
MACT COMPLIANCE OPTIONS FOR COMPLIANT COATINGS APPROACH

This example provides a summary of the subpart KK compliance options for a facility that operates wide-web flexographic presses and uses compliant coatings. It also provides a table illustrating the types of corresponding permit terms that you might consider.

EXAMPLE

Compliance Options for a Wide-Web Flexographic Facility Using Compliant Coatings

Example Facility

The facility is assumed to be an existing major source of HAP that operates six wide-web flexographic printing presses, designated as WWF01 through WWF06. The facility has opted to meet subpart KK through the use of compliant materials (low-HAP inks, solvents, etc.).

Applicability

Under the definitions in 40 CFR § 63.822, the presses at this facility are considered "wide-web flexographic presses." Because the facility is a major source of HAP that operates such a press, subpart KK applies to the facility [see 40 CFR § 63.820(a)(1)].

The "affected source" under subpart KK consists of all six presses combined. None of the presses qualify for the exemptions for proof presses [see 40 CFR § 63.821(a)(2)(i)]; for ancillary printing presses primarily used for coating, laminating, or other operations; see 40 CFR § 63.821(a)(2)(ii)]; or for incidental printing presses; see 40 CFR § 63.821(b)(1) and (2)]. Further, the facility has not elected to include in the affected source any stand-alone coating equipment that would be eligible for inclusion under 40 CFR § 63.821(a)(3).

Method of Compliance Determination

For this example, the facility has a wide margin of compliance because most inks, solvents, etc., have very low (or zero) HAP content, although a few low-use materials are not compliant as purchased. The facility will demonstrate compliance based on purchase records, treating all materials as if they were used on the day they were delivered to the facility. This approach, which minimizes tracking procedures, is possible because of the wide margin of compliance.

Desired Compliance Flexibility

For the permit conditions that follow, the facility wishes to maintain the flexibility to demonstrate monthly compliance using any of the six options in the rule that are based on compliant materials.

EXAMPLE

Compliance Options for a Wide-Web Flexographic Facility Using Compliant Coatings

Example Permit Conditions for subpart KK

APPLICABILITY OF 40 CFR PART 63, SUBPART KK

1. The facility is subject to the provisions of 40 CFR part 63, subpart KK[↗]National Emission Standards for the Printing and Publishing Industry (hereinafter [↖]subpart KK[↗]).

[see 40 CFR [↖] 63.820(a)(1)] In addition, the facility is subject to the provisions of 40 CFR part 63, subpart A[↗]General Provisions (hereinafter [↖]the General Provisions[↗]), to the extent specified in Table 1 of subpart KK [see 40 CFR [↖] 63.823]. For convenience, Table 1 of subpart KK is attached to this permit. Subsequent conditions of this permit specify how the applicable General Provisions sections related to performance tests and monitoring are to be applied to this facility.
2. The affected source consists of the six wide-web flexographic presses designated by the facility as WWF01 through WWF06. [[↖] 63.821(a)(2)] Each wide-web flexographic press included in the affected source consists of the unwind or feed section; the series of work stations; the dryers associated with the work stations (including any interstage dryers and overhead tunnel dryers); and the rewind, stack, or collection station. The work stations may be oriented vertically, horizontally, or around the circumference of a single large impression cylinder. Inboard and outboard work stations (including those employing any other technology, such as rotogravure) are included if they are capable of printing or coating on the same substrate [see 40 CFR [↖] 63.822(a)].

EMISSIONS LIMITATION

3. Beginning on May 30, 1999, the facility shall limit organic HAP emissions from the affected source (1) to no more than 5 percent of the organic HAP applied for the month; or (2) to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or (3) to no more than 20 percent of the mass of solids applied for the month; or (4) to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month [see 40 CFR [↖] [↖] 63.825(b) and 63.826(a)].

For the purposes of this permit, a "month" means a calendar month [see 40 CFR § 63.822(a)].

[For this example, it is assumed that the facility did not establish an alternative prespecified period of 28 days to 35 days as allowed by § 63.822(a). As appropriate, an alternative month may be specified during initial permit issuance, when the permit is

reopened to incorporate the MACT standard, or with a minor permit modification (MPM).]

COMPLIANCE DETERMINATIONS

4. The facility shall demonstrate compliance for each month by one of the methods indicated in Table C-1 of this permit, beginning with June 1999 [see 40 CFR § 63.825(b)(1) - (6)].

[Condition No. 4 is based on the facility being an existing source with a compliance date of May 30, 1999. The date should be adjusted as appropriate for new or reconstructed affected sources with different applicable compliance dates. Including the date reinforces that compliance demonstrations using compliant coating options begin immediately upon the compliance date and that the General Provisions allowance for later performance tests does not apply.]

The compliance demonstration methods are summarized below (see the cited sections of the rule for the full requirements):

A. § 63.825(b)(1)

- i. Determine the organic HAP content, on an as-purchased basis, of each material applied during the month. (See Condition No. 5 for HAP content determination procedures.)
- ii. Show that the organic HAP weight fraction of each material is ≤0.04.

B. § 63.825(b)(2)

- i. Determine the organic HAP content, on an as-purchased basis, of each material applied during the month. (See Condition No. 5 for HAP content determination procedures.)

- ii. Measure the mass of each solids-containing material (e.g., ink) applied during the month, on an as-purchased basis. (See Condition No. 6 for material usage tracking procedures.)
- iii. For each individual solids-containing material, measure the mass of each non-solids-containing material (e.g., thinner) added to the solids-containing material during the month, on an as-purchased basis. (See Condition No. 6 for material usage tracking procedures.)
- iv. Calculate the monthly average as-applied organic HAP weight fraction for each solids-containing material using Equation 3 of subpart KK.
- v. Show that the monthly average as-applied organic HAP weight fraction of each solids-containing material is ≤ 0.04 .

C. i 63.825(b)(3)

- i. Determine the organic HAP content, on an as-purchased basis, of each material applied during the month. (See Condition No. 5 for HAP content determination procedures.)
- ii. Use the procedures of Condition No. 4B to determine which solids-containing materials achieve a monthly average as-applied organic HAP weight fraction ≤ 0.04 .
- iii. For solids-containing materials that do not achieve a monthly average as-applied organic HAP weight fraction ≤ 0.04 , determine the as-purchased weight fraction of solids (See Condition No. 5 for solids content determination procedures.)
- iv. For each of these other solids-containing materials, calculate the monthly average as-applied solids content using Equation 4 of subpart KK.
- v. For each of these other solids-containing materials, calculate the average monthly as-applied organic HAP-to-solids ratio using Equation 5 of subpart KK.
- vi. Show that for each solids-containing material either (1) the monthly average as-applied organic HAP weight fraction is ≤ 0.04 or (2) the monthly average as-applied organic HAP-to-solids ratio is ≤ 0.20 .

D. i 63.825(b)(4)

- i. Determine the organic HAP content, on an as-purchased basis, of each material applied during the month. (See Condition No. 5 for HAP content determination procedures.)
- ii. Measure the mass of each material applied during the month, on an as-purchased basis. (See Condition No. 6 for material usage tracking procedures.)
- iii. Calculate the monthly average as-applied organic HAP content of all materials applied using Equation 6 of subpart KK.
- iv. Show that the monthly average as-applied organic HAP weight fraction of all materials applied is ≤ 0.04 .

E. i 63.825(b)(5)

- i. Determine the organic HAP content, on an as-purchased basis, of each material applied during the month. (See Condition No. 5 for HAP content determination procedures.)
- ii. Determine the as-purchased weight fraction of solids in each solids-containing material applied during the month. (See Condition No. 5 for solids content determination procedures.)
- iii. Measure the mass of each material applied during the month, on an as-purchased basis. (See Condition No. 6 for material usage tracking procedures.)
- iv. Calculate the monthly average as-applied organic HAP-to-solids ratio using Equation 7 of subpart KK.
- v. Show that the monthly as-applied organic HAP-to-solids ratio is ≤ 0.20 . F.
 - i. Determine the organic HAP content, on an as-purchased basis, of each material applied during the month. (See Condition No. 5 for HAP content determination procedures.)
 - ii. Measure the mass of each material applied during the month, on an as-purchased basis. (See Condition No. 6 for material usage tracking procedures.)
 - iii. Calculate the total mass of organic HAP applied during the month using Equation 8 of subpart KK.
 - iv. Determine the as-purchased weight fraction of solids in each solids-containing material applied during the month. (See Condition No. 5 for solids content determination procedures.)
 - v. For the month, determine the as-purchased mass fraction of each solids-containing material which was applied at 20 weight-percent or greater solids content, on an as-applied basis.
 - vi. Determine the total mass of non-solids-containing materials added during the month to solids-containing materials which were applied at less than 20 weight-percent solids content, on an as-applied basis.
 - vii. Calculate the monthly allowable organic HAP emissions using Equation 17 of subpart KK.
 - viii. Show that the total mass of organic HAP applied during the month (from Equation 8) is less than the allowable organic HAP emissions for the month (from Equation 17).

[These monthly compliance determinations are not considered performance testing, or another form of compliance demonstration for purposes of § 63.7(a)(1) of the General Provisions. Accordingly, § 63.7 of the General Provisions, with its requirements for advance notifications, site-specific test plans, and test reports, does not apply to the monthly compliance determinations.]

PERFORMANCE TEST METHODS

5. As necessary according to Table C-1 of this permit for the selected compliance demonstration option, the facility shall determine the organic HAP, volatile matter, and/or solids weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied, using the procedures indicated in Table C-1 [see 40 CFR § 63.827(b)(2), (c)(2), and (c)(3)].

The material composition determination methods are summarized below (see the cited sections of the rule for the full requirements):

A. Organic HAP Content [§ 63.827(b)(2)]. Determine organic HAP content according to i, ii, or iii below, subject to the provisions of iv:

- i. Use Method 311 (40 CFR part 63, appendix A).
- ii. Determine volatile matter content and use this value for the organic HAP content for all compliance purposes.
- iii. Use formulation data provided on a Certified Product Data Sheet.
- iv. If a Method 311 test value is higher than formulation data, the Method 311 test data govern.

B. Volatile Matter and Solids Content [§ 63.827(c)(2) and (3)]. Determine volatile matter and solids content according to i or ii below, subject to the provisions of iii:

- i. Use Method 24 (40 CFR part 60, appendix A).
- ii. Use formulation data.
- iii. If there is any inconsistency between the formulation data and the results of Method 24, the Method 24 data govern.

[Section 63.7(f) applies if the facility wants to rely on an alternative test method for determining material composition. However, the material composition determinations required in § 63.827 generally are not considered performance tests for purposes of the General Provisions. Accordingly, the rest of § 63.7 and other related provisions of the General Provisions do not apply to these composition determinations. See Section 5.4.3 for additional guidance.]

MONITORING AND MATERIAL USAGE TRACKING REQUIREMENTS

As discussed in Chapter 4 of the TSD, we believe that it is important for you and the facility to come to a common understanding of the measurement procedures that will be used to demonstrate compliance. (See Appendix D for more on this topic.)

In this example, to achieve this end, we have included a summary of the measurement procedures in the permit. As mentioned in Chapter 4 of the TSD, we believe that this is one approach that can clarify the measurement expectations on both sides and may be appropriate for inclusion in the QA / QC plan required by subpart KK. When you and the facility have agreed on specific procedures, facility inspections and file reviews, as well as MACT and Title V compliance certifications, are straightforward and unambiguous. Another approach that can bring focus to material usage tracking systems is to classify such systems as continuous monitoring systems (CMS) that are subject to the CMS provisions of the MACT General Provisions. We have not taken this approach in this example, but we do not object to your doing so in your jurisdiction. However, should you do so, be aware that the MACT General Provisions are written to apply most directly to CEMS, COMS, and CPMS. If you take this approach, you should take care to interpret the General Provisions reasonably for the types of instruments and recordkeeping systems that make up each material usage tracking system.

6. The measurement, recordkeeping, and calculation procedures used by the facility to demonstrate compliance on a monthly basis are summarized in the following conditions:
 - A. General approach: The facility shall collect data for each month on the amount of each material applied on the wide-web flexographic printing affected source, and on the composition of each material applied (HAP, solids, and/or volatile matter content, depending on the compliance option used). Using these data, the facility shall determine its compliance status for each month using one of six options in subpart KK (see Condition No. 4).
 - B. Material usage tracking methods and location: The facility shall collect purchase records for each month on the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, diluents, and other materials used on the affected source. For purposes of demonstrating compliance, the facility shall treat each material purchased as if it were all applied on the day it was delivered to the facility. The facility shall collect data on the composition of each material, such as test data or Certified Product Data Sheets (CPDS) from the supplier. The facility shall retain material composition data in a permanent file. The facility shall determine compliance for each month using any of the six compliance options in 40 CFR 63.825(b)(1) through (6).
 - C. Indicator range: This parameter is not applicable to this monitoring approach. The facility determines compliance directly for each month by one of the six compliant coating options in 40 CFR 63.825(b)(1) through (6).
 - D. Data collection frequency: At least monthly.
 - E. Averaging period: For the compliance options in 40 CFR 63.825(b)(2), (3), (4), and (5), the facility shall average the data for each monthly compliance demonstration.

For the compliance options in 40 CFR 63.825(b)(1) and (6), the facility shall demonstrate compliance monthly, but will not average the data.

F. Recordkeeping: The facility shall keep records of data on HAP and solids content (as necessary for the compliance option) in a permanent file. The facility shall keep records of all material usage measurements (including inventory data and purchase records), and all material composition data (including Method 24/311 data and/or CPDS from suppliers) pursuant to *[insert the provisions of your title V program that implement 40 CFR 70.6(a)(3)(ii) and (iii)]*.

G. QA/QC: The facility shall review data collection, calculation, and recordkeeping procedures at least annually to ensure that they are adequate to determine compliance conclusively and that they are being implemented properly by facility personnel. The facility shall also use Method 24/311 QA/QC procedures if those methods are used.

RECORDKEEPING REQUIREMENTS

7. The facility shall maintain files of all information (including all reports and notifications) required under this permit recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche [see 40 CFR 63.829(b) and 63.10(b)(1)].
8. The facility shall maintain records as indicated in Table C-1 of this permit. Additional detail regarding these requirements, as well as additional recordkeeping requirements not related to compliance, follows:
 - A. The facility shall maintain records on a monthly basis of all measurements needed to demonstrate compliance, such as material usage, HAP usage, solids usage, and material composition [see 40 CFR 63.829(b)(1) and 63.10(b)(2)(vii)].
 - B. The facility shall maintain records of all documentation supporting the initial notification [previously submitted by the facility pursuant to 40 CFR 63.830(b)(1)] and the notification of compliance status [previously submitted by the facility pursuant to 40 CFR 63.830(b)(3)] [see 40 CFR 63.10(b)(2)(xiv)].
 - C. The facility shall maintain records of each applicability determination performed by the facility in accordance with the requirements of 40 CFR 63.820(a) [see 40 CFR

i i 63.829(b)(2) and 63.10(b)(3)].

D. The following recordkeeping requirements are not applicable to this facility at this time:

- i. Sections 63.10(b)(2)(i) - (vi) and (viii) - (xiii) and 63.10(c) do not apply because the facility does not operate an add-on control device (and consequently, startup, shutdown, and malfunction provisions do not apply) and the facility's material usage tracking system is not classified as a CMS.
- ii. Section 63.829(c) does not apply because the facility does not comply through liquid-liquid material balance.
- iii. Sections 63.829(d), (e), and (f) do not apply because the facility is not utilizing any of the exemptions with which these records are associated.
- iv. Section 63.10(b)(2)(xii) does not apply because the facility has not obtained a waiver of recordkeeping and reporting requirements pursuant to i 63.10(f).

[For this example, the facility does not have a recordkeeping and reporting waiver. If the facility had a recordkeeping and reporting waiver, i 63.10(b)(2)(xii) would apply, as well as any requirements related to the waiver (such as conditions for the waiver or alternative recordkeeping and reporting requirements). These requirements should be detailed in the permit.]

REPORTING AND NOTIFICATION REQUIREMENTS

9. The facility shall submit the reports and notifications indicated in Table C-1 of this permit and specified below. In addition to the reporting and notification requirements of subpart KK, the facility is subject to the general reporting provisions of the General Provisions at 40 CFR 63.10(d), to the extent indicated by Table 1 to subpart KK. Based on the monitoring system described in Condition No. 6 above (which is not classified as a CMS), these provisions are interpreted and applied as indicated in the following conditions:

- A. Summary reports [i 63.830(b)(6) and 63.10(e)(3)] shall be submitted on a semi-annual basis. Summary reports shall cover the periods from January 1 through June 30, and from July 1 to December 31, and shall be submitted within 30 days after the end of each period. Summary reports shall include the following information:
- i. The company name and address of the affected source
 - ii. An identification of each hazardous air pollutant
 - iii. The beginning and ending dates of the reporting period
 - iv. A brief description of the process unit

- v. The applicable emissions limitations specified in *§* 63.825
- vi. The dates of any periodic QA/QC reviews (see Condition No. 6G) that were conducted during the reporting period, and the results of these reviews
- vii. An emissions data summary identifying any months in which the affected source did not comply with the applicable emissions limitations specified in *§* 63.825
- viii. A description of any changes in processes or controls since last reporting period (if applicable)
- ix. The name, title, and signature of the responsible official who is certifying the accuracy of the report
- x. The date of the report

The schedule for submitting reports can be changed per § 63.10(a)(5), (6) and (7).

B. A report of any change in information already provided in the Notification of Compliance Status or the Initial Notification shall be provided in writing within 15 calendar days after the change. [*§* 63.9(j)]

C. The following reporting requirements are not applicable to this facility at this time:

- i. Sections 63.830(b)(2), (4), and (5) and 63.10(d)(2) and (5) do not apply because the facility does not operate an add-on control device (and consequently, the performance test provisions and the startup, shutdown, and malfunction provisions do not apply)
- ii. Sections 63.830(b)(6)(ii) - (iv) do not apply because the facility is not utilizing any of the exemptions with which this information is associated
- iii. Section 63.10(d)(4) does not apply because the facility has not received an extension of compliance and is not required to submit the associated progress reports
- iv. Sections 63.10(e) does not apply, except to the extent indicated in *§* 63.830(b)(6), because the facility's material usage tracking system is not classified as a CMS.

For this example, it is assumed that the facility has already submitted the Initial Notification and the Notification of Compliance Status (NOCS).

TABLE 1 TO 40 CFR PART 63, SUBPART KK

General Provisions Reference	Applicable to Subpart KK	Comment
i 63.1(a)(1)-(a)(4)	Yes	
i 63.1(a)(5)	No	Section reserved
i 63.1(a)(6)-(a)(8)	No	
i 63.1(a)(9)	No	Section reserved
i 63.1(a)(10)-(a)(14)	Yes	
i 63.1(b)(1)	No	Subpart KK specifies applicability
i 63.1(b)(2)-(b)(3)	Yes	
i 63.1(c)(1)	Yes	
i 63.1(c)(2)	No	Area sources are not subject to subpart KK
i 63.1(c)(3)	No	Section reserved
i 63.1(c)(4)	Yes	
i 63.1(c)(5)	No	
i 63.1(d)	No	Section reserved
i 63.1(e)	Yes	
i 63.2	Yes	Additional definitions in subpart KK
i 63.3(a)-(c)	Yes	
i 63.4(a)(1)-(a)(3)	Yes	
i 63.4(a)(4)	No	Section reserved
i 63.4(a)(5)	Yes	
i 63.4(b-c)	Yes	
i 63.5(a)(1)-(a)(2)	Yes	
i 63.5(b)(1)	Yes	
i 63.5(b)(2)	No	Section reserved
i 63.5(b)(3)-(b)(6)	Yes	

General Provisions Reference	Applicable to Subpart KK	Comment
i 63.5(c)	No	Section reserved
i 63.5(d)	Yes	
i 63.5(e)	Yes	
i 63.5(f)	Yes	
i 63.6(a)	Yes	
i 63.6(b)(1)-(b)(5)	Yes	
i 63.6(b)(6)	No	Section reserved
i 63.6(b)(7)	Yes	
i 63.6(c)(1)-(c)(2)	Yes	
i 63.6(c)(3)-(c)(4)	No	Sections reserved
i 63.6(c)(5)	Yes	
i 63.6(d)	No	Section reserved
i 63.6(e)	Yes	Provisions pertaining to start-ups, shutdowns, malfunctions, and CMS do not apply unless an add-on control system is used
i 63.6(f)	Yes	
i 63.6(g)	Yes	
i 63.6(h)	No	Subpart KK does not require COMS
i 63.6(i)(1)-(i)(14)	Yes	
i 63.6(i)(15)	No	Section reserved
i 63.6(i)(16)	Yes	
i 63.6(j)	Yes	
i 63.7	Yes	
i 63.8(a)(1)-(a)(2)	Yes	
i 63.8(a)(3)	No	Section reserved
i 63.8(a)(4)	No	Subpart KK specifies the use of solvent recovery devices or oxidizers

General Provisions Reference	Applicable to Subpart KK	Comment
i 63.8(b)	Yes	
i 63.8(c)(1)-(3)	Yes	
i 63.8(c)(4)	No	Subpart KK specifies CMS sampling requirements
i 63.8(c)(5)	No	Subpart KK does not require COMS
i 63.8(c)(6)-(c)(8)	Yes	Provisions for COMS are not applicable
i 63.8(d)-(f)	Yes	
i 63.8(g)	No	Subpart KK specifies CMS data reduction requirements
i 63.9(a)	Yes	
i 63.9(b)(1)	Yes	
i 63.9(b)(2)	Yes	Initial notification submission date extended
i 63.9(b)(3)-(b)(5)	Yes	
i 63.9(c)-(e)	Yes	
i 63.9(f)	No	Subpart KK does not require opacity and visible emissions observations
i 63.9(g)	Yes	Provisions for COMS are not applicable
i 63.9(h)(1)-(h)(3)	Yes	
i 63.9(h)(4)	No	Section reserved
i 63.9(h)(5)-(h)(6)	Yes	
i 63.9(i)	Yes	
i 63.9(j)	Yes	
i 63.10(a)	Yes	
i 63.10(b)(1)-(b)(3)	Yes	
i 63.10(c)(1)	Yes	
i 63.10(c)(2)-(c)(4)	No	Sections reserved
i 63.10(c)(5)-(c)(8)	Yes	
i 63.10(c)(9)	No	Section reserved

General Provisions Reference	Applicable to Subpart KK	Comment
i 63.10(c)(10)-(c)(15)	Yes	
i 63.10(d)(1)-(d)(2)	Yes	
i 63.10(d)(3)	No	Subpart KK does not require opacity and visible emissions observations
i 63.10(d)(4)-(d)(5)	Yes	
i 63.10(e)	Yes	Provisions for COMS are not applicable
i 63.10(f)	Yes	
i 63.11	No	Subpart KK specifies the use of solvent recovery devices or oxidizers
i 63.12	Yes	
i 63.13	Yes	
i 63.14	Yes	
i 63.15	Yes	

TABLE C-1. COMPLIANCE OPTIONS FOR WWF01 THROUGH WWF06 UNDER SUBPART KK

Affected Source: Wide-web flexographic presses WWF01 through WWF06; all emission points combined [i 63.821(a)(2)]

Emission Limits: Limit emissions for the month to #5% of the organic HAP applied; or to #4% of the mass of materials applied; or to #20% of the mass of solids applied; or to a calculated equivalent allowable mass. [i 63.825(b)]

Compliance Options: The facility may use any of the six compliance options based on compliant coatings, as detailed in the table below.

Compliant Materials Compliance Option	Performance Testing/ Compliance Demonstration	Recordkeeping	Notifications and Reporting ^a
A. i 63.825(b)(1) Each material used contains #0.04 weight fraction organic HAP, as purchased	Compliance demonstration (monthly) [i 63.825(b)(1)]; see Condition 4A HAP content analysis[i 63.827(b)(2)]; see Condition 5A	Measurements needed to demonstrate compliance [i i 63.829(b)(1) and 63.10(b)(2)(vii)] General recordkeeping [i 63.10(b)] See Conditions 7 and 8	Semiannual reports [i i 63.830(b)(6) and 63.10(e)(3)] See Condition 9
B. i 63.825(b)(2) Each <u>solids-containing</u> material used contains #0.04 weight fraction organic HAP, monthly average as-applied basis	Compliance demonstration (monthly) [i 63.825(b)(2)]; see Condition 4B HAP content analysis[i 63.827(b)(2)]; see Condition 5A Material usage measurements [i 63.825(b)(2)(ii)] (implied by Eq. 3) See Condition 6	Measurements needed to demonstrate compliance [i i 63.829(b)(1) and 63.10(b)(2)(vii)] General recordkeeping [i 63.10(b)] See Conditions 7 and 8	Semiannual reports [i i 63.830(b)(6) and 63.10(e)(3)] See Condition 9
C. i 63.825(b)(3) Each solids-containing	Compliance demonstration (monthly) [i 63.825(b)(3)]; see Condition 4C	Measurements needed to demonstrate compliance [i i 63.829(b)(1) and	Semiannual reports [i i 63.830(b)(6) and 63.10(e)(3)]

Compliant Materials Compliance Option	Performance Testing/ Compliance Demonstration	Recordkeeping	Notifications and Reporting ^a
material used contains #0.04 weight fraction organic HAP or #0.20kg HAP per kg solids, monthly average as-applied basis	<p>HAP content analysis [i 63.827(b)(2)]; see Condition 5A</p> <p>Solids content analysis [i 63.827(c)(2)]; see Condition 5B</p> <p>Material usage measurements [i 63.825(b)(3)(ii)] (implied by Eqs. 3 and 4) See Condition 6</p>	<p>63.10(b)(2)(vii)]</p> <p>General recordkeeping [i 63.10(b)]</p> <p>See Conditions 7 and 8</p>	See Condition 9
<p>D. i 63.825(b)(4)</p> <p>Average HAP content of materials applied #0.04 kg HAP per kg material, as applied</p>	<p>Compliance demonstration (monthly) [i 63.825(b)(4)]; see Condition 4D</p> <p>HAP content analysis [i 63.827(b)(2)]; see Condition 5A</p> <p>Material usage measurements [i 63.825(b)(4)] (implied by Eq. 6) See Condition 6</p>	<p>Measurements needed to demonstrate compliance [i i 63.829(b)(1) and 63.10(b)(2)(vii)]</p> <p>General recordkeeping [i 63.10(b)]</p> <p>See Conditions 7 and 8</p>	<p>Semiannual reports [i i 63.830(b)(6) and 63.10(e)(3)]</p> <p>See Condition 9</p>
<p>E. i 63.825(b)(5)</p> <p>Average HAP content of materials applied #0.20 kg HAP per kg solids, as applied</p>	<p>Compliance demonstration (monthly) [i 63.825(b)(5)]; see Condition 4E</p> <p>HAP content analysis [i 63.827(b)(2)]; see Condition 5A</p>	<p>Measurements needed to demonstrate compliance [i i 63.829(b)(1) and 63.10(b)(2)(vii)]</p> <p>General recordkeeping [i 63.10(b)]</p>	<p>Semiannual reports [i i 63.830(b)(6) and 63.10(e)(3)]</p> <p>See Condition 9</p>

Compliant Materials Compliance Option	Performance Testing/ Compliance Demonstration	Recordkeeping	Notifications and Reporting ^a
	<p>Solids content analysis [i 63.827(c)(2)]; see Condition 5B</p> <p>Material usage measurements [i 63.825(b)(5)] (implied by Eq. 7) See Condition 6</p>	See Conditions 7 and 8	
<p>F. i 63.825(b)(6) Total HAP applied less than equivalent allowable HAP</p>	<p>Compliance demonstration (monthly) [i 63.825(b)(6) and (e)]; see Condition 4F</p> <p>HAP content analysis [i 63.827(b)(2)]; see Condition 5A</p> <p>Solids content analysis [i 63.827(c)(2)]; see Condition 5B</p> <p>Calculation of monthly allowable HAP emissions [i 63.825(e)(1) - (5)]</p> <p>Material usage measurements [i 63.825(b)(6)] (implied by Eq. 8) See Condition 6</p>	<p>Measurements needed to demonstrate compliance [i i 63.829(b)(1) and 63.10(b)(2)(vii)]</p> <p>General recordkeeping [i 63.10(b)]</p> <p>See Conditions 7 and 8</p>	<p>Semiannual reports [i i 63.830(b)(6) and 63.10(e)(3)]</p> <p>See Condition 9</p>

^a The Notification of Compliance Status (NOCS) was required of all facilities (see Section 3.3.1 of this document). For this example, it is assumed that the facility already submitted the NOCS and the Initial Notification.