Paper and Other Web Coating (Subpart JJJJ)
Question and Answers (Q&A's)
FINAL 5/29/2003

This file contains frequently answered questions for part 63, Subpart JJJJ, Paper and Other Web Coating (POWC) NESHAP. While these questions and answers constitute the best available information at this time, the EPA recommends that you consult your State or local air pollution control agency for any final determinations. State and local agencies may implement provisions that are more stringent than those contained in the NESHAP.

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Compliance Date

Q1: Section 63.3330(a) lists the compliance date of Subpart JJJJ as December 5, 2005. The effective date of the rule is December 4, 2002 (also referred to as the promulgation date or date the final rule was published in the Federal Register). Usually the compliance date is 3 years after the effective date. Shouldn't the compliance date then be December 4, 2005?

A1: Although many part 63 rules do use a '3-year' compliance period, compliance dates do vary. Subpart JJJJ requires existing affected sources to comply by December 5, 2005 (3 years + 1 day). The compliance date for new sources is upon start-up or December 4, 2002, whichever is later. The proposed rule indicates that "The compliance date for existing affected sources in this subpart is [INSERT DATE 3 YEARS AFTER THE DATE OF PUBLICATION OF THE FINAL RULE IN THE FR]. The date three years after December 4, 2002 is December 5, 2005.

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Applicability

Q2: Are affiliated operations that are performed at web-coating lines covered under Subpart JJJJ or will they be subject to the Miscellaneous Organic Chemical Manufacturing NESHAP and the Miscellaneous Coating Manufacturing NESHAP?

A2: As indicated in the final rule preamble (67 FR 72332, II.B), certain affiliated operations performed at web-coating lines are part of the paper and other web source category. These affiliated operations include: (1) mixing or dissolving of coating ingredients prior to application; (2) coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; (3) cleaning of coating lines and coating line parts; (4) handling and storage of coatings and solvents; (5) and conveyance and treatment of wastewater. Although they are part of the paper and other web source category, Subpart JJJJ has not set emission limits or other requirements for these affiliated operations. These operations will not be covered by the MOCM or MCM NESHAPs.

Affiliated operations that go beyond those described above may be subject to MOCM or MCM and will be identified as such in the MOCM and MCM rule.

Q3: If a line is added to an existing affected source, is the added line a new source or an existing source?

A3: As long as you do not trigger reconstruction as defined in 63.2, the additional line would be an existing source. Section 63.3300 defines an affected source as the 'collection of all web coating lines' at a facility. As discussed in the preamble to the final rule (67 FR 72332.II.B), a web coating line is defined as any number of workstations. This means that if your facility had at least one web coating line in existence as of the proposed rule date (September 12, 2000), any lines that you add are also classified as part of the existing affected source.

The preamble to the General Provision Amendments (67 FR 16588.II.B.6) published April 5, 2001 provides additional guidance and indicates that EPA has adopted a broader definition of affected source is some instances to provide affected sources more flexibility in apply emission requirements to a larger group of processes, activities and equipment and may thereby facilitate more innovative and economically efficient control strategies.

Q4: The definition of fabric in section 63.3310 does not include cord (e.g., for strapping tape). If the cord is to be used in the same manner as the other fabrics in the definition, is it subject to Subpart JJJJ?

A4: The POWC rule covers the coating of a fabric substrate for pressure sensitive tape and abrasive materials. The definition of fabric in §63.3310 includes non-woven materials. This includes cord and thread. Therefore, if the coating of the cord is for use in pressure sensitive or abrasive materials then it would be covered under subpart JJJJ.

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Q5: The preamble to the final rule (67 FR 72331.II.A and 72332.II.B) and section 63.3300(e) indicate that coil coating is excluded from Subpart JJJJ except for certain flexible packaging coating of metal or metallized substrate (by this we mean that the metal or metallized substrate coating would be covered under Subpart JJJJ, not the Metal Coil Coating NESHAP). Does this exemption include similar metal or metallized web/substrate sensitive tape coating operations or coating of fabric used in flexible packaging?

A5: During the public comment period we became aware of coated metal substrates that meet the definition for metal coil and which are used in flexible packaging. The web coating operations for this type of substrate are part of the POWC source category and were included in the database used to develop the emission limits in subpart JJJJ. Section 63.3300 specifies that web coating lines engaged in the coating of metal webs that are used in flexible packaging are part of the affected source under subpart JJJJ, and not under the Metal Coil NESHAP. The intent of the subpart JJJJ is to cover similar web coating lines. Therefore, web coatings lines that are engaged in the coating of metal webs that are used in pressure sensitive tape are also part of the affected source under subpart JJJJ.

In addition, we also became aware of coating of fabric used in flexible packaging operations and addressed this issue in the newly promulgated Fabric, Printing, Coating and Dyeing NESHAP (Subpart OOOO). In accordance with Section 63.4281 (68 FR 32171, 5/29/03), "Web coating lines specified in paragraphs (d)(1) through (3) of this section are not part of the affected source of this subpart. (1) Any web coating operation that is part of the affected source of subpart JJJJ of this part (national emission standards for hazardous air pollutants for paper and other web coating). This would include any web coating line that coats both a paper and other web substrate and a fabric or other textile substrate for use in flexible packaging, pressure sensitive tape and abrasive materials, or any web coating line laminating a fabric substrate to paper. The intent of the subpart JJJJ is to cover similar web coating lines.

Q6: Section 63.3321 indicates that for any web coating lines where you use an add-on control device (other than solvent recovery where liquid-liquid material balances are performed), you must comply with section 63.3321. Where voluntary control devices are used, must they comply with Subpart JJJJ?

A6: No, voluntary control devices do not have to comply with the requirements in Subpart JJJJ. Voluntary control devices would only be considered voluntary if the affected source is otherwise in compliance. This means that voluntary control devices do not have to comply as long as the affected source demonstrates that JJJJ emission limits under section 63.3370 are met independently of those control devices.

Initial Notification

Q7: Section 63.3400(b)(1) requires that existing affected sources submit an initial notification no later than 1 year before the compliance date. Section 63.3400(b)(2) requires new sources to submit an initial notification in accordance with section 63.9(b). If my affected source began construction after the proposal of Subpart JJJJ (new

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source) but had an initial startup prior to the effective date, when must I submit an initial notification?

A7: You should follow section 63.9(b)(2) if your affected source has an initial startup before the effective date of Subpart JJJJ. Under 63.9(b)(2), you are required to submit an initial notification within 120 calendar days after the effective date (December 4, 2002) or within 120 calendar days after the source becomes subject to the relevant standard. As indicated in the preamble to Subpart JJJJ (67 FR 72334.VI.A), new or reconstructed affected sources must submit their initial notification no later than 120 days after either the date of the initial startup or December 4, 2002, whichever is later.

Q8: Section 63.3400(b)(2) refers to 63.9(b) of Subpart A, General Provisions, for initial notifications for new & reconstructed sources that become subject after the effective date of the standard. Provisions under 63.9(b)(3) that address these types of sources were removed April 5, 2002 with the Final Rule amendments. What requirements for submitting initial notifications must a new or reconstructed source now follow?

A8: Section 63.9(b)(3) of the General Provisions was reserved with publication of the Final Rule Amendments April 5, 2002. New or reconstructed sources should follow 63.9(b)(4) or (5) for their initial notification requirements depending on if the source is required to submit an application for approval of construction or reconstruction under 63.5(d). Major emitting new source that begin construction after the effective date of the standard are required to submit an application of approval of construction or reconstruction as soon as practical before the actual construction and reconstruction begins in accordance with section 63.5(d)(1)(i). Sources not required to submit an application for approval of construction or reconstruction should submit their initial notification in accordance with section 63.5(b)(4). Section 63.5(b)(4) references 63.9(b). Section 63.9(b)(5) requires submittal [checking]

Compliance Options

Q9: In the preamble to the final standard (67 FR72333, III.A) it indicates that the 20 ppm alternative compliance option is available to sources “using a thermal oxidizer.” This would preclude this option from being used for catalytic oxidizers. Section 63.3320(b)(4) of the final rule indicates a more inclusive term “oxidizers.” Can catalytic oxidizers use the 20 ppm option?

A9: Yes catalytic oxidizers may use the 20 ppm compliance demonstration. We did not intend to limit the requirements in section 63.3320(b)(4) when we used the term “thermal” oxidizer in the preamble. We were responding to a specific comment we received on thermal oxidizers. Affected sources that use any type of oxidizer to comply with the emission limits under Subpart JJJJ may use the option to maintain an outlet organic HAP concentration of less than 20ppm by volume by compound on a dry basis option as long as the affected source maintains a capture efficiency of 100% during the covered web-coating operation.

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Capture System Monitoring

Q10: Section 63.3350(f)(5) of the rule requires that facilities must review and update the capture system monitoring plan at least annually. What if no update was necessary?

A10: You may simply document in whatever fashion is appropriate that you have reviewed the plan as required under section 63.3350(f)(5) and no updates were necessary).

Automatic Shutdown Systems

Q11: Section 63.3350(c) requires that if you operate web coating lines with intermittently-controlled work stations, you must monitor bypasses of the control device and the mass of each coating material applied at the work station during any such bypass. Section 63.3350(c)(4) allows for an automatic shutdown system to be used as an option for demonstrating compliance with this requirement. Section 63.3550(c)(4) indicates that the shutdown system must be one in which the web coating line is stopped when the flow is directed away from the control device.

We have two situations where automatic shutdown systems exist. One system will not allow the coating line to operate if the damper position is not in a position where it is vented to a control device while solvent based coatings are applied. The other shuts down the coating line automatically if other parameters such as set point concentration of Lower Explosive Limit (LEL) in a bypass vent line are exceeded. Are these considered "shutdown systems" that meet the intent of section 63.3350(c)(4)?

A11: Yes the two systems described in the above paragraph would be considered automatic shutdown systems as described in § 63.335 (c) (4).

Performance Testing

Q12: Section 63.3360(c) allows a facility to determine organic HAP content using one of the procedures in section 63.3360(c)(1) – (3). Under section 63.3360(c)(1)(i), if you use Method 311, you must include each organic HAP in quantities greater than or equal to 0.1 mass percent for carcinogens and greater than or equal to 1.0 mass percent for other organic Hap compounds, as defined by OSHA. Another compliance option is section 63.3360(c)(3) which allows the use of formulation data to provide information on HAP quantities. Can manufacturers formulation data (based on "as purchased" information) also be used to determine HAP quantities under 63.3360(c)(1)(i) or are these quantities derived from some other means?

A12: Yes, manufacturers formulation data (based on "as purchased" information) can also be used to determine HAP quantities under 63.3360(c)(1)(i). The definition of formulation data in §63.3310 states that Formulation data means data on the organic HAP mass fraction, volatile matter mass fraction, or coating solids mass fraction of a material that is generated by the manufacturer or means other than a test method specified in this subpart or an approved alternative method.

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Q13: Can existing performance test data/operating limits be used to fulfill the requirements for establishing control device efficiency and capture efficiency under sections 63.3360(e), and (f)?

A13: Unless specified in a regulation, the EPA does not generally allow the use of existing or past performance test data to establish operating limits, control device efficiency or capture efficiency. Performance tests associated with the MACTs must be conducted in accordance with the requirements of the applicable Standard. These tests establish that the source is capable of complying with the rule and are used to establish the operating limits that the source will monitor to demonstrate compliance. In addition, it is important to provide an opportunity for state/regional personnel to witness these tests whenever possible. To accept existing or past test data eliminates EPA/state ability to witness the tests and pre-approve test plans. In addition, existing test data may be old and no longer representative of the sources operations. Sources have the ability to request a test waiver under 63.7(h). EPA can consider those requests on a case by case basis.

Startup, Shutdown and Malfunction Plan

Q14: The preamble to the final rule (67 FR 72335.VI.E, 4th bullet) requires you to notify the EPA when the actions taken during a startup, shutdown or malfunction of an emission control device are consistent with the SSM Plan. This is inconsistent with section 63.3400(g).

A14: We did not intend to use the term *consistent* in the preamble of the rule. Startup, shutdown and malfunction (SSM) reports should be submitted in accordance with 63.3400(g) and Table 2 of the rule to determine which General Provision requirements affect you. Under Table 2, sources subject to Subpart JJJJ are also subject to section 63.10(d)(5) of the General Provisions. This section governs the reporting of SSM.

Section 63.10(d)(5)(i) of the General Provisions requires that that if actions taken by an owner or operator during SSM **are consistent** with the procedures specified in the SSMP, the owner or operator shall state such information in the SSM report. As indicated in the preamble (67 FR 72335, E), sources who's actions are consistent with their SSMP may report such actions semiannually.

However, if actions taken are **not consistent** with your SSMP, then the facility must report such actions immediately as required under section 63.3400(g) and 63.10(d)(5). Section 63.10(d)(5)(ii) states that if actions taken by an owner or operator during SSM are not consistent with the procedures specified in the SSMP, the owner or operator must report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan followed by a letter within 7 working days after the end of the event.

Recordkeeping Requirements

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Q15: The compliance date of the rule is December 4, 2005. If we are complying with the monthly average emission limit for "as-applied" coating materials under section 63.3370(a)(2), when is the first monthly compliance demonstration required?

A15: As defined in 63.3310, Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

December 2004 will be your initial monthly compliance period. Although the compliance date for Subpart JJJJ falls after the first of the month, the compliance date still falls within the 28-35 day guideline. Therefore, your initial monthly compliance period will be from December 4, 2005 through December 31, 2005.

Although the rule does not specify by which date you must have your monthly compliance demonstration completed, the Summary of Public Comments and Responses on the Proposed Rule, November 2002, EPA-453/R-02-005, page 2-36 addresses this issue. As the following excerpt from the response to comments indicates, the deadline for compliance demonstration is allowed up to the end of the following month:

> Comment: Given the volume of data and calculations necessary to demonstrate compliance, several commenters … proposed allowing up to the end of the following month as a deadline for when monthly compliance must be demonstrated.
>
> Response: The proposed rule requires that compliance be demonstrated each month (see 63.3370). Because you would need a complete month of data to perform the compliance demonstration calculations, the month must be over before all of these data are available. Thus, the compliance demonstration must be performed during the following month. Because the proposed rule does not specify any requirements in conflict with the commenters' statement, we made no changes to the final rule in response to these comments.

Q16: Section 63.3350(c)(1) requires that the position of the flow control indicator must be logged in hourly when an intermittently controlled work station is applying water based coatings. Why is an hourly reading required?

A16: Section 63.3350(c) requires the monitoring of control device bypasses. Four monitoring options are provided in 63.3350(c)(1)-(4). Section 63.3350(c)(1) provides the option of installation, calibration, operation, maintenance and monitoring of flow control position indicators. Of the monitoring options provided, this device presents a greater potential for the control device to be bypassed. Consequently, this device has the more frequent hourly monitoring requirement. Sections 63.3550(c)(2)-(4) provide other monitoring options that provide greater assurance that the control device will not be bypassed. These devices are required to be monitored once per month.

Reporting Requirements

Q17: In the preamble to the final rule (67 FR 72335.VI.E, second bullet), it indicates that you must report material balance calculations for all months when the material balances

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deviate from the emission limit. If the material balance calculations are being used to determine efficiency of the solvent recovery unit, why must they be reported?

A17: In accordance with section 63.3330(e)(2), if you use liquid-liquid material balance to comply with the emission standard, then you must install a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. You will use these values in your compliance demonstration under section 63.3370(i).

Section 63.3370(i)(1) allows you to show compliance with the emission limit by using a liquid-liquid material balance. If your monthly mass balance calculations show that you do not meet one of the requirements specified in section 63.3370(i)(1)(x), then you have deviated from the requirements of Subpart JJJJ and should report such deviations in your semiannual report.

At a minimum, you should include in your report the final value of your mass-balance calculation and the specific values you used in your calculations. Provide at least one example calculation on how you determined your mass balance using the values you provided in the report.

Semiannual Reports

Q18: Section 63.3400(c) indicates that the first semiannual report for existing sources covers the period beginning on the compliance date and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date. Does this mean the initial compliance report under Subpart JJJJ should include information from December 5 through December 31 (which is the period immediately following the compliance date), or does the initial semiannual report include the first 6 months of compliance information and thus should cover the period from December 5 through June 30?

A18: Semiannual reports should cover a 6 month period of continuous compliance. This means that the first compliance report required under section 63.3400(c)(1) should cover the period between December 5, 2005 and June 30, 2006. The report should be submitted by July 31, 2006. The next semiannual compliance reports would then cover the period between July 1, 2006 and December 31, 2006 with a submittal date of January 31, 2007.

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