

AGENCY OF NATURAL RESOURCES

Waterbury, Vermont

ENVIRONMENTAL PROTECTION REGULATIONS

CHAPTER 5

AIR POLLUTION CONTROL

Subchapter II. Prohibitions

Subsection 5-253.10 Paper Coating

- (a) **Applicability.** This subsection applies to all paper coating units, except that any paper coating unit shall be exempt from this subsection that is within a paper coating source that has actual emissions without control devices from all paper coating units within the source of less than 15 lbs of volatile organic compounds per day. Once a source becomes subject to this subsection, it shall remain so even if emission levels subsequently fall below the applicability threshold.
- (b) **Definitions.** For the purpose of this subsection, the following definitions apply, in addition to those of Section 5-101 of this chapter.

"Knife coating" means the application of a coating material to a substrate beneath a knife that spreads the coating evenly the full width of the substrate.

"Paper coating line" means a web coating line where coating is applied to paper. Products produced on a paper coating line include, but are not limited to, adhesive tapes and labels, book covers, post cards, office copier paper, drafting paper and pressure sensitive tapes. Paper coating lines include, but are not limited to, application by impregnation or saturation or by the use of roll, knife or rotogravure coating. Printing presses are not considered paper coating lines.

"Paper coating unit" means a coating application station and its associated flashoff area, drying area and/or oven, where coating is applied and dried or cured on a paper coating line. A paper coating line may include more than one paper coating unit.

"Roll coating" means the application of a coating material to a moving substrate by means of hard rubber, elastomeric or metal rolls.

"Rotogravure coating" means the application of a coating material to a substrate by means of a roll coating technique in which the pattern to be applied is recessed relative to the non-image area, and the coating material is picked up in these recessed areas and is transferred to the substrate.

"Substrate" means the surface onto which a coating is applied or into which a coating is impregnated.

"Web coating line" means all of the coating applicators, drying areas or ovens located between an unwind station and a rewind station, that are used to apply coating onto a continuous strip of substrate (the web). A web coating line need not have a drying oven.

(c) Standards.

- (1) An owner or operator of a paper coating unit subject to this subsection shall not cause, allow or permit the application of any coating on that unit with a VOC content in excess of 2.9 pounds per gallon of coating, (excluding water and exempt compounds), as applied; or
- (2) An owner or operator of a paper coating unit subject to this subsection shall not apply, during any day, coatings on that unit whose daily-weighted average of VOC content, calculated in accordance with methods specified by the Air Pollution Control Officer, exceeds the emission limit in paragraph (c)(1) of this subsection.

(d) Control devices.

- (1) As an alternative to compliance with the emission limits in paragraph (c) of this subsection, an owner or operator of a paper coating unit may comply with this subsection by:
 - (i) Installing and operating a capture system and control device on that unit; and
 - (ii) Demonstrating that the overall emission reduction efficiency achieved for that unit is greater than or equal to the required overall emission reduction efficiency. The achieved and the required overall emission reduction efficiencies shall be determined in accordance with procedures and test methods specified by the Air Pollution Control Officer.
- (2) An owner or operator of a paper coating unit subject to this subsection shall ensure that:

- (i) A capture system and control device, if used, are operated at all times that the coating unit is in operation, and the owner or operator demonstrates compliance with this subsection in accordance with the coating analysis and capture system and control device efficiency test methods specified by the Air Pollution Control Officer; and
 - (ii) The control device is equipped with the monitoring equipment required by the Air Pollution Control Officer, and such equipment is installed, calibrated, operated and maintained according to the vendor's specifications at all times the control device is in use. The monitoring equipment shall monitor the following parameters:
 - (A) Combustion chamber temperature of each thermal incinerator or afterburner;
 - (B) Temperature rise immediately before the catalyst bed and across each catalytic incinerator bed; and
 - (C) The VOC concentration of the outlet from each carbon adsorption bed.
- (e) Record keeping and reporting.
- (1) The owner or operator of a coating unit complying with paragraph (c) of this subsection by means of the use of complying coatings shall collect and record all of the following information each day for each coating unit and maintain the information at the source for a period of 5 years:
 - (i) The name and identification number of each coating, as applied, on each coating unit; and
 - (ii) The mass of VOC per volume of each coating (excluding water and exempt compounds) as applied used each day on each coating unit.
 - (2) The owner or operator of any coating unit complying with this subsection by the use of control devices shall perform such compliance testing, keep such records and furnish such reports as required by the Air Pollution Control Officer to demonstrate continuing compliance with this subsection.