EE, is exempt from 40 CFR 64. The Printing and Publishing facility has installed control equipment that is subject to CAM. Specifically, the 15W line (EUG 2) uses a thermal oxidizer and/or a catalytic afterburner to incinerate non-chlorinated solvent emissions and a carbon adsorption unit to control emissions from chlorinated solvents. The East Solution Prep Room (EUG 1) uses a closed covering system with additive ports which reduce emissions by 99.7%. The old 12W line (EUG 3) and Tanks T-1, T-2, and T-3 emissions are controlled by a solvent recovery unit (carbon adsorption). Therefore these units are subject to CAM which is provided by the automated computer controlled emissions and temperature record keeping that is used for the catalytic oxidizer and the mass balance records continually kept for the carbon adsorption unit as listed in Specific Conditions, Section B, Nos. 5, 6, 7, 8, 9, and Section C, Nos. 1, 3, 4, and 5.

Accidental Release Prevention, 40 CFR Part 68 [Not Applicable]
Toxics subject to this regulation that are present at the facility include acrylonitrile (CAS No. 107131) and hydrochloric acid (CAS No. 7647010). These substances are not stored on site in quantities greater than the threshold quantities of 20,000 lbs. and 15,000 lbs., respectively. Therefore, Part 68 is not applicable.

Stratospheric Ozone Protection, 40 CFR Part 82 [Applicable]
This facility does not produce, consume, recycle, import, or export any controlled substances or controlled products as defined in this Part. Nor does this facility perform service on motor (fleet)

vehicles which involves ozone-depleting substances. Therefore, as presently operated, this facility is not subject to these requirements. To the extent that the facility has air-conditioning units that apply, the permit requires compliance with Part 82.

SECTION IX. OKLAHOMA AIR QUALITY RULES

OAC 252:100-1 (General Provisions) [Applicable]
This Subchapter includes definitions that apply but there are no regulatory requirements.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules (OAC 252:100). Compliance with all applicable requirements has been demonstrated in Section III.

OAC 252:100-5 (Registration of Air Contaminant Sources) [Applicable]
Annually required information (Turn-Around Document) has been provided and shall be provided as required by Air Quality.

OAC 252:100-6 (Permitting) [Applicable]
This Subchapter sets forth procedural requirements that apply to Air Quality permits and other authorizations including licenses, certifications, registrations, and plan approvals.

OAC 252:100-7 (Permits) [Applicable]
The facility is classified as major for Part 70 purposes and will accept limitations to keep the facility below PSD major status.
OAC 252:100-7-2(a), Permitting systems refers to OAC 252:100-6-31(b), Construction Permit, which states that for major and minor sources a construction permit is issued upon determination by the DEQ that the source is so designed as to assure that the emission limitations of the several control rules will be met and the applicant demonstrates to the satisfaction of the DEQ that the source has complied with all pertinent requirements and conforms to the general intent of applicable laws and rules.
Under OAC 252:100-6-31(b)(2), construction permits for Part 70 sources, reference Subchapters 7 and 8.
Under OAC 252:100-7-15, Construction Permit, (1) Construction permit required states, "No person shall cause or allow the construction or modification of any minor or major source without first obtaining a DEQ-issued air quality construction permit to construct or modify the source." (2) Permit requirements states, "The construction permit shall require the permittee to comply with all applicable air pollution rules, federal new source performance standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPS) established in Sections 111 and 112 of the Federal Clean Air Act, and to not exceed ambient air quality standards." The pre-approved operating scenarios that require construction or modification have been described in the permit, have emission limitations that will not exceed ambient air quality standards, and are

required to comply with all applicable requirements. Section H of the Specific Conditions fulfills all the construction permit requirements and the requirements under the current Air Quality rules.

OAC 252:100-8 (Operating Permits (Part 70)) [Applicable]
The facility meets the definition of a major source since it has emissions limitations in excess of 100 TPY of a criteria pollutant. As such, a Part 70 (Title V) operating permit is required.

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OAC 252:100-8-5(a) Construction Permit states, "Any new source or modified source which becomes subject to this Subchapter shall be required to obtain a construction permit in accordance with OAC 252:100-7 prior to commencement of construction. OAC 252:100-7 is explained above.
OAC 252:100-8-6(a)(10) Operating scenarios states, "The permit shall include terms and conditions applicable to all operating scenarios described in the permit application and eligible for approval under applicable requirements, and state-only requirements. The permit shall authorize the permittee to make changes among operating scenarios authorized in the permit without notice, but shall require the permittee contemporaneously with making a change from one operating scenario to another to record in a log at the permitted facility the scenario under which it is operating."
These requirements and those proposed in the Air Quality rules amendments of October 1997 are satisfied in the specific conditions of the permit.

OAC 252:100-9 (Excess Emission and Malfunction Reporting Requirements) [Applicable]
All excess emissions shall be reported as provided in this chapter. In the event of a malfunction of air pollution control or process equipment, the owner or operator of such facility shall notify the Air Quality Division as soon as practical during normal office hours and no later than the next working day following the malfunction or release. Within ten (10) business days further notice shall be tendered in writing.

OAC 252:100-19 (Particulate Matter from Fuel-Burning Equipment) [Applicable]
This Subchapter limits fuel-burning particulate emissions to 0.6 lb/MMBTU. AP-42, Table 1.4-2 (3/98) lists natural gas TPM emissions to be 7.6 lb/MMft^3 or about 0.0076 lb/MMBTU which is in compliance. For diesel fuel, AP-42, Table 3.4-5 (1/95) lists TPM emissions of 0.0697 lb/MMBTU which is also in compliance.

OAC 252:100-25 (Smoke, Visible Emissions, and Particulate Matter) [Applicable]
This Subchapter states that no person shall cause, suffer, allow, or permit discharge of any fumes, aerosol, mist, gas, smoke, vapor, particulate matter, or any combination thereof, of a shade or density greater than twenty percent equivalent opacity except for short term occurrences. The facility will be required to comply with this Subchapter.

OAC 252:100-29 (Fugitive Dust) [Applicable]

No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or to interfere with the maintenance of air quality standards. Since there is minimal vehicle traffic and no dust producing processes, this facility will not cause a problem in this area and it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]

The two boilers are subject to this Subchapter as "existing equipment" and the thermal oxidizers hapter limits SO_2 emissions to 0.2 lb/MMBTU for gas fuel, and 0.8 lb/MMBTU for liquid fuel. Pipeline grade natural gas has SO_2 emissions of 0.0006 lb/MMBTU while diesel fuel has SO_2 emissions of 0.57 lb/MMBTU. The fuel-burning equipment are in compliance with this Subchapter.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]

The boilers were installed prior to the promulgation date of February 15, 1972 and each boiler has a maximum rated heat capacity of 30.4 MMBTUH which is below the 50 MMBTUH threshold. OAC 252:100-1-3 defines "fuel-burning equipment" as "any one or more of boilers, furnaces, gas turbines or other combustion devices and all appurtenances thereto used to convert fuel or waste to usable heat or power." The thermal oxidizers or catalytic oxidizers create no usable heat or power, therefore, this Subchapter does not apply to existing equipment. The natural gas and the diesel used as fuel for the pre-approved boiler will have emissions of 0.14 lb/MMBTU and are in compliance with this subchapter.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]

None of the following affected processes are located at this facility: foundry cupola, blast furnace, basic oxygen furnace, catalytic cracking unit.

OAC 252:100-37 (Organic Compounds) [Applicable]

Part 3 requires storage tanks with capacities of 400 gallons or more to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. Diesel fuel has a vapor pressure that is below the exemption level of 1.5 psia and those tanks are, therefore, exempt. Emissions from tanks T-1, T-2, and T-3 are routed through the SRU for vapor recovery.

OAC 252:100-37-18 requires that any rotating pump or compressor handling organic material compounds be equipped with mechanical seals or other equipment of equal efficiency; or reciprocating type pumps and compressors be equipped with packing glands properly installed and in good working order.

Part 5 allows organic solvent emissions in excess of the standards in OAC 252:100-37-25 (a) through (d) as long as the following conditions are met:

1. emissions that would result in the absence of control are reduced by:

    a. 90 percent, by incineration; or
    b. 85 percent, by absorption or any other process of equivalent reliability and effectiveness; and,

2. no air pollution, as defined by the Clean Air Act, results.

Emissions of organic materials to the atmosphere from the clean-up with organic solvents, as defined in OAC 252:100-37-2, of any article, machine, equipment or other contrivance used in applying coatings controlled in OAC 252:100-37-25 (a) through (d) shall be included with the other emissions of organic solvents from the coating line or operation in determining compliance with these rules.

Part 7 requires fuel-burning equipment to be operated and maintained so as to minimize emissions. Temperature and available air must be sufficient to provide essentially complete combustion.

This Subchapter also subjects any new or modified source of organic material emitted either as a solvent or a reactant to requirements of permits and BACT. There is no more effective VOC control than thermal oxidizers which, therefore, achieve compliance with the BACT requirements.

OAC 252:100-41 (Toxics) [Applicable **State only**]
This Subchapter requires BACT on new emissions of any Category A toxic source that exceeds the de minimis level, and requires a demonstration of compliance with the MAAC for all air toxics emissions that exceed the de minimis levels. The following toxics may exceed the de minimis levels and were modeled using the SCREEN3 software to determine MAAC compliance. Most toxics do not exceed the individual MAAC even when they are emitted from only one of the thermal oxidizer/catalytic oxidizer stacks and at rates exceeding the hourly average for a 249 TPY source operating 8760 hours per year (56.85 PPH). The maximum hourly emission rate of each toxic allowed from a single stack has been calculated and listed in the table below. Actual emissions will be in compliance for all toxics.

Future new toxics not listed below will be classified by Air Quality, if necessary, and stack tested or modeled by the permittee using the modeling protocol in the specific conditions of the permit to confirm compliance with the appropriate MAAC.

Ambient Air Impacts
(Assumes all emissions from one stack and shows maximum emissions allowed with MAAC compliance)

Toxic	CAS No.	Category	Title III HAP	MAAC µg/m^3	Maximum Allowed PPH
1,1,2 trichloroethane	79-00-5	A	yes	545	54.00
ethyl acrylate	140-88-5	A	yes	200	20.00
acrylonitrile	107-13-1	A	yes	20	2.00
cobalt compounds	7440-48-4	A	yes	0.5	0.05
ethyl alcohol	64-17-5	B	no	38,000	3800.00
glycol ethers	110-80-5	B	yes	36	3.50
methyl methacrylate	80-62-6	B	yes	8,200	820.00
trimethylamine	121-44-8	B	yes	800	80.00
ethyl benzene	100-41-4	C	yes	43,427	4350.00
glycol ethers	108-65-6	C	no	36,000	3500.00
glycol ethers	111-90-0	C	yes	274	27.00
glycol ethers	70657-70-4	C	no	11,000	1100.00
hydrochloric acid	7647-01-0	C	yes	700	70.00
methyl alcohol	67-56-1	C	yes	26,216	2625.00
methyl ethyl ketone	78-93-3	C	yes	59,000	5900.00
methyl isobutyl ketone	108-10-1	C	yes	20,486	2050.00
toluene	108-88-3	C	yes	37,668	3760.00
xylene	1330-20-7	C	yes	43,427	4350.00
ethyl glycol	107-21-1	C	yes	12,695	1269.00
cyclohexanone	108-94-1	C	no	10,036	1004.00
tetrahydrofuran	109-99-9	C	no	58,993	5899.00
isopropyl alcohol	64-17-5	C	no	38,000	3800.00

OAC 252:100-43 (Sampling and Testing Methods) [Applicable]
All tests shall be made and the results calculated in accordance with test procedures described or referenced in the permit and approved by Air Quality. All tests shall be made under the direction of a person qualified by training and/or experience in the field of air pollution control.

OAC 252:100-45 (Monitoring of Emissions) [Applicable]
Records and reports as Air Quality shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted as specified in the permit.

The Following Oklahoma Air Quality Rules are not applicable to this facility:

Rule	Title	Remarks
OAC 252:100-11	Alternative Reduction	not requested
OAC 252:100-13	Open Burning	not practiced
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-21	Wood-Waste Burning	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Feed and Grain Facility	not type of emission unit
OAC 252:100-27	Process Particulates	not in source category
OAC 252:100-35	Carbon Monoxide	not type of emission unit
OAC 252:100-39	Nonattainment Areas	not in source category

SECTION X. COMPLIANCE AND INSPECTION

Enforceable Schedule of Compliance

Sequence of Actions:
The facility is presently in compliance with all applicable rules and regulations.

Inspection:
An operating inspection was conducted on August 5, 1997. The inspection was conducted by Mr. Jeff Dye of Air Quality who was accompanied by Mr. Norbert Hoffman of Imation Enterprises Corp. The facility was found to be operating according to the application specifications.

Testing:
No additional testing is required prior to the approval of this permit.

Recordkeeping and Reporting in the Permit Specific Conditions

Section	Subsection	Specific Condition	Description
Existing Equipment			
D		1 - 7	Testing Requirements
E		1 - 13	Recordkeeping Requirements
F		1 - 11	Reporting Requirements
G		1	Recordkeeping
Pre-Approved Activities			
H	4	1 - 6	BACT and Compliance and Performance Testing
H	5	1 - 13	Recordkeeping for Pre-Approved Scenarios

SECTION XI. TIER CLASSIFICATION AND PUBLIC REVIEW

This application has been classified as **Tier II** based on the request for an operating permit for an existing major source for which a Part 70 (Title V) operating permit is required. Information on

all permit actions is available for review by the public in the "ODEQ Weekly Permit Status

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the real property.

The applicant published a "Notice of Filing" of a Tier II application in the *Weatherford Daily News,* a daily newspaper, in Custer County, on November 22, 1996. The notice outlined the P4 Program and its relationship to Title V of the Clean Air Act. The permit was projected to provide maximum operating flexibility allowed under current regulations and to incorporate direct incentives for performing pollution prevention. This facility is not within 50 miles of the border of Oklahoma. For this Tier II application an opportunity for public review of the draft permit was provided by publication of a notice in the *Weatherford Daily News* newspaper on March 29, 1998.

A copy was also provided to EPA Region 6 for review. Ten comments on the draft permit were received from EPA Region 6 during the comment period and are addressed in Section XIII below.

SECTION XII. FEES PAID

Initial Title V operating permit fee of $2000.

SECTION XIII. COMMENTS AND RESOLUTION

The following un-edited comments were received from EPA Region 6 in a letter dated May 1, 1998, and are numbered as found in the letter. DEQ responses, as supported by the applicant, follow each item.

Item 1 Low level citation: Section II (Subsection 2) 1c of the specific conditions contain 40 CFR 60 Subpart Dc requirements for boilers. As required by "White Paper 2 for Improved Implementation of the Part 70 Operating Permit Program" citations can be used in permits. However, emission limits must be listed for all applicable emission units. The permit must list the specific SO_2 and particulate standard. Also Section H 1c (ii) of the specific conditions states the use of pipeline grade natural gas as fuel will constitute compliance with the standards for SO_2 and particulate matter. This language is applicable when firing natural gas but the permit is not clear what the sources obligations are when firing diesel (operating scenario 2 &3) fuel. The permit should provide lower level of citations and list the emission limits under 40 CFR 60 Subpart Dc.

Response to Item 1: Emission limits for all preapproved alternative operating scenarios are listed in the specific conditions Section H, Specific Condition No. 2. The specific SO_2 and particulate matter standards required by 40 CFR 60 Subpart Dc have been added to the specific conditions in Section H, Specific Condition No. 1c(i). Acceptable sulfur content limit of diesel fuel has been included in Section H, Specific Condition No. 1c (ii).

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Item 2 Low level citations: Section H (Subsection 4) 3 of the specific conditions address tank requirements for preapproved activities. This section references 60.113b(a) for external floating roof. The correct is not 60.113b(a) but instead 60.113b(b). The correct citation for closed vent system with control device is not 60.113b(a) but instead 60.114b(c).

Response to Item 2: Agreed. The citations have been corrected.

Item 3 Memorandum of Understanding (MOU): Section III "Review and Report" 2. establishes factors that may be used by ODEQ in determining the acceptability of the P2 Program. This section states "Documentation showing efforts to prevent air emission by….." Region 6believes air emissions refer to volatile organic compound (VOC) emissions as opposed to total air emissions. The MOU should be clear as to what emission will be reduced.

Response to Item 3: Agreed. The term VOC has been added. The sentence now reads "….to prevent VOC air emissions…."

Item 4 Enforceable Conditions: Section B, Specific Condition 8 and 10 address the mass balance calculations for VOC. As stated this calculation shall be conducted daily. The permit should add a requirement for an hourly mass balance calculation upon the request of the State or EPA to verify compliance with the 836 pph limit.

Response to Item 4: Agreed. This requirement has been added to Section E, Specific Condition No. 3(g).

Item 5 Compliance Demonstration: Section B, Specific Condition 6 of the permit addresses sulfur requirements. The permit should require fuel records to be kept to demonstrate compliance with the 1) 159 ppm sulfur requirement or 2) 0.5 percent by weight or less sulfur requirement.

Response to Item 5: Agreed. This requirement has been added to Section E, Specific Condition No. 2.

Item 6 Preapproved Alternative Scenarios: Subsection 4 specific condition has the wrong references to the NSPS for tanks. Storage tanks for external floating roof should be 60.113b(b) and for closed vent system with control device it should be 60.113b(c).

Response to Item 6: Agreed. The correction has been made.

Item 7 Preapproved Alternative Scenarios: The permit is not clear what the monitoring, recordkeeping, and reporting requirements are for tanks less than 75 m^3. Those tanks should comply with 60.116b(a) and (b).

Response to Item 7: Agreed. The requirement has been added to Section H, Subsection 5, Specific Condition No. 8.

Item 8 Preapproved Alternative Scenarios: The permit should require the source to notify ODEQ of the exact monitoring, record keeping and reporting requirements to be followed when a preapproved alternative scenario is implemented. These requirements should become part of a permanent log kept on site as required under 40 CFR 70.6(a)(9)(i).

Response to Item 8: Agreed. This requirement has been added to Section H, Subsection 5, Specific Condition No. 13.

Item 9 Best Available Control Technology Reviews: Section H, Subsection 4 discusses compliance and performance testing procedures. The permit contains a default dollar value for the average cost effectiveness (determining economic viability of control technology) of $2,500 per ton of emissions. We believe placing a limit on cost of control within the text of a permit is inappropriate. Setting a dollar per ton level above which control technologies will be deemed unviable over the life of the permit term does not take into account consideration the many economic factors which may change during the permit term. Such a limit is best left to each individual review or established as a matter of internal policy.

Response to Item 9: Agreed under normal circumstances. This facility is unique in that it already uses MACT standard control devices for affected sources and for sources that are not subject. A historical study of BACT analyses for facilities in Oklahoma shows that since 1993, $2000 per ton removed has been the limit separately established in each review above which a control alternative is deemed inappropriate. Section H, Subsection 4, Specific Condition No. 1 requires a cost effectiveness (economic impact) analysis that addresses the average and incremental cost effectiveness. This specific condition also requires the permittee to review the BACT determination provided under this condition and submit it to AQD with the pollution prevention leadership review. It applies to minor New Source Review and OAC 252:100-41 BACT requirements associated with the pre-approved operating scenarios.

Item 10 Typo: A typographical error in Section H (Subsection 1) specific condition 1 (b)(ii) exists. 40 CRR 60.112b should be 40 CFR 60.112b.

A typographical error in Section H of the specific condition 1 exists. The permit should reference 1 e) as opposed to 1 a) for EUG-5 related changes and/or new magnetic tape coating line.

Response to Item 10: Agreed. The typographical errors have been corrected.

SECTION XIV. SUMMARY

The applicant has demonstrated compliance with all applicable requirements. Ambient air quality standards are not threatened at this site. There are no active Compliance or Enforcement Air Quality issues concerning the facility. Approval of the permit is recommended.

PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Imation Enterprises, Corp.
Printing & Publishing and Data Storage Facilities **Permit No. 97-380-TV**

The permittee is authorized to operate in conformity with the specifications submitted to the Air Quality Division on April 7, 1997, with additional information submitted on November 20, 1997. The Evaluation Memorandum dated June 9, 1998, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to the conditions contained herein:

SECTION A Equipment and Emissions Limitations

1. Location of rules and regulations in the specific conditions. Quotation or paraphrasing of the rules and regulations in the specific conditions is not intended to alter their meaning from the original language as provided in the Code of Federal Regulations or the Oklahoma Administrative Code. In any case of a conflicting requirement between the Specific Conditions and the Standard Conditions of this permit, the Specific Conditions shall apply:

Reference Table

Rule/Regulation	**Section/Subsection(Specific Condition)**
NSPS	
General Provisions	H/2(1); 3(2); 4(3); 5(7)
40 CFR 60 Subpart Dc	H/2(1); 3(2); 4(3); 5(7)
40 CFR 60 Subpart Kb	H/2(1); 3(2); 4(3); 5(7)
40 CFR 60 Subpart SSS	B/(22)
NESHAP	
General Provisions	B/(21); C/(4 thru 6); E/(1, 6 thru 11); F/(2 thru 10); H/3/(3 thru 5); 4/(3, 5); 5/(7, 8, 12)
40 CFR 63 Subpart EE	B/(12 thru 22); C/(3 thru 9); D/(4 thru 9); E/(1,5 thru 11); F/(2 thru 10); H/2(1); 3(2 thru 5); 4(1,3 thru 5); 5(6 thru 11)
40 CFR 64	B/(5,6,7); C/(1)
State of Oklahoma	
OAC 252:100-3	A/(2)
OAC 252:100-7	A/(2); H/1/(2); 5/(6,7)
OAC 252:100-8	A/(2); B/(1,2,6,7); D/(1); E/(1,2,4,12); H/1/(1,2); 4/(2); 5/(5,6)
OAC 252:100-9	F/(1)
OAC 252:100-19	B/(4)
OAC 252:100-25	D/(1)
OAC 252:100-31	B/(4)
OAC 252:100-37	B/(3,8,9,11); H/2(1)
OAC 252:100-41	G/(1); H/2/(1); 4/(1); 5/(1 thru 4)
OAC 252:100-43	C/(1); D/(2,3); E/(1)
OAC 252:100-45	B/(5,10); C/(2,3); E/(3); H/3/(1); 5/(1)

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2. Points of emissions and emissions limitations for each point: [OAC 252:100-8-6(a)]

Emission Unit	Emission Point	Description	Control
EUG 1			
1	001-C&D	West Solution Prep. Rm. (Chlorinated)	
2	001-A&B	East Solution Prep. Rm. (Non-chlorinated)	Closed Covering System
EUG 2			
3	001-BB	15W Pump Rm.	none required
4	024-111	15W Coater	Catalytic Oxidizer
EUG 3			
5	001-S	12W Pump Rm.	Solvent Rec. Unit (not required)*
6	023-JJJ	12W Coater	Solvent Rec. Unit (not required)*
EUG 4			
7	insignificant	Emulsion Coating and Making Area	Removed from service
EUG-5			
8	025-KKK	DSD 51 Coater	Thermal Oxidizer
EUG 6			
9		#1 Boiler (30.4 MMBTUH) serial # 14625-1	none required
9		#2 Boiler (30.4 MMBTUH) serial # 14625-2	none required
10		Storage Tanks	See Table Below

*(not required) EUG 3 predates permitting requirements and the control device is not required.

Storage Tank Data

Tank No.	Cap. (gals)	Contents	Dia. (ft.)	Ht/Lgth (ft.)	Inst. Date	Control
T-1	4,300	RCRA Solvent (PPS-SRU)			after 1990	SRU
T-2	10,000	1,1,2 TCA	9	20	1990	SRU
T-3	15,000	MEK	9	30	1990	SRU
T-4	100,000	No. 2 Diesel	30	25	1974	none
T-5a	325	Gasoline	3.5	3.9	1987	none
T-5b	325	No. 2 Diesel	3.5	3.9	1987	none

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3. For the purposes of this permit, total usage of VOC containing materials during any consecutive 12-month period is limited to an amount which ensures that the plant-wide emissions (including any excess emissions and fugitive emissions) of volatile organic compounds shall not exceed 249 TPY (the CAP) and shall not exceed 836 PPH.

4. Emissions of criteria pollutants from specific eqiipment shall be limited as follows:

Scenario 1 Emissions Limit

		PM_{10}		SO_2		NOx		CO		VOC	
EU	Description	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY
1	West Sol. Prep. Rm.	-	-	-	-	-	-	-	-	Subject to CAP	
2	East Sol. Prep. Rm.	-	-	-	-	-	-	-	-	Subject to CAP	
3	15W Pump Rm.	-	-	-	-	-	-	-	-	Subject to CAP	
4	15W Coater	-	-	-	-	-	-	-	-	Subject to CAP	
5	12W Pump Rm.	-	-	-	-	-	-	-	-	Subject to CAP	
6	12W Coater	-	-	-	-	-	-	-	-	Subject to CAP	
8	DSD Ther. Oxidizer	-	-	-	-	2.31	10.12	7.02	30.75	Subject to CAP	
P1	PPSD Cat. Oxidizer	0.25	1.10	6.50	28.47	2.54	11.13	0.64	2.80	Subject to CAP	
10	Storage Tanks	-	-	-	-	-	-	-	-	Subject to CAP	

5. Plant wide emissions of the following substances shall not exceed the following rates (PPH):

Toxic Emissions

(Assumes all emissions from one stack and shows maximum emissions allowed with MAAC compliance)

Toxic	CAS No.	Category	Title III HAP	MAAC $\mu g/m^3$	Maximum Allowed PPH
1,1,2 trichloroethane	79-00-5	A	yes	545	54.00
ethyl acrylate	140-88-5	A	yes	200	20.00
acrylonitrile	107-13-1	A	yes	20	2.00
cobalt compounds	7440-48-4	A	yes	0.5	0.05
ethyl alcohol	64-17-5	B	no	38,000	3800.00
glycol ethers	110-80-5	B	yes	36	3.50
methyl methacrylate	80-62-6	B	yes	8,200	820.00
trimethylamine	121-44-8	B	yes	800	80.00
ethyl benzene	100-41-4	C	yes	43,427	4350.00
glycol ethers	108-65-6	C	no	36,000	3500.00
glycol ethers	111-90-0	C	yes	274	27.00
glycol ethers	70657-70-4	C	no	11,000	1100.00
hydrochloric acid	7647-01-0	C	yes	700	70.00
methyl alcohol	67-56-1	C	yes	26,216	2625.00
methyl ethyl ketone	78-93-3	C	yes	59,000	5900.00
methyl isobutyl ketone	108-10-1	C	yes	20,486	2050.00
toluene	108-88-3	C	yes	37,668	3760.00
xylene	1330-20-7	C	yes	43,427	4350.00
ethyl glycol	107-21-1	C	yes	12,695	1269.00
cyclohexanone	108-94-1	C	no	10,036	1004.00
tetrahydrofuran	109-99-9	C	no	58,993	5899.00
isopropyl alcohol	67-63-0	C	no	98,339	9834.00

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SECTION B Source Specific Conditions

1. The permittee shall be authorized to operate the facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)]

2. This permit subsumes all permits previously issued for this facility. The relevant conditions from these old documents have been included in the permit and/or updated to reflect the requirements of state and federal rules and regulations as of the date of this Part 70 (Title V) permit. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related or associated with the air contaminant sources in accordance with the requirements, limitations, and conditions in this permit. [OAC 252:100-8-6(a)]

3. Within six months of the date of this pemit, any rotating pump or compressor not located in a total enclosure and handling organic material compounds shall be equipped with mechanical seals or other equipment of equal efficiency; and reciprocating type pumps and compressors shall be equipped with packing glands properly installed and in good working order. [OAC 252:100-37]

4. The fuel-burning equipment at this facility shall burn only pipeline-quality natural gas or No. 2 fuel oil or its equivalent containing 0.5% by weight or less sulfur. [OAC 252:100-19 &31]

5. The East Solvent Coating Room (EUG 1) operations shall be conducted in equipment with tightly closed covers and which is designed such that coating mix components are added through mixing ports which are closed when not in actual use. [OAC 252:100-45 & 40 CFR 64]

6. VOC emissions from the East and West Solution Prep. Rooms (EUG 1) shall be calculated on a mass balance daily. Solvent emissions shall be calculated as the amount of solvents used minus any solvents which the permittee can demonstrate to the satisfaction of AQD are not emitted to the atmosphere. [OAC 252:100-8-6(a)(3)(B) & 40 CFR 64]

7. Except when utilizing chlorinated solvents, all air discharges from the 15W Maker (EUG 2) during coating operations shall be vented to a thermal oxidizer, catalytic oxidizer, or equivalent device. Either an emissions control efficiency of at least 95% shall be maintained for the control device or a VOC emissions level of 25 ppm or less shall be achieved. All discharges utilizing chlorinated solvents shall be vented to a solvent recovery system that shall maintain a control efficiency of at least 95%. [OAC 252:100-8-6(a)(1) & 40 CFR 64]

8. VOC emissions from the 15W Maker (EUG 2) shall be calculated on a mass-balance daily. Solvent emissions shall be calculated as the amount of solvents used minus any solvent which are not emitted to the atmosphere (such as reclaimed solvents or solvents which are retained in the products after coating curing). [OAC 252:100-37]

9. A VOC capture efficiency of 80% for the 15W Maker (EUG 2) shall be maintained and shall be determined using an on-line measure at the duct that leads to the control device. Solvents captured shall be determined on the basis of the amount of solvent routed to the control device plus the amount of solvents retained in the products after coating curing. Capture efficiency shall be the total amount of solvents captured divided by the total amount of solvents used. [OAC 252:100-37]

10. Each boiler (EUG 6) shall have a permanent identification plate attached which shows the make, model, and serial number. [OAC 252:100-45]

11. Tanks of 400 gallons capacity or greater (EUG 6) storing an organic material with a vapor pressure greater than or equal to 1.5 psia under actual storage conditions shall be equipped with submerged fill pipes or organic vapor recovery systems. [OAC 252:100-37]

12. Displaced vapors from the 15,000 gallon MEK tank (Tank T-3), and the 10,000 gallon 1,1,2 TCA tank (Tank T-2) shall be ducted to existing carbon adsorption units or an equivalent control device. Displaced vapors from the 4300-gallon RCRA solvent tank (Tank T-1) may be vented through a conservation vent or ducted to the existing carbon adsorption units or an equivalent control device, according to the option of the permittee. [OAC 252:100-37, 63.703(c)]

13. Except as stated otherwise, the equipment of EUG-5 shall be controlled through use of one or more total enclosures, with all total enclosures vented to a thermal oxidizer which provides an overall HAP control efficiency of ≥95 percent or which results in an outlet HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis [63.703(c)(1), 63.703(c)(2)]

14. HAP emissions from particulate transfer operations of EUG-5 shall be limited by use of either the following as allowed by 40 CFR 63 Subpart EE [63.703(d)]:

a) an enclosed transfer method to perform particulate HAP transfer; or

b) a hood or enclosure directed to a baghouse or fabric filter that exhibits no visible emissions while controlling HAP emissions from particulate HAP transfer.

15. Gaseous HAP emissions from wash sinks of EUG-5 shall be limited by [63.703(e)]:

a) use of a control device providing overall HAP control efficiency of at least 88%; or

b) maintaining a minimum freeboard ratio of 75 percent in the wash sink at all times when the sink contains HAP

16. Gaseous HAP emissions from equipment for flushing fixed lines of EUG-5 shall be limited by [63.703(f)]:

a) providing an overall HAP control efficiency of at least 95%; or

b) use of a closed system for flushing fixed lines.

17. The control requirements of Specific Conditions 13, 14, 15 and 16 apply during periods of startup and shutdown, and whenever magnetic tape manufacturing operations are taking place on EUG-5. [40 CFR 63.701(f), 40 CFR 63.705(i)]

18. A total enclosure shall be deemed to exist if each of the criteria of 40 CFR 63.705(c)(4) are met. [40 CFR 63.705(c)(4)]

19. The valve position of each bypass vent of EUG-5 that could potentially divert a vent stream away from the control device to the atmosphere shall be monitored continuously. [63.704(c)(10)(iii)]

20. Pressure relief valves and vacuum relief valves may be used for safety purposes according to 40 CFR 63.703(j). [40 CFR 63.703(j)]

21. Except as noted in Section D Testing Requirements #5, compliance with non-opacity emissions standards shall be determined according to 40 CFR 63.6(f). [40 CFR 63.6(f)]

22. By maintaining compliance with 40 CFR 63, Subpart EE as outlined in Section C, Specific Conditions No. 4 and 5, and Section B, Specific Conditions No. 15 through 24, the affected sources (EUG-5) are in compliance with the less stringent 40 CFR 60, Subpart SSS that sets standards of performance for magnetic tape coating facilities and with OAC 252:100-37, Part 5, that sets standards for the control of emissions from organic solvents. The affected sources are furthermore in compliance with all other requirements of 40 CFR 60, Subpart SSS and 40 CFR 60, Subpart A by maintaining compliance with relevant requirements of 40 CFR 63, Subpart A and Subpart EE as are stated in other sections of the permit.

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SECTION C Monitoring Requirements

1. The permittee shall maintain accessible monitoring equipment to verify that the 15W Maker (EUG 2) thermal oxidizer is operating at a temperature of at least 1400 ^{o}F or that a catalytic oxidizer is operating at a temperature of at least 600 ^{o}F. If performance testing shows 95% VOC control efficiency at a lower temperature, that lower temperature will supersede the 600 ^{o}F requirement. [OAC 252:100-43 & 40 CFR 64]

2. As an alternative to Section D, Specific Condition No. 3, the permittee may install and operate continuous emissions monitoring systems capable of verifying compliance with emissions limitations. [OAC 252:100-45]

3. The combustion temperature shall be monitored as the site operating parameter for the oxidizer of EUG-5 whenever HAP from magnetic tape manufacturing operations are vented to the control device. The combustion temperature shall be maintained at 1400°F or higher, arithmetic average over any 3-hr interval [40 CFR 63.704(b)(3), 40 CFR 63.704(b)(8), 40 CFR 63.704(c)(3)(iv), Subsumed ODEQ Permit No. 95-363-O]

4. The combustion temperature of the thermal oxidizer according to Section C, Specific Condition No. 3 shall be 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 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. [40 CFR 63.704(c)(2)(ii), 40 CFR 63.704(c)(5), 40 CFR 63.8(c)(1)(iii), 40 CFR 63.705(j)]

5. For any Continuous Monitoring System (CMS) which includes a thermocouple, the following requirements of 40 CFR 63.8 apply to the thermocouple:

Cit. (40 CFR 63)	
8(c)(1)(i)	A thermocouple shall be replaced immediately upon a malfunction becoming known, and one or more spare thermocouples shall be maintained at the plant site. For purposes of this requirement, the term “immediate” has the following meaning: within 3 days of malfunction
8(c)(2)	The thermocouple shall be located to provide representative temperature measurements
8(c)(4)	The thermocouple shall be in continuous operation during all periods that there are HAP emissions from the equipment of EUG-5 (except the bulk storage tank for MEK), except during any period of thermocouple malfunction or routine or non-routine replacement of

the thermocouple

8(g)(3) Data may be recorded in reduced or non-reduced form

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5. Continued

8(g)(4) Data shall be converted into units of the relevant standard for reporting purposes

8(g)(5) Exclude from any data averaging: monitoring data recorded during periods of unavoidable breakdown of the thermocouple or during periods of replacement of the thermocouple

6. Visible emission testing shall be performed according to 40 CFR 63.704(e) each day that particulate HAP transfer occurs (i.e. introduction of a particulate HAP into other dry ingredients or a liquid solution) at EUG-5, except in such cases where the exhaust of a baghouse or fabric filter, according to Section B, Specific Condition No. 14, is routed to a thermal oxidizer, catalytic oxidizer, or other control device provided for the purpose of controlling volatile HAP emissions. Where opacity testing is required, compliance with opacity emission standards of EUG-5 will be determined according to 40 CFR 63.6(h) (as modified by Table 1 of 40 CFR 63 Subpart EE). [40 CFR 63.704(e), 40 CFR 63.705(j), 40 CFR 63.6(h)]

7. The site operating parameter for each baghouse or fabric filter used to limit particulate HAP from particulate transfer operations of EUG-5, according to Section B, Specific Condition No. 16, shall be the minimum ventilation air flow rate, as supported by engineering calculations, through the inlet duct to the baghouse or fabric filter that ensures that particulate HAP are being captured and delivered to the control device. Instrumentation shall be installed, calibrated, and operated as necessary to continuously monitor the ventilation air flow rate in the inlet duct to the baghouse or fabric filter whenever particulate HAP transfer occurs. In such cases that the exhaust of the baghouse or fabric filter is routed to a thermal oxidizer, catalytic oxidizer, or other control device as noted in Specific Condition 6 of Section C, the operating status of the control device may be substituted for the requirement for instrumentation on the inlet duct of the baghouse or fabric filter. [40 CFR 63.704(b)(7), 40 CFR 63.704(e), 40 CFR 63.705(j)]

8. The valve position of each bypass vent of EUG-5 that could potentially divert a vent stream away from the control device to the atmosphere shall be inspected monthly. [63.704(c)(10)(iii)]

9. A site specific operating parameter(s) shall be established for each total enclosure, and instrumentation necessary to measure continuously the site-specific operating parameter(s) shall be installed prior to the operation of the total enclosure. AQD shall be notified of this operating parameter with the compliance status report required by 40 CFR 63.9(h). [40 CFR 63.704(b)(6), 40 CFR 63.704(c)(7)]

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SECTION D Testing Requirements

1. The permittee shall conduct weekly visual observations of the opacity from any fuel burning emission unit that is not using commercial pipeline grade natural gas as fuel, and keep a record of these observations. Thermal oxidizers, catalytic oxidizers, and any other air pollution control device which combusts VOCs are subject to this requirement only during such times that a supplemental fuel, if required, other than commercial pipeline grade natural gas is utilized. Periodic test-firing of a boiler with fuel oil shall be exempt from this requirement so long as it is being done for purposes of maintaining a burner in working condition and is completed within 3 days. If visible emissions are detected, then the permittee shall have a certified visible emissions evaluator conduct a 6-minute opacity reading in accordance with EPA Reference Method #9 [within 3 working days] and also verify that the emission units are operating according to design procedures for which compliance has been met. The results of these observations shall be kept on site and made available upon request. [OAC 252:100-8-6(a)(3)(A) and OAC 252:100-25]

2. If the permittee wishes to demonstrate that not all solvents used in the 15W Maker are discharged from the process, performance testing by EPA Method 24 of 40 CFR 60, or an equivalent method approved by AQD, shall be used to demonstrate adsorption or retention of solvents in or on products. [OAC 252:100-43]

3. If a catalytic oxidizer is utilized on the 15W Maker, at least once every six months, the permittee shall conduct tests of catalyst effectiveness in accordance with the manufaturer's recommendation on the air pollution controls sufficient to verify that the catalyst is active. Alternatively, catalyst effectiveness may be assessed on the basis of VOC input and emissions rates from the catalytic oxidizer as determined by mass balance and instrument measurement performed according to the manufacturer's recommendations. [OAC 252:100-43]

4. The initial compliance demonstration for particulate HAP emissions from particulate transfer operations of EUG-5 shall consist of providing engineering calculations in accordance with §63.707(h) to demonstrate that the baghouse or fabric filter is sufficient for capturing the particulate HAP. The visible emissions test under 40 CFR 63.705(g)(2)(i) shall not be required in cases where the exhaust of a baghouse or fabric filter is routed to a thermal oxidizer, catalytic oxidizer, or other control device provided for the purpose of controlling volatile HAP emissions. [40 CFR 63.705(g)(2)(i), 40 CFR 63.705(g)(2)(ii), 40 CFR 63.705(j), 40 CFR 63.707(h)]

4. The initial performance test of EUG 5 performed under 40 CFR 60, Subpart SSS meets all applicable requirements and is acceptable as compliance with the provisions of 40 CFR 63.7 and 40 CFR 63, Subpart EE, including 63.705(e)(2). 63.705(e)(3), 63.9(e), and/or 63.705(f). [40

CFR 705(a)(2), 40 CFR 63.705(e)(2), 40 CFR 63.705(e)(3), 40 CFR 63.705(f), 40 CFR 63.7, 40 CFR 63.7(h)]

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6. The initial compliance demonstration under 40 CFR 63.705(d) for the hard piping of the vent from the MEK storage tank to the solvent recovery unit is waived on the basis of an alternative demonstration that has been performed to the satisfaction of DEQ and on the basis of 40 CFR 63.7(e)(2)(iv). [40 CFR 63.705(d), 40 CFR 63.705(a)(1)]

7. U.S. EPA reference test methods or methods otherwise approved by DEQ shall be utilized according to 40 CFR 63.705(b). [40 CFR 63.705(b)]

8. For EUG 5, where emissions are captured through a room, enclosure, or hood, instrumentation shall be installed, calibrated, operated, and maintained as per manufacturer's recommendations as necessary to measure continuously a site-specific operating parameter. [40 CFR 63.704(c)(7)]

9. The initial performance test for the total enclosure shall include a plan with the Compliance Status Report to be submitted to the appropriate authority (U.S. EPA Region VI or DEQ, if granted delegation) within 180 days of the compliance date of December 15, 1997 of 40 CFR 63 Subpart EE. The plan shall identify the operating parameter to be monitored, the rationale for the parameter, and specific monitoring procedures. [40 CFR 63.704(b)(6)]

SECTION E Recordkeeping Requirements

1. All records required under this permit shall be retained on-site for at least 5 years following their date of collection and shall be in a form suitable and readily available for inspection by appropriate regulatory personnel. [40 CFR 63.10(b)(1), 40 CFR 63.706(h), 40 CFR 63.10(b)(1), OAC 252:100-8-6(a)(3)(B), OAC 252:100-43]

2. Records shall be kept that show the sulfur content of each delivery of liquid fuel used in the fuel burning equipment.

3. The following records are required for the 15W Coater. [OAC 252:100-8-6(a)(3)(B)]

a) Catalyst effectiveness verification in accordance with the manufacturer specifications, or alternatively, through determination of VOC loading on the oxidizer and emissions from the oxidizer using instrumentation similar or equal to that which exists as of the date of this permit. Said instrumentation, where elected for use, shall be calibrated and maintained according to the specifications of the instrument manufacturer.

b) Afterburner temperature (daily).

c) Each occasion during which organic solvents from the 15W Maker are vented directly to the atmosphere. Records shall indicate the dates of venting, duration, and VOC emissions rates.

3. Continued

d) Usage of chlorinated solvents (daily).

e) Emissions of non-chlorinated solvents, calculated as shown in Section B (daily).

f) Records of thermocouple maintenance according to Section C, Specific Condition 4 of this permit.

g) VOC emissions shall be recorded (daily and cumulative annual). Upon request from the appropriate regulatory authority, the permittee shall make available an hourly emissions calculation.

4. The following records of hours, quantity, or capacity, as appropriate, shall be kept to verify insignificant activities. [OAC 252:100-45]

a) Welding and soldering operations utilizing less than 100 lbs of solder and 53 tons per year of electrodes (total annual).

b) Storage tanks with less than 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature (total annual throughput).

c) Throughput from fuel storage/dispensing equipment operated solely for facility owned vehicles (gallons/month averaged over a 30 day period).

d) Date, hours of operation, boiler ID, and fuel oil consumed for any short term firing (less than 3 days) of a fuel oil burner of any boiler performed for the purpose of maintaining the fuel oil burner in working condition.

5. The permittee shall keep records of the cumulative annual solvent throughput of each storage vessel identified under Section A, Specific Condition 2. [OAC 252:100-8-6(a)(3)(B)]

6. The following information shall be recorded for each bypass vent of EUG-5 that could potentially divert a vent stream away from the control device to the atmosphere: [40 CFR 63.706(c)(2)]

a) Result of each monthly inspection
b) Times and durations of all periods when the valve position on any bypass line changed to the open position

7. A *Malfunction Plan* for the process operations of EUG-5, the air pollution control devices, and the thermocouple (CMS) of the thermal oxidizer shall be written and implemented according to 40 CFR 63.6(e)(3)(i) and (3)(ii). For the process operations of EUG-5, a malfunction shall be considered any failure of equipment which could reasonable result in excess emissions. The plan need not address periods of startup or shutdown. [Table 1 of 40 CFR 63 Subpart EE] Superseded versions of the *Malfunction Plan* shall be retained for 5 years from the date of revision. [40 CFR 63.6(e)(3)(v)] Plant SOPs or any relevant OSHA plan may serve as the *Malfunction Plan* so long as it contains all of the required information elements. [40 CFR 63.6(e)(3)(vi)] If the *Malfunction Plan* fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the plan shall be revised within 45 days.
[40 CFR 63.6(e)(3)(i), (3)(ii), (3)(v), (3)(vi), and (3)(viii); Table 1 of 40 CFR 63 Subpart EE]

8. For each malfunction of a process operation (consisting of the coating operation and the compounding operation) of EUG-5 or any air pollution control equipment of EUG-5 which could reasonably result in excess emissions, a record shall be maintained of the time and duration of the malfunction and the actions that were taken to restore the process operation or the pollution control equipment to its normal manner of operation. Such records may take the form of a checklist. [40 CFR 63.10(b)(2)(i), (ii), (iv), (v) , 63.6(e)(3)(iii) and (iv)]

9. The following information shall be maintained for the process operations (consisting of the coating operation and the compounding operation) of EUG-5. For the purposes of this requirement, "maintenance" pertains to scheduled preventative maintenance or other work intended to prevent excess emissions. [40 CFR 63.10]

Cit. (40 CFR 63)	
10(b)(2)(i)	Periods of operation of: • the coating operation of EUG-5, • the compounding operation of EUG-5, and • the air pollution control equipment
10(b)(2)(iii)	All maintenance performed on the air pollution control equipment

10. The following information shall be maintained for EUG-5: [40 CFR 63.10]

Cit. (40 CFR 63)	
10(b)(2)(viii)	All results of performance tests and, if required, opacity and visible emission observations
10(b)(2)(ix)	All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
10(b)(2)(xiv)	All documentation supporting initial notifications and notifications of compliance

status under § 63.9.

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11. The following information shall be maintained on the CMS, consisting of a thermocouple for the thermal oxidizer, of EUG-5: [40 CFR 63.10(b), 63.10(c), and Table 1 of 40 CFR 63 Subpart EE]

Cit. (40 CFR 63)	
10(b)(2)(vi), 10(c)(5)	The date and time identifying each period that a thermocouple is not operating, including periods when a thermocouple is being replaced
10(b)(2)(x), 10(b)(2)(xi)	Each occurrence of replacement of a thermocouple
10(c)(1)	All thermocouple measurements according to Section C, Specific Condition 3
10(c)(7)	The date and time of each period of thermocouple readings which are less than the required minimum temperature (3-hr averaging period according to Section C, Specific Condition 3) which occurs during periods of process or control equipment malfunction
10(c)(8)	The date and time of each period of thermocouple readings which are less than the required minimum temperature (3-hr averaging period according to Section C, Specific Condition 3) which occurs during periods other than process or control equipment malfunction
10(c)(10)	The nature and cause, if known, of any malfunction of a thermocouple
10(c)(11)	The corrective action taken or preventive measures adopted in response to a malfunctioning thermocouple
10(c)(15)	The affected source's Malfunction Plan or records kept to satisfy the recordkeeping requirements of the Malfunction Plan specified in Section E, Specific Condition 6 may be used to meet the requirements of Section E, Specific Condition 6, provided that such plan and records adequately address the requirements of paragraphs (c)(10) through (c)(12).

12. For each newly promulgated MACT standard promulgated under 40 CFR 63 and which could reasonably apply to the facility, an applicability determination and record shall be made according to 63.1(b)(3). [40 CFR 63.1(b)(3) and 63.10(b)(3)]

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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14. Recordkeeping that shows compliance with the requirements of Section D, Specific Condition No. 1 shall include: [OAC 252:100-8-6(a)(3)(A) and OAC 252:100-25]

a. Date and time of visual observations of opacity inspection
b. Stack or emission point identification
c. Operational status of the emission unit
d. Observed results and conclusion
e. Method 9 results

SECTION F Reporting and Notification Requirements

1. When periodic testing shows concentrations in excess of the emission limits in Section A, Specific Condition No. 1 and Section C, Specific Condition No. 1, except for EUG-5, the owner or operator shall comply with the provisions of OAC 252:100-9 for excess emissions during start-up, shut down, and malfunction of air pollution control equipment. [OAC 252:100-9]

2. Within 180 days of the December 15, 1997 compliance date which is applicable to EUG-5 under 40 CFR 63 Subpart EE, a *Notification Of Compliance Status* shall be submitted to AQD according to 40 CFR 63.9(h). This notification shall include: [40 CFR 63.9(h)]

Cit. (40 CFR 63)	
707(h)	Engineering calculations that support the minimum ventilation rate needed to capture
704(b)(7)	HAP particulates for delivery to the control device.
704(b)(6)	Total enclosure demonstration, according to Section D, Specific Condition 8
704(c)(7)	

3. Except in cases where the exhaust of a baghouse or fabric filter is routed to a thermal oxidizer, catalytic oxidizer, or other control device according to Section C, Specific Condition 6, the permittee shall notify USEPA Region 6 and AQD of the date of initial opacity and visible emission observations. Results of such tests shall be reported according to 40 CFR 63.10(d)(3). [40 CFR 63.10(d)(3), 40 CFR 63.9(f)]

4. Upon promulgation of the MACT standard for the source category "Paper and Other Web Coating," or promulgation of any other MACT standard that applies to existing operations of the facility, an initial notification shall be provided to the appropriate authority (U.S. EPA Region VI and AQD, if granted delegation) [63.9(a)(4)(ii)] according to 40 CFR 63.9(b)(2). [63.9(b)(1)(i), 40 CFR 63.9(b)(2), 63.9(a)(4)(ii)]

5. A *Malfunction Report* consisting of a letter shall be submitted to AQD within 30 days of the close of each semi-annual calendar reporting period during which period a malfunction occurred and the malfunction(s) was addressed in a manner consistent with the *Malfunction Plan*. Alternatively, the *Malfunction Report* may be submitted in conjunction with other reports or on a less frequent basis according to 63.10(d)(5)(i). The letter report shall consist of the following information: [40 CFR 63.10(d)(5)(i)]

a) Name, title, and signature of the responsible official who is certifying the report

b) A statement that the response to all malfunctions was according to the Malfunction Plan

6. A malfunction shall be reported to AQD by FAX or telephone within 2 working days after commencing any actions that are not consistent with the *Malfunction Plan*. The initial report shall be followed by a letter within 7 working days after the end of the event, consisting of the following information: [40 CFR 63.10(d)(5)(ii)]

a) Name, title, and signature of the responsible official who is certifying the report

b) Explanation of the circumstances of the event

c) Reasons for not following the Malfunction Plan

d) Any excess emissions or exceedances of the thermocouple readings

7. A report entitled *Summary Report – Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance* shall be submitted to AQD for each semi-annual reporting period during which time the total duration of excess emissions or average thermocouple readings below the minimum required temperature were less than 1% of the total operating period of the reporting period, or the total period of a functioning thermocouple not being in place is less than 5% of the total operating period of the reporting period. The summary report shall be submitted for the summation of hazardous pollutants emitted according to 40 CFR 63.10(e)(3)(vi), (3)(vii), and (3)(viii) and shall include the below information. [40 CFR 63.10(e)(3)(vi), (3)(vii), and (3)(viii)]

Cit. (40 CFR 63)	
707(i)(1)	Deviations of monitored values from the operating parameter
707(i)(1)	For exceedances, a description and timing of the steps taken to address the cause of the

	exceedance.
707(i)(4)	For bypass vents -- records of any time period and duration of time that flow was diverted from the control device
707(i)(4)	For bypass vents -- Results of any required monthly inspections
10(e)(3)(vi)(A)	company name and address
10(e)(3)(vi)(B)	identification of each hazardous air pollutant monitored

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Cit. (40CFR63)	
10(e)(3)(vi)(C)	beginning and ending dates of the reporting period
10(e)(3)(vi)(D)	brief description of the process units
10(e)(3)(vi)(E)	emission and operating parameter limitations specified in the relevant standard(s
10(e)(3)(vi)(F)	monitoring equipment manufacturer(s) and model number(s)
10(e)(3)(vi)(G)	date of the latest CMS certification or audit (??)
10(e)(3)(vi)(H)	total operating time of the affected source during the reporting period
10(e)(3)(vi)(I)	An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes
10(e)(3)(vi)(J)	CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes
10(e)(3)(vi)(K)	description of any changes in CMS, processes, or controls since the last reporting period
10(e)(3)(vi)(L)	The name, title, and signature of the responsible official who is certifying the accuracy of the report
10(e)(3)(vi)(M)	date of the report.

8. For semi-annual periods except those covered by Section F, Specific Condition 7, an *Excess Emissions and Continuous Monitoring System Performance Report* shall be submitted according to 40 CFR 63.10(e)(3)(i), and (3)(v), and a shall include the below information. When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report. [40 CFR 63.10(e)(3)(i), and (3)(v), 40 CFR 63. 10(e)(3)(v)]

Cit. (40CFR 63)

707(i)(1)	Deviations of monitored values from the operating parameter
707(i)(1)	For exceedances, a description and timing of the steps taken to address the cause of the exceedance.
707(i)(4)	For bypass vents -- records of any time period and duration of time that flow was diverted from the control device
707(i)(4)	For bypass vents -- Results of any required monthly inspections
10(c)(5)	The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks

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Cit.(40CFR 63)	
10(c)(6)	The date and time identifying each period during which the CMS was out of control
10(c)(7)	The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of the affected source;
10(c)(8)	The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shutdowns, and malfunctions of the affected source
10(c)(10)	The nature and cause of any malfunction (if known);
10(c)(11)	The corrective action taken or preventive measures adopted
10(c)(12)	The nature of the repairs or adjustments to the CMS that was inoperative or out of control
10(c)(13)	The total process operating time during the reporting period
10(e)(3)(v)	Name, title, and signature of the responsible official who is certifying the accuracy of the report

9. The frequency of reporting of the excess emissions and continuous monitoring system performance report may be reduced according to 40 CFR 63.10(e)(3)(ii), (3)(iii), and (3)(iv). [40 CFR 63.10(e)(3)(ii), (3)(iii), and (3)(iv)]

10. All reports required by Section F shall be sent to AQD. Reports need not be sent to EPA Region 6 unless specifically required herein. A common reporting schedule may be applied upon agreement by DEQ, according to 40 CFR 63.10(a)(5), (a)(6), and (a)(7) and (a)(3). [40 CFR 63.10(a)(5), (a)(6), and (a)(7) and (a)(3); 63.10(a)(4)(ii)]

11. No later than 30 days after each anniversary date of the issuance of this permit, the permittee shall submit to AQD, with a copy to the USEPA Region VI, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6(a)(3)(C)(i)-(ii)]

SECTION G Pollution Prevention

1. In order to qualify for the alternative operating scenarios as described in Section H of the Specific Conditions, not more than 180 days after the date of this permit, the permittee shall commence implementation of a Pollution Prevention (P2) program. The P2 program required under this condition shall include, at a minimum, the following program elements which shall be detailed in a plan outside this permit according to the most recently dated and approved Memorandum of Understanding (MOU) between AQD and Imation Enterprises Corp. Specific results of the plan shall be made available to regulatory personnel upon request and as stated in the MOU. Since proprietary information may be contained within the document, every eighteen (18) months from the date of the permit, an Executive Summary of the program shall be prepared

1. Continued

by the permittee, which is sufficient to show the progress of the P-2 program at the site. [OAC 252:100-41]

A. A statement of Corporate and Site commitment to pollution prevention.

B. An employee P2 awareness, education, and training program.

C. A P2 performance measurement calculation that will quantify the effectiveness of the program

D. A description of P2 performance goals for the site.

SECTION H Preapproved Alternative Operating Scenarios

Subsection 1 Equipment and Emissions Limitations

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

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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

2. Emissions Limitations Under Pre-Approved Alternative Operating Scenarios 2 and 3

Scenario 2 – Emissions Limitss
All units emissions are the same as Scenario 1 (See Section A, Specific Condition 3) except the 2 boilers are using diesel fuel

		PM_{10}		SO_2		NOx		CO		VOC	
EU	Description	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY
9	2 Boilers	0.88	3.88	25.22	110.5	8.88	38.90	2.22	9.72	VOC CAP*	VOC CAP*

* VOC CAP according to Section A, Specific Condition 2.

Scenario 3 - Emission Limits for Preapproved Activities
(Based on Natural Gas or No. 2 Diesel (0.15% by wt. Sulfur) as fuel, 8760 hrs/yr Operation, and 100 MMBTUH Cap. Boiler)

PM_{10}	SO_2	NOx	CO	VOC

Description	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY	PPH	TPY
1 Boiler (uncontrolled) or;	1.38	6.04	0.06	0.26	14.00	61.32	3.50	15.33	Subject To VOC CAP*	
1 Boiler (low NOx)	1.38	6.04	0.06	0.26	8.10	35.48	6.10	26.72	Subject To VOC CAP*	
Storage Tanks(>10,567 gals. cap.)	-	-	-	-	-	-	-	-	Subject To VOC CAP*	
I Boiler (No. 2 Diesel as Fuel)	1.46	6.39	15.55	68.11	14.60	63.95	3.65	15.99	Subject To VOC CAP*	

* VOC CAP according to Section A, Specific Condition 2.

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Subsection 2 Standards

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]

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1. Continued

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 ≤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

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1. Continued

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.

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.

1. Continued

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.

g. Coater 12W and/or 15W modifications

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

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.

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]

1. Continued

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

Subsection 3 Monitoring

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

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2. Continued

Pre-Approval	**Cit.** (40 CFR)	**Monitoring**
EUG-5 changes, continued		
	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

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2. Continued

Pre-approval	**Cit.** (40 CFR)	**Monitoring**
EUG-5 changes, continued		
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

4. Any Continuous Monitoring System (CMS) consisting of one or more thermocouples shall meet applicable requirements of Section C, Specific Condition 5. [40 CFR 63.8(c)&(g)]

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5. Any Continuous Monitoring System (CMS) consisting of one or more CEMS (Continuous Emission Monitoring System) not including thermocouples shall meet the following requirements: [40 CFR 63.704 & 40 CFR 63.8]

Cit. (40 CFR 63)	
704(c)(2)(i)	All continuous emission monitors of gas concentrations to comply with performance specifications (PS) 8 or 9 of Part 60, appendix B, as appropriate, and Appendix F of Part 60. Quarterly audits performed under Appendix F must challenge the monitors with compounds representative of the gaseous emission stream being controlled.
8(c)(1)(i)	Immediate repair and replacement of "routine" or otherwise predictable CMS malfunctions
8(c)(1)(ii)	Malfunctions that affect the CMS and which are not addressed by the Malfunction Plan
8(c)(1)(iii)	Basis of compliance with CMS operation and maintenance requirements
8(c)(2)	Representative measurements; location of CMS
8(c)(3)	Fully operational CMS prior to or by the time of the initial performance test
8(c)(4), and Table 1 of 40 CFR 63 Subpart EE	Continuous operation of CMS (except COMS)
8(g)(2)	1-hour averages computed from four or more data points equally spaced over each 1-hour period, computing averages for periods of CMS malfunction
8(g)(3)	Data may be recorded in reduced or non-reduced form
8(g)(4)	Data shall be converted into units of the relevant standard for reporting purposes
8(g)(5)	Exclude from any data averaging: monitoring data recorded during periods of unavoidable CMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level adjustments
8(c)(6)	For CMS other than temperature monitors – check zero (low-level) and high-level calibration drifts at least once daily
8(c)(7)	For CMS other than temperature monitors – Response to out-of-control CMS
8(c)(8)	Reporting of out-of-control CMS
8(d)(2)	Written CMS quality control program

8(e)	Performance evaluation of continuous monitoring systems
8(e)(4)	Conduct of performance evaluation and performance evaluation dates
8(e)(5)	Reporting performance evaluation results

6. Each enclosure shall meet the requirements of Section C, Specific Condition No. 9.

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Subsection 4 Compliance and Performance Testing Procedures

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 minumum 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.

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1. Continued

(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	60.113b(b)	Testing procedures

roof		
Closed vent system with control device	60.113b(c)	Testing procedures

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3. Continued

Pre-approval	**Cit.** (40 CFR)	**Compliance and performance testing procedures**
Boilers, according to Section H, Sub. 1, Specific Condition 1(c)		
Boiler (< 100 MMBTUH)	60.11	Opacity compliance and standards
	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)

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3. Continued

Pre-approval	**Cit.**(40 CFR)	**Compliance and performance testing procedures**
EUG-5 changes, continued		
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)

4. Performance testing requirements under 40 CFR 63 Subpart EE that are applicable to all pollution control devices:

Cit.(40 CFR 63)	
705(d)	Initial compliance demonstration for any tanks or equipment that is hard-piped to control device
705(j)	Use of alternative techniques for compliance demonstration

5. Performance testing shall be done according to requirements under 40 CFR 63.7 that are applicable to all pollution control devices, per 1c and d of Section H Subsection 2:

Cit. (40 CFR 63)	Summary of requirements
7(a)(2)	Timing of initial performance test
7(b)(1)	Notification of performance test
7(b)(2)	If unable to perform test on the declared date
7(c)(2)(i)	Submission of site-specific test plan
7(c)(2)(iv)	Test plan submittal

7(c)(3)	Approval of site-specific test plan by ODEQ
7(c)(4)(i)	Performance test method audit program
7(d)	Performance testing facilities
7(e)(1)	Record of conditions of performance test
7(e)(3)	3 separate test runs for performance test
7(f).	Use of alternative test method
7(g)(1)	Report results of performance test within 60 d
7(g)(3)	Retention of performance test results

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6. Preapproved activities listed in Section H, Subsection 1, Standard Condition 1 must also meet any appropriate requirements of Section D, Specific Conditions 4, 5, 6, or 7.

Subsection 5 Recordkeeping and Reporting

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.

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1. Continued

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).

2. Under OAC 252:100-41, hazardous and toxic air pollutants not previously analyzed by AQD shall be categorized according to toxicity. Prior to using these substances the permittee shall send toxicological summaries of studies on the substances and their Material Safety Data Sheets (MSDS) to AQD along with a request for categorization and an estimate of the expected emission rates. Air Quality will attempt (Staff availability permitting) to send the categorization by fax or

telephone to the identified Imation Enterprises Corp. contact person within 72 hours of receipt by AQD of the request and supporting materials.

3. If new hazardous and toxic air emissions rates are greater than OAC 252:100-41 de minimis levels, MAAC will be developed at the same time that categorization is made. If the substance has been categorized, but has not had a MAAC determination, the MAAC will be developed by AQD which will attempt (Staff availability permitting) to send the MAAC determination by fax or telephone to the identified Imation Enterprises Corp. contact person within 72 hours of receipt of the appropriate request that includes toxicological summaries of studies on the substance(s) and appropriate MSDS.

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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.

6. Continued

(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.

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)]

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

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8. Continued

Pre-approval	**Cit.** (40 CFR)	**Reporting & Recordkeeping**
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.

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8. Continued

Pre-approval	**Cit.**(40 CFR)	**Reporting & Recordkeeping**
EUG-5 changes, continued		
	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 calculationwith 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.

9. The following recordkeeping and reporting requirements apply to wash tanks for which compliance with standards is by ensuring a minimum freeboard ratio of 75 percent:

Cit. (40 CFR 63)	
706(b)	record whether or not the minimum freeboard ratio has been achieved every time that HAP solvent is added to the wash sink
707(I)(3)	Include with reports under Section F, Specific conditions 8 and 9 Wash tanks and compliance by freeboard ratio: violations of the standard (freeboard ratio is less than 75 percent)

10. For equipment subject to a standard under 40 CFR 63 whose emissions are captured other than by a total enclosure: Include a plan with the compliance status report of § 63.9(h) that: [40 CFR 63.704(b)(6)]
(A) Identifies the operating parameter to be monitored;
(B) Rationale for parameter; and
(C) specific monitoring procedures

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11. Reporting where an alternate HAP outlet concentration has been established (applies to emitting equipment except the coater and does not apply to control by the thermal oxidizer) according to 40 CFR 63.707(k).

12. General reporting requirements that are applicable to all types of pollution control devices subject to 40 CFR 63 Subpart EE:

Cit. (40 CFR 63)	
8(b)(3)	Use of and reporting of multiple and backup CMSs
10(d)(2)	Submittal of any required performance tests under Subpart 63

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)]

TITLE V (PART 70) PERMIT TO OPERATE
STANDARD CONDITIONS
(February 27, 1998)

SECTION I. DUTY TO COMPLY

A. This is a permit to operate this specific facility in accordance with Title V of the federal Clean Air Act (42 U.S.C. 7401, et seq.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated thereunder. [OAC 252:100-8]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances.

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, for revocation of the approval to operate under the terms of this permit, or for denial of an application to renew this permit. This permit is valid for operations only at the specific location listed. [OAC 252:100-8-6 (a)(7)(A)]

D. 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. [OAC 252:100-8-6 (a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from emergency conditions and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV. [OAC 252:100-8-6 (g)]

B. Deviations which result in emissions exceeding those allowed in this permit shall be reported as provided in OAC 252:100-9, Excess Emission and Malfunction Reporting Requirements. [OAC 252:100-8-6 (a)(3)(C)(iv)]

C. Oral notifications shall be made to the AQD central office as soon as practical during normal office hours and no later than the next working day. Written notifications shall also be made to the AQD central office within ten business days. Every written report submitted under this section shall be certified by a responsible official. [OAC 252:100-8-6 (a)(3)(C)(iii) and (iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

[OAC 252:100-8-6 (a)(3)(B)(ii), 8-6 (c)(1), and 8-6 (c)(2)(B)]

B. If continued compliance demonstration testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II of these standard conditions. [OAC 252:100-8-6 (a)(3)(C)(iii)]

C. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-45, Monitoring of Emissions, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

D. The results of any routine, continuous or periodic monitoring shall be reported at 6-month intervals, commencing on the first day of the month beginning six (6) full months after the date of approval to operate under the terms of this permit. All instances of deviations from permit requirements shall be clearly identified in the report.

[OAC 252:100-8-6 (a)(3)(C)(i)-(ii)]

E. Submission of quarterly or semi-annual reports required by any applicable requirement which are duplicative of the reporting required in the previous paragraph will satisfy the reporting requirements of the previous paragraph if noted on the submitted report.

F. Records of required monitoring shall include:

(1) the date, place and time of sampling or measurement;
(2) the date or dates analyses were performed;
(3) the company or entity which performed the analyses;
(4) the analytical techniques or methods used;
(5) the results of such analyses; and
(6) the operating conditions as existing at the time of sampling or measurement.

[OAC 252:100-8-6 (a)(3)(B)(i)]

G. Every report submitted under this section shall be certified by a responsible official.

[OAC 252:100-8-6 (a)(3)(C)(iv)]

H. Any owner or operator subject to provisions of NSPS shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility or any malfunction of the air pollution control equipment. [40 CFR 60.7 (b)]

I. Any owner or operator subject to the provisions of NSPS shall maintain a file of all measurements and other information required by this subpart recorded in a permanent file suitable for inspection. This file shall be retained for at least two years following the date of such measurements, maintenance, and records. [40 CFR 60.7 (d)]

J. The permittee of a facility which is operating subject to a schedule of compliance shall submit to DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted. [OAC 252:100-8-6 (c)(4)]

K. All testing must be conducted by methods approved by the Executive Director under the direction of qualified personnel. All tests shall be made and the results calculated in accordance with test procedures described or referenced in the permit and approved by Air Quality. When a portable engine analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and with the following conditions:
[OAC 252:100-43]

(1) Engines shall be tested "as found." No tuning or maintenance for the purpose of lowering emissions is allowed on the day of the emission sampling.
(2) Three test runs shall be conducted at 90% or greater of the full load as stated in the permit if possible. Exceptions to this must be documented. The load and other parameters used to calculate emissions shall be documented and included in the report.
(3) During the emission tests the rated horsepower, the moisture content, the concentrations of NO_X, CO, and O_2, the flow rate, and the temperature of the exhaust gases shall be monitored (or calculated by an accepted method) and recorded. This information shall be included in the report.
(4) After a correlation is established between the load and the concentration of a pollutant, the periodic testing may consist of only testing the pollutant concentration. Exhaust flow rates at the time of correlation (by 40 CFR 60 – Method 19, by manufacturer's correlation, or during initial testing) may be used to calculate the emission rates for later tests.

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of this permit, the permittee shall submit to AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6 (c)(5)(A), (C)(v), and (D)]

B. The certification shall describe the permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period; and a statement that the facility will continue to comply with all applicable requirements.
[OAC 252:100-8-6 (c)(5)(C)(i)-(iv)]

C. Any document required to be submitted in accordance with this permit shall be certified as being true, accurate, and complete by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete.
[OAC 252:100-8-5 (f) and OAC 252:100-8-6 (c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. Except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.
[OAC 252:100-8-5 (d)(8)(C) and OAC 252:100-8-6 (c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements which become effective during the permit term and which are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6 (c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6 (f)(1)]

B. Those requirements which are applicable are listed in the Evaluation Memorandum, the Standard Conditions, and the Specific Conditions of this permit. Those requirements which are not applicable are listed in the Evaluation Memorandum. [OAC 252:100-8-6 (f)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY AND FEE PAYMENT

A. The permittee shall file with the Air Quality Division of DEQ an annual emission inventory and shall pay annual fees based on emissions inventories.
[OAC 252:100-8-9 and OAC 252:100-8-6 (a)(8)]

B. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD. If emission factors provided by the permittee in the application were used to establish the emission limits of the permit, then the same factors shall be used to calculate actual emissions for the inventory.

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of this permit shall be five years from the date of issuance. [OAC 252:100-8-6 (a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration.[OAC 252:10

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege.
[OAC 252:100-8-6 (a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued.

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to DEQ, upon receipt of a written request and within sixty (60) days of the request unless DEQ specifies another time period, any information that DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to DEQ copies of records required to be kept by the permit.
[OAC 252:100-8-6 (a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. (1996) 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.
[OAC 252:100-8-5 (b)(10) and OAC 252:100-8-6 (a)(7)(E)]

C. Notification to the Air Quality Division of DEQ of the sale or transfer of ownership of this facility is required and shall be made in writing within 10 days after such date.
[OAC 252:100-7-2(c)(2)]

SECTION XII. REOPENING, MODIFICATION AND REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation, reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.
[OAC 252:100-8-6 (a)(7)(C) and OAC 252:100-8-7 (e)(1)]

B. DEQ will reopen and revise or revoke this permit as necessary to remedy deficiencies in the following circumstances:

(1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
(2) DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
(3) DEQ determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ. [OAC 252:100-8-7(f)]

C. If "grandfathered" status is claimed and granted for any equipment covered by this permit, it shall only apply under the following circumstances:

(1) It only applies to that specific item by serial number or some other permanent identification.
(2) Grandfathered status is lost if the item is significantly modified or if it is relocated outside the boundaries of the facility.

D. To make changes other than (1) those described in Section XVIII (Operational Flexibility), and (2) administrative permit amendments, in which added emissions will exceed the thresholds listed below, the permittee shall notify AQD. Such changes may require a permit modification.
[OAC 252:100-8-7]

- Above 1.0 lb/hr of criteria pollutant and not covered under the Insignificant and/or Trivial Activities Lists
- Above a toxic de minimis level per OAC 252:100-41 and/or exceeding an established MAAC.

SECTION XIII. INSPECTION AND ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S.(1996)2-5-105(18) for confidential information submitted to or obtained by the DEQ under this section):
[OAC 252:100-8-5 (b)(10)]

(1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
(2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(4) as authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6 (c)(2)]

SECTION XIV. EMERGENCIES

A. Any emergency and/or exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. The degree of promptness in reporting shall be proportional to the degree of danger.

[OAC 252:100-8-6(a)(3)(c)(iii)(I) and (II)]

B. 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 this permit, due to unavoidable increases in emissions attributable to the emergency. [OAC 252:100-8-6 (g)(1)]

C. An emergency shall constitute an affirmative defense to an action brought for noncompliance with such technology-based emission limitation if the conditions of paragraph D below are met.

[OAC 252:100-8-6 (g)(2)]

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

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) the permittee submitted notice of the emergency to AQD within 24 hours of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

(5) the permittee submitted a follow up written report within 10 working days of first becoming aware of the exceedance. [OAC 252:100-8-6 (g)(3)and (5)]

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6 (g)(4)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop, and register with the appropriate agency, a risk management plan, by June 20, 1999 or the applicable effective date. [OAC 252:100-8-6 (a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate emissions sources and/or conduct activities which are 1) listed on the "Insignificant Activities List" dated March 27, 1996, and 2) identified in the application.

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate emissions sources and/or conduct activities which are listed on the "Trivial Activities List" with the Title V Application Guide dated March 27, 1996.

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. Any operating scenario specified in the permit may be implemented by the facility without the need for any permit revision or any notification to DEQ. When an operating scenario is changed, the permittee shall record in a log the scenario under which it is operating.

B. The permittee may make changes within the facility that:

(1) result in no net emissions increases,
(2) are not modifications under any provision of Title I of the federal Clean Air Act, and
(3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of 7 days, or 24 hours for emergencies as defined in OAC 252:100-8-6 (g). The permittee, DEQ, and EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this subsection.

SECTION XIX. OPERATIONAL LIMITATIONS

A. The following limitations apply to the facility unless elsewhere covered by a more restrictive requirement:

(1) No person shall cause or permit the discharge of emissions such that National Ambient Air Quality Standards (NAAQS) are exceeded on land outside the permitted facility. [OAC 252:100-3]

(2) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]

(3) No particulate emissions from new fuel burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]

(4) No discharge of greater than 20% opacity is allowed except for short-term discharges which shall not exceed 60% for a total of 5 minutes in any one hour period, nor 20 minutes in any 24 hour period. [OAC 252:100-25]

(5) No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

(6) No sulfur oxide emissions from new gas fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

(7) Except as otherwise provided, no person shall cause or permit the emissions of any toxic air contaminant in such concentration as to cause or to contribute to a violation of the MAAC. **(State only)** [OAC 252:100-41]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B. [40 CFR 82, Subpart F]

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.

(2) 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.

(3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166.

(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158.

(6) 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.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements.

[40 CFR 82, Subpart B]

Note: 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.

MEMORANDUM OF UNDERSTANDING
Between
IMATION ENTERPRISESCORP.
And
DEPARTMENT OF ENVIRONMENTAL QUALITY

This Memorandum of Understanding (MOU) is made between IMATION Enterprises Corp. (IMATION) located at Weatherford, OK and the Department of Environmental Quality (DEQ).

I. PURPOSE

The purpose of this MOU is to clarify the respective duties and responsibilities of the said Parties concerning the acceptable implementation of the Pollution Prevention (P2) Program. IMATION must sustain an acceptable P2 Program in order to renew the flexibility options under Section H of Title V Operating Permit, No. 97-380-TV.

II. POLLUTION PREVENTION PROGRAM

IMATION shall develop and implement a P2 Program at the Weatherford, OK facility. The P2 Program shall, at a minimum, contain the following elements:

a) A written policy statement describing ownership and management support for emission prevention and full plan implementation;

b) Employee awareness, education, and training programs to maximize the use of rational emission prevention techniques;

c) Numeric performance goals for emission prevention and how measured and;

d) Semi-annual leadership reviews according to Section IV of the MOU.

III. REVIEW AND REPORT

1. IMATION shall conduct a comprehensive review to determine the acceptability of the implementation of the P2 Program. IMATION shall prepare a summary report on all P2 activities as contained in the program, no later than eighteen months after the issuance of the Title V Operating Permit. Said report and related P2 Program information shall be available for DEQ inspection only at the facility. An additional review and report of this same type may be requested by either party. The requesting party shall notify the other party six (6) months prior of the requested date.

2. The following factors may be used by, DEQ in determining the acceptability of the P2 Program:

a) Documentation showing efforts to prevent VOC air emission by 10% over the life of the operating permit, using 1997 as the baseline condition. Documented attainment of the P2 goal (at the rate of 2% per year and 10% over the life of the permit) shall be considered acceptable implementation;

b) An overall emission rate per pollutant per unit of production;

c) Percent of emissions prevented due to P2 activities, overall prevention (in tons per year), and incremental prevention units achieved since the issuance of the Title V Operating Permit;

d) Future P2 activities being considered for implementation;

e) Compilation of all internal P2 meeting minutes and internal review summaries;

f) A statement from IMATION management stating their commitment to improve current P2 activities and to continue the search for new P2 activities; and

g) P2 training records and any changes or proposed changes to the P2 program.

3. DEQ personnel shall inspect the facility and review said report at the facility only to determine acceptability of the P2 Program eighteen (18) months after the issuance of the Title V Operating permit. No photocopies or notes of said report or any of any related P2 Program information shall be made by DEQ personnel. DEQ shall provide IMATION a written report indicating any deficiencies in the development and implementation of the P2 Program within sixty (60) days following the site visit. If DEQ determines that the Program is unacceptable another comprehensive review and report shall be conducted by IMATION within eighteen (18) months of said determination. IMATION must provide documentation showing efforts to identify and correct any deficiencies and all future P2 activities in order for the P2 program to be considered acceptable. If the implementation of the P2 Program is not considered acceptable, Section H of the Title V Operating Permit will not be renewed.

IV. INTERNAL REVIEW

IMATION shall conduct a semi-annual internal review of all P2 activities and results. The review shall include, but not be limited to,:

a) General Business direction and P2 implications;

b) Review of P2 performance and goals;

c) General List of P2 activities completed since last review, including activities completed on “grandfathered” sources such as 12W;

d) General Review emissions and other waste stream levels;

e) Provide project updates; and,

f) List of P2 activities considered, but not implemented, since the last review.

V. GENERAL

1. IMATION shall maintain all P2 documentation at the facility and make available for review at the facility premises only by DEQ personnel upon request. IMATION may segregate or indicate which records or other documentation is business confidential. Confidential records and other documents may be reviewed but not copied by DEQ.

2. In order to protect confidentiality, IMATION shall prepare an annual Executive Summary of the P2 Program. The Executive Summary shall be provided to AQD, and following review, be placed in the IMATION Company File located at the DEQ, Air Quality Division, office.

3. DEQ shall make recommendations IMATION in the preparation and dissemination of P2 information to the general public.

4. DEQ shall provide to IMATION any technical, regulatory and compliance assistance as needed.

VI. AMENDMENTS AND TERMINATION

1. This MOU shall be subject to amendment at any time upon written consent and approval by both parties, and subject to termination, in whole or in part, upon thirty (30) days advance notice by either party. If termination occurs Section H of the Title V Operating Permit will become null and void.

2. DEQ retains the right to reopen the Title V Operating Permit for cause under OKLA. STAT. tit. 27A § 2-5-112 (B)(1).

DONE and EFFECTIVE as of the date of the later signature appearing below.

_____	_____
IMATION Enterprises Corp.	Mark S. Coleman Executive Director Department of Environmental Quality
_____	_____
Date	Date