



MECKLENBURG COUNTY  
Land Use and Environmental Services Agency  
*-AIR QUALITY-*

April 9, 2024

<Issued Via Email>

Alexandre Coat, Plant Manager  
Transcontinental Matthews  
700 Crestdale Road,  
Matthews, NC 28105  
[alexandre.cote@tc.tc](mailto:alexandre.cote@tc.tc)

RE: Air Quality Permit to Construct/Operate No. 24-01V-001

Dear Alexandre Coat:

In accordance with your application dated May 1, 2023, and information on file, Mecklenburg County Air Quality (MCAQ) forwards herewith Permit to Construct/Operate (Permit) No. 24-01V-001 for the construction/operation of air pollution emission sources or abatement equipment. This permit is being issued to fulfill the 5-year permit renewal requirement under the Title V regulations.

Review the permit and attached enclosures carefully. Please note the following:

- **Facility Category:** The category for this facility is "Title V." This category is based on the information supplied to MCAQ and is used to determine appropriate annual and application processing fees.
- **Permit Expiration:** This Permit expires on April 9, 2029. In accordance with Mecklenburg County Air Pollution Control Ordinance Regulation 1.5513 - "Permit Renewal and Expiration," the expiration of a Title V permit terminates a facility's right to operate unless a complete renewal application has been submitted at least six months before the date of permit expiration. To ensure the next renewal application is timely and complete, the application shall be submitted one year prior to the permit expiration date, thus due to MCAQ on April 9, 2028.
- **Permit Conditions and Limitations:** Part 1 of this Permit contains Facility Conditions and Limitations, which are applicable to your facility. Part 2 of this Permit contains Emission Source Conditions and Limitations, which are applicable to emission sources as identified in the Emission Source Table.
- **Performance Testing Requirements:** This permit requires performance testing of Coating Emission Sources and the associated Thermal Oxidizer control device in accordance with Condition and Limitation No. C-26.

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- **Appendix A** contains information related to toxic air pollutants emissions at your facility. Please refer to Part 1, Condition and Limitation B-5 of this Permit and/or Part 2, Condition and Limitations D-2 and D-3 to comply with the air toxics requirement.
  - **Attachment 1** contains commonly used abbreviations and acronyms
  - **Attachment 2** contains operational parameters as determined during the most recent stack test. These parameters are necessary to demonstrate compliance with regulatory requirements.
  - This Permit is transferable to future owners and operators only through action of the Director of MCAQ and shall be subject to the conditions and limitations as specified therein.

If any new or revised parts, requirements, or limitations contained in this Permit are unacceptable to you, you have the right to a hearing before the Air Quality Commission upon written demand to the Director within thirty (30) days following receipt of this Permit. The hearing request must identify the specific issues to be contended as described in MCAPCO Regulation 1.5306 - "Hearings," Paragraph (b). Unless such demand is made, this Permit shall be final and binding.

If there are any questions regarding this matter, please do not hesitate to contact me at 704/336-5430.

Sincerely,



Donna Cavaliere  
Sr. Air Quality Specialist

DSC:smh

Enclosures (4)  
Permit No.24-01V-001  
Appendix A  
Attachment 1  
Attachment 2

Cc: Jerry Manus, EHS Coordinator, Transcontinental Matthews, [Jerry.Manus@tc.tc](mailto:Jerry.Manus@tc.tc)



## AIR QUALITY TITLE V PERMIT

Permit No.	Effective Date	Expiration Date	Modification Date(s)	Replaces Permit No(s)
24-01V-001	April 9, 2024	April 9, 2029		19-01V-001

In accordance with the provisions of the Mecklenburg County Air Pollution Control Ordinance, and by the authority granted under the North Carolina General Statute (NCGS) Chapter 143, Article 21B, and until such time as this permit expires or is modified or revoked, the Permittee is hereby authorized to construct/operate emission sources and control devices as outlined in Parts 1 and 2 of this permit. The purpose of this permit is to assure compliance with the requirements of Title V of the Clean Air Act (CAA) and 40 CFR Part 70.

**Permittee Name:** Transcontinental AC US LLC

**Site Name (if different):** Transcontinental Matthews

**Permitted Facility Location:** 700 Crestdale Rd

**City, State, Zip:** Matthews, NC 28105

**Facility Mailing Address:** 700 Crestdale Rd

**City, State, Zip:** Matthews, NC 28105

**Primary SIC Code:** 3083, 3081

**Renewal Application Due:** April 9, 2028

A handwritten signature in blue ink that reads "Jason Rayfield".

04/09/2024

Program Manager, Air Quality Program

## **PERMIT CONTENTS**

### **PART 1 - FACILITY CONDITIONS AND LIMITATIONS**

#### **A. LOCAL AND FEDERAL REQUIREMENTS**

##### **ADMINISTRATIVE PROVISIONS**

- A-1 Applicability
- A-2 Permit Application
- A-3 General Duties and Powers of the Director
- A-4 Confidential Information
- A-5 Retention of Permit
- A-6 Property Rights
- A-7 Annual Fee Payment
- A-8 Inspection and Entry

##### **PERMIT CHANGES**

- A-9 Changes Not Requiring A Permit
- A-10 Permit Modifications and Administrative Amendments
- A-11 Reopening for Cause
- A-12 Termination, Modification, Revocation of Permits
- A-13 Permit Renewal and Expiration

##### **NOTIFICATIONS AND REPORTS**

- A-14 Commencement of Operation
- A-15 Malfunction and Excess Emissions Provisions
- A-16 Monitoring Data Recordkeeping and Reporting
- A-17 Annual Emissions Reporting
- A-18 Duty to Provide Information
- A-19 Submissions
- A-20 Information Submittal

##### **OPERATIONAL REQUIREMENTS/STANDARDS**

- A-21 Equipment and Control Device Operation
- A-22 National Emission Standards for Hazardous Air Pollutants
- A-23 Visible Emissions
- A-24 Dust and Related Material

- A-25 Fugitive Dust Emission Sources
- A-26 Protection of Stratospheric Ozone
- A-27 Chemical Accident Prevention Provisions
- A-28 Insignificant Activities
- COMPLIANCE PROVISIONS**
- A-29 Duty to Comply with this Permit
- A-30 Enforcement/Variance/Judicial Review
- A-31 Duty to Comply with Other Regulations
- A-32 Determination of Compliance
- A-33 Compliance Certification
- A-34 Permit Shield
- A-35 Severability Clause
- A-36 Enforcement Clause

**B. LOCAL ONLY REQUIREMENTS**

- B-1 Incorrect Information and Facility Operation
- B-2 Violations Prior to Effective Permit Date
- B-3 Operation and Maintenance Reports
- B-4 Violation of Terms or Conditions
- B-5 Toxic Air Pollutants
- B-6 Nuisance
- B-7 Odorous Emissions
- B-8 Start-up and Shut-down Excess Emissions Provisions

**PART 2 - EMISSION SOURCE CONDITIONS AND LIMITATIONS**

**C. LOCAL AND FEDERAL REQUIREMENTS**

- C-1 Particulates from Fuel Burning Indirect Heat Exchangers
- C-2 Particulates from Miscellaneous Industrial Processes
- C-3 Sulfur Dioxide Emissions from Combustion Sources
- C-4 Work Practices for Sources of Volatile Organic Compounds
- C-5 Maximum Achievable Control Technology for Boilers and Process Heaters (Subpart 5D)
- C-6 Maximum Achievable Control Technology for Magnetic Tape Manufacturing Operations (Subpart 2E)
- C-7 Maximum Achievable Control Technology for Organic Liquids Distribution (Subpart 4E)

- C-8 Maximum Achievable Control Technology for Paper and Other Web Coating (Subpart 4J)
- C-9 Maximum Achievable Control Technology for Printing, Coating, and Dyeing of Fabrics and Other Textiles (Subpart 4O)
- C-10 Maximum Achievable Control Technology for Stationary Reciprocating Internal Combustion Engines (Subpart 4Z)
- C-11 Reasonably Available Control Technology for Paper, Film and Foil Coatings (2.0966)
- C-12 New Source Performance Standards for Steam Generating Units (Subpart Dc)
- C-13 New Source Performance Standards for Flexible Vinyl and Urethane Coating and Printing (Subpart 3F)
- C-14 New Source Performance Standards for Magnetic Tape Coating Facilities (Subpart 3S)
- C-15 New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities (Subpart 3V)
- C-16 Prevention of Significant Deterioration Avoidance
- C-17 Sources in Nonattainment Areas Avoidance
- C-18 Sources in Nonattainment Areas Avoidance
- C-19 Sources in Nonattainment Areas Lowest Achievable Emission Rate
- C-20 Overall Control Efficiency Requirements
- C-21 Monitoring and Recordkeeping Requirements
- C-22 Concurrent Operation – Excess Emission Reporting and Malfunctions
- C-23 Concurrent Operation – New Source Performance Standards
- C-24 Concurrent Operation – Maximum Achievable Control Technology
- C-25 Alternative Operating Scenarios
- C-26 Performance Test Requirements
- C-27 Determination of VOC Control System Efficiency
- C-28 Notification and Reporting Requirements

**D. LOCAL ONLY REQUIREMENTS**

- D-1 Permit Voided
- D-2 Toxic Air Pollutant Procedures
- D-3 Notification and Reporting Requirements

**Appendix A Toxic Air Pollutant Review**

**ATTACHMENTS**

- Attachment 1** Commonly Used Abbreviations and Acronyms
- Attachment 2** Operational Parameters

# **PART 1**

## **Facility Conditions and Limitations**

# PART 1

## Facility Conditions and Limitations

The entire facility is subject to the conditions and limitations contained in Part 1 (below). The facility shall comply with all applicable Air Quality rules and regulations whether or not these regulations are specifically identified in the permit.

### **A. LOCAL AND FEDERAL REQUIREMENTS**

Mecklenburg County Air Quality (MCAQ) and the United States Environmental Protection Agency (EPA) have the authority to enforce the terms, conditions, and limitations contained in this section.

### **ADMINISTRATIVE PROVISIONS**

#### **A-1. Applicability**

The facility shall be operated in accordance with the Mecklenburg County Air Pollution Control Ordinance (MCAPCO) **Regulations 1.5211 - “Applicability”** and **1.5502 - “Applicability”**. An owner or operator shall have received a permit from the Department and shall comply with the conditions of such permit before constructing, modifying or operating any air pollution source or entering into a contract to construct or install any air cleaning device. This permit does not relieve the facility from the responsibility of acquiring any other permits that may be required.

#### **A-2. Permit Application**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(16)**, the construction and operation of emission sources and control devices listed in this permit shall be in accordance with all plans, specifications, operating parameters, and other information submitted and which is the basis for the issuance of this permit. The facility shall comply with all applicable Air Quality rules and regulations whether or not these rules and regulations are included as part of the permit.

Applications shall be submitted in accordance with **MCAPCO Regulations 1.5212 - “Applications”, 1.5505 - “Application Submittal Content”, and 1.5507 - “Applications”** and shall be accompanied by the appropriate fee as listed in **MCAPCO Regulation 1.5231 - “Air Quality Fees”**. The owner or operator of a new or modified facility may choose to obtain a construction and operation permit pursuant to **MCAPCO Regulation 1.5504 - “Option for Obtaining Construction and Operation Permit”**.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#### **A-3. General Duties and Powers of the Director**



In accordance with **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, with Approval of the Board”**, the Director or his authorized representative may request performance testing of any emission source to ensure compliance.

**A-4. Confidential Information**

In accordance with **MCAPCO Regulation 1.5217 - “Confidential Information”**, the Permittee may request that submitted information be treated as confidential. The Permittee must make this request at the time of submittal and include both confidential and public copies of the information for MCAQ files.

**A-5. Retention of Permit**

In accordance with **MCAPCO Regulation 1.5219 - “Retention of Permit at Permitted Facility”**, a copy of this permit shall be retained at the facility.

**A-6. Property Rights**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(8)**, this permit does not convey property rights of any sort, or any exclusive privileges.

**A-7. Annual Fee Payment**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(10)**, the Permittee shall pay fees required by **MCAPCO Regulation 1.5231 - “Air Quality Fees”**.

**A-8. Inspection and Entry**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Paragraph (I)**, the Permittee shall allow authorized representatives of MCAQ and the EPA to:

- a. enter the Permittee’s premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept by the conditions of the permit;
- b. have access to and copy any records that are required to be kept by the conditions of the permit;
- c. inspect any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by the permit; and
- d. sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

## **PERMIT CHANGES**

### **A-9. Changes Not Requiring a Permit Modification**

a. Section 502(b)(10) Changes:

Changes allowed under Section 502(b)(10) of the federal Clean Air Act are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. In accordance with **MCAPCO Regulation 1.5523 - “Changes Not Requiring Permit Revisions”** Paragraph (a), the Permittee may make changes without having this permit revised if:

1. the changes are not a modification as defined pursuant to **MCAPCO Article 2.0000** or Title I of the federal Clean Air Act;
2. the changes do not cause the allowable emissions in the permit to be exceeded;
3. the Permittee notifies the Director and EPA (EPA Region 4, attn: Air and Radiation Division - Air Permits Section, 61 Forsyth Street SW, Atlanta, GA 30303 or through the electronic CEDRI system) in writing as described in **MCAPCO Regulation 1.5523- “Changes Not Requiring Permit Revisions”** Subparagraph (a)(2) at least seven days before the change is made; and,
4. the Permittee shall attach the notice to the relevant permit.

b. Off-Permit Changes:

In accordance with **MCAPCO Regulation 1.5523 - “Changes Not Requiring Permit Revisions”** Paragraph (b), the Permittee may make changes in his operation or emissions without revising the permit if:

1. the change affects only insignificant activities and the activities remain insignificant after the change,
2. the change is not covered by any applicable requirement, and,
3. the change would not render existing permit compliance terms and conditions irrelevant.

c. Emissions Trading:

To the extent that emissions trading is allowed pursuant to **MCAPCO Article 2.0000**, emissions trading shall be allowed without permit revisions provided that:

1. all applicable requirements are met,
2. the Permittee complies with all terms and conditions of the permit in making the emissions trade, and,
3. the Permittee notifies the Director and EPA with written notification as described in **MCAPCO Regulation 1.5523 - “Changes Not Requiring Permit Revisions”** Subparagraph (c)(3) at least seven days before making the emissions trade.

### **A-10. Permit Modifications and Administrative Amendments**

a. Administrative Permit Amendments shall be made in accordance with **MCAPCO Regulation 1.5514 - “Administrative Permit Amendments”**.

b. Transfer of Ownership or Operation:

Transfer of ownership or operations shall be made in accordance with **MCAPCO Regulation 1.5524 - “Ownership Change”** which states that applications for ownership change shall contain information as required in **MCAPCO Regulation 1.5505 -**

**“Application Submittal Content” Paragraph (4)** and shall follow the procedures described in **MCAPCO Regulation 1.5212 - “Applications” Paragraph (e)**.

- c. Minor Permit Modifications shall be made in accordance with **MCAPCO Regulation 1.5515 - “Minor Permit Modifications”**.
- d. Significant Permit Modifications shall be made in accordance with **MCAPCO Regulation 1.5516 - “Significant Permit Modification”**.

#### **A-11. Reopening for Cause**

In accordance with **MCAPCO Regulation 1.5517 - “Reopening for Cause”, Paragraph (a)**, a permit shall be reopened and revised under the following circumstances:

- a. additional requirements become applicable to a facility with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement, and no such reopening is required if the effective date of requirement is later than the expiration date of this permit;
- b. MCAQ or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- c. MCAQ or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

#### **A-12. Termination, Modification, Revocation of Permits**

A permit may be terminated, revoked, or modified as outlined in **MCAPCO Regulations 1.5232 - “Issuance, Revocation, and Enforcement of Permits”, 1.5231 - “Air Quality Fees”, and/or 1.5519 - “Termination, Modification, Revocation of Permits”**.

In accordance with the above-referenced regulations, MCAQ may terminate, modify, or revoke and reissue a permit if:

- a. the information contained in the application or presented in support thereof is determined to be incorrect;
- b. the regulations or conditions under which the permit or permit renewal was granted have changed;
- c. permit conditions have been violated;
- d. construction of the permitted equipment does not commence within 18 months of permit issuance or, once construction has begun, it ceases prior to completion for a period of 18 consecutive months;
- e. operation of a permitted facility or process ceases permitted activities for a period of 18 consecutive months;
- f. the permit holder fails to pay fees required within 30 days after being billed;
- g. the Permittee refuses to allow the Director or authorized representative to enter the premises where a source of emissions is located, have access to records required to be kept by the terms and conditions of the permit, inspect any source of emissions, control equipment, and monitoring equipment or methods required in the permit, or collect samples from any emission source; or,
- h. the EPA requests that the permit be revoked pursuant to **40 CFR Part 70.7 (g) or 70.8(d)**.

#### **A-13. Permit Renewal and Expiration**

In accordance with **MCAPCO Regulation 1.5513 - “Permit Renewal and Expiration”**, permit expiration shall terminate the facility’s right to operate unless a complete renewal application has been submitted at least six months before the date of permit expiration. To ensure the application is timely and complete, the *renewal application shall be submitted one year prior to the permit expiration date*. The renewal application should include the complete application forms for all permitted equipment and any modifications. Permits being renewed are subject to the procedural requirements of **MCAPCO Section 1.5500 - “Title V Procedures”**, including those for public participation and affected States and EPA review. Upon receipt of a timely and complete application for renewal, the Permittee may continue to operate under the conditions of this permit, subject to final action by MCAQ on the renewal application. If a complete renewal application is not received as required, the permit will expire at the end of its term.

## **NOTIFICATIONS AND REPORTS**

### **A-14. Commencement of Operation**

The facility shall be operated in accordance with **MCAPCO Regulation 1.5214 - “Commencement of Operation”**. Upon completion of construction, alteration or installation pursuant to this permit, the permit holder shall notify the Director in writing of such completion and of the holder’s intent to commence operation.

### **A-15. Malfunction and Excess Emissions Provisions:**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content”** Subparagraph (f)(2), the Permittee shall report malfunctions, emergencies, and other upset conditions promptly as prescribed in **MCAPCO Regulations 2.0524 - “New Source Performance Standards”**, **2.0535 - “Excess Emissions Reporting and Malfunctions”** (except Paragraph (g)), **2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, or **2.1111 - “Maximum Achievable Control Technology”**.

The permittee shall report to the Director within two business days after becoming aware of any deviation not covered by **MCAPCO Regulations 2.0524 - “New Source Performance Standards”**, **2.0535 - “Excess Emissions Reporting and Malfunctions”** (except Paragraph (g)), **2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, or **2.1111 - “Maximum Achievable Control Technology”**.

All reports of deviations and excess emissions shall be certified by a responsible official. After a malfunction or breakdown has been corrected, the Director may require the source to conduct a performance test to demonstrate compliance.

*MCAPCO Regulation 2.0535 – “Excess Emissions Reporting and Malfunctions” Paragraph (g) is not a SIP enforceable provision and therefore the conditions and allowances allowed therein are considered as Local only requirements (see Facility Condition and Limitation No. B-8).*

### **A-16. Monitoring Data Recordkeeping and Reporting**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Paragraph (f):**

- a. The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. (Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.)
- b. The Permittee shall submit reports of any required monitoring as listed in Part 2 of this Permit to MCAQ at least every six months. The reports should include a summary of data and observations, identification of any deviations from normal operating parameters, and any corrective action taken to return the monitored emission source to normal operating conditions. Normal operating parameters shall be determined from information on file and any operating ranges listed in Part 2 of this permit.

**A-17. Annual Emissions Reporting**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(14)**, the Permittee shall submit annual reports of actual and potential emissions as required pursuant to **MCAPCO Regulation 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”** and as specified in the Permit.

**A-18. Duty to Provide Information**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(9)**, the Permittee shall furnish to MCAQ, in a timely manner, any information that MCAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The Permittee shall furnish to MCAQ copies of records required to be kept by the permit when such copies are requested by the Director.

**A-19. Submissions**

In accordance with **MCAPCO Section 1.5500 - “Title V Procedures”**, any document submitted shall be certified by a responsible corporate official as being true, accurate and complete. Reports, test data, monitoring data, notifications and requests for renewal shall be submitted to:

Director  
Mecklenburg County Air Quality  
2145 Suttle Avenue  
Charlotte, NC 28208-5237

**A-20. Information Submittal**

In accordance with **MCAPCO Regulation 1.5111 – “General Recordkeeping, Reporting and Monitoring Requirements”**, the owner or operator shall submit all reports or information as may be required by MCAQ.

**OPERATIONAL REQUIREMENTS/STANDARDS**

**A-21. Equipment and Control Device Operation**

In accordance with **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, with Approval of the Board”** and unless otherwise specified by this permit, no equipment may be operated without the concurrent operation of the permitted air emissions control devices.

**A-22. National Emission Standards for Hazardous Air Pollutants**

The facility shall be operated in accordance with **MCAPCO Regulation 2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, which refers to Title 40 of the Code of Federal Regulations Part 61.140 to 61.157, Subpart M, National Emission Standard for Asbestos, when conducting any renovation or demolition activities.

**A-23. Visible Emissions**

The facility shall be operated in accordance with **MCAPCO Regulation 1.5107 - “Control and Prohibition of Visible Emissions”**, such that visible emissions shall not be more than 20% opacity for an aggregate of more than six (6) minutes in any one hour or more than twenty (20) minutes in any 24-hour period.

Facilities subject to a visible emission standard as specified by applicability to **MCAPCO Regulations 2.0524 - “New Source Performance Standards”**, or **2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, shall comply with the more stringent standard, but, in no case shall the source’s visible emissions exceed 20% opacity.

**A-24. Dust and Related Material**

The facility shall be operated in accordance with **MCAPCO Regulation 1.5108 - “Dust and Related Material”**, such that dust shall not be discharged into the atmosphere in such quantities that the ambient air quality standards are exceeded at the property line or in such quantities or of such toxic or corrosive nature that may be injurious to humans or animals or may cause damage to the property of others.

**A-25. Fugitive Dust Emission Sources**

As required by **MCAPCO Regulation 2.0540 - “Particulates from Fugitive Dust Emission Sources”**, the permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints.

- a. If fugitive dust emissions cause or contribute to substantive complaints, the permittee shall:
  1. within 30 days upon receipt of written notification from the Director of a second substantive complaint in a 12-month period, submit to the Director a written report that includes the identification of the probable source(s) of the fugitive dust emissions causing complaints and what immediate measures can be made to abate the fugitive emissions;
  2. within 60 days of the initial report submitted under Subparagraph (1) of this Paragraph, submit to the Director a control plan as described in Paragraph (f) of this Regulation; and
  3. within 30 days after the Director approves the plan, be in compliance with the plan.
- b. The Director may require that the permittee develop and submit a fugitive dust control plan as described in MCAPCO 2.0540(f) if:

1. ambient air quality measurements or dispersion modeling as provided in Paragraph (e) of MCAPCO Regulation 2.1106 – “Determination of Ambient Air Concentrations” show violation or potential for a violation of an ambient air quality standard for particulates in MCAPCO Section 2.0400 - “Ambient Air Quality Standards”; or
2. if MCAQ observes excessive fugitive dust emissions from the facility beyond the property boundaries for six minutes in any one hour using Reference Method 22 in 40 CFR 60, Appendix A.

#### **A-26. Protection of Stratospheric Ozone**

In accordance with **MCAPCO Regulation 1.5501 - “Purpose of Section and Requirement for a Permit” Paragraph (d)**, the Permittee is subject to all the applicable requirements and standards for recycling and emissions reduction pursuant to:

- a. **40 CFR Part 82, Subpart F - “Recycling and Emissions Reduction”** including the following:
  1. persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant **40 CFR 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 **40 CFR 82.158**;
  3. persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to **40 CFR 82.161**;
  4. persons disposing of small appliances, motor vehicle air conditioners (MVACs), and MVAC-like appliances (as defined in **40 CFR 82.152**) must comply with recordkeeping requirements pursuant to **40 CFR 82.166**;
  5. persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to **40 CFR 82.156**; and
  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 **40 CFR 82.166**; and,
- b. **40 CFR Part 82, Subpart B - “Servicing of Motor Vehicle Air Conditioners”**, if the facility maintains, services, repairs, or disposes of MVACs.

#### **A-27. Chemical Accident Prevention Provisions**

In accordance with **40 CFR Part 68.215 - “Permit Content and Air Permitting Authority or Designated Agency Requirements”**, any stationary source subject to the Chemical Accident Prevention Provisions of **40 CFR Part 68** shall comply with such provisions, including but not limited to the submittal of a Risk Management Plan (Subpart G) .

#### **A-28. Insignificant Activities**

The facility shall be operated in accordance with **MCAPCO Regulation 1.5508 - “Permit Content”, Subparagraphs (i)(15) and (i)(16)** such that all insignificant activities as defined in **MCAPCO Regulation 1.5503 - “Definitions”** shall be included in the permit and shall comply with any applicable requirement in MCAPCO.

## **COMPLIANCE PROVISIONS**

### **A-29. Duty to Comply with this Permit**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(3)**, noncompliance with any term, condition, or limitation of this permit is grounds for enforcement action; for permit termination, revocation and reissuance or modification; or for denial of a permit renewal application.

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(4)**, a Permittee shall not claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit as a defense in an enforcement action.

### **A-30. Enforcement/Variances/Judicial Review**

Violation of any applicable MCAPCO regulation or condition listed herein could result in administrative fines and/or legal action as prescribed in **MCAPCO Section 1.5300 - “Enforcement; Variances; Judicial Review”**.

### **A-31. Duty to Comply with Other Regulations**

In accordance with **MCAPCO Section 1.5100 – “General Provisions and Administration”**, this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or local water quality or land quality control authority.

### **A-32. Determination of Compliance**

In accordance with **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, with Approval of the Board”**, this permit contains provisions which require a specific test method, monitoring, or recordkeeping to be used as a demonstration of compliance with permit limits, but are not intended as the only means of demonstration or certifying compliance with permit limits. Unless otherwise specified, the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance. Compliance with MCAPCO, including the specific conditions herein, shall be determined by source testing, surveillance, visual observations, data review, plant inspections, and any other credible evidence.

### **A A-33. Compliance Certification**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Paragraph (n)**, the Permittee shall submit to MCAQ and EPA by April 30 of each year, a compliance certification by a responsible official with all terms and conditions in the permit, including emissions limitations, standards, and work practices. The certification shall specify:

- a. the identification of each term or condition of the permit that is the basis of the certification;



- b. the compliance status as shown by monitoring data and other information reasonably available to the Permittee;
- c. whether compliance was continuous or intermittent;
- d. the methods used for determining the compliance status of the source, currently and over the reporting period; and,
- e. such other facts as the permit may specify to determine the compliance status of the source.

The compliance certification shall identify each deviation and take it into account in the compliance certification. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the federal Clean Air Act.

All compliance certifications shall be submitted to MCAQ and the EPA either through the electronic CEDRI system found at <https://cdx.epa.gov/> or by US Mail to the following addresses:

Director	and	Environmental Protection Agency
Mecklenburg County Air Quality		attn: Enforcement and Compliance Assurance Division, Air Enforcement Branch
2145 Suttle Avenue		Atlanta Federal Center
Charlotte, NC 28208-5237		61 Forsyth Street, SW
		Atlanta, GA 30303-3104

In accordance with **MCAPCO Regulation 1.5520 - “Certification by Responsible Official”**, a responsible official shall certify the truth, accuracy, and completeness of the compliance certification. The certification shall state that, based on information and belief formed after reasonable inquiry, statements and information in the document are true, accurate, and complete.

#### **A-34. Permit Shield**

In accordance with **MCAPCO Regulation 1.5512 - “Permit Shield and Application Shield”**, and pursuant to the terms, conditions, and limitations of this permit, the facility shall be deemed in compliance with all applicable requirements as of the date of permit issuance except as follows:

- a. This permit shield shall not apply to any change made at this facility that does not require a permit revision.
- b. This permit shield shall not extend to minor permit modifications made pursuant to **MCAPCO Regulation 1.5515 - “Minor Permit Modifications”**.
- c. Nothing in this permit shall alter or affect:
  - 1. the power of the Director, Mecklenburg County Air Quality under NCGS 143-215.112 or MCAPCO or EPA under Section 303 of the federal Clean Air Act;
  - 2. the liability of an owner or operator of a facility for any violation of applicable requirements prior to or at the time of permit issuance;
  - 3. the applicable requirements under Title IV; or
  - 4. the ability of MCAQ (or EPA pursuant to Section 114 of the federal Clean Air Act) to obtain information to determine compliance of the facility with its permit.

**A-35. Severability Clause**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(2)**, the provisions of this permit are severable. Upon any administrative or judicial challenge, or if any provision of this permit is held invalid, all permit requirements, except those being challenged, will remain valid and enforceable.

**A-36. Enforcement Clause**

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(3)**, noncompliance with any condition of the permit is grounds for enforcement action. In addition, noncompliance with any condition may result in permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(4)**, the Permittee may not use as a defense 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 this permit.

**B. LOCAL ONLY REQUIREMENTS**

Only Mecklenburg County Air Quality (MCAQ) has the authority to enforce the terms, conditions, and limitations contained in this section. The EPA does not have the authority to enforce the terms, conditions, and limitations contained in this section.

**B-1. Incorrect Information and Facility Operation**

This permit is subject to revocation or modification by MCAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

**B-2. Violations Prior to Effective Permit Date**

This issuance of this permit in no way absolves the Permittee of liability for any potential legal action and/or penalties which may be assessed for violations of local regulations which have occurred prior to the effective date of this permit.

**B-3. Operation and Maintenance Reports**

Reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Director, Mecklenburg County Air Quality at such intervals and in such form and detail as may be required by MCAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.

**B-4. Violation of Terms or Conditions**

A violation of any Locally enforceable term or condition of this permit shall subject the Permittee to enforcement pursuant to **MCAPCO Section 1.5300 - “Enforcement; Variances; Judicial Review”**, including assessment of civil penalties.

**B-5. Toxic Air Pollutants**

In accordance with **MCAPCO Section 1.5700 - “Toxic Air Pollutant Procedures”** and/or **MCAPCO Regulation 2.1104 - “Toxic Air Pollutant Guidelines”**, the toxic air pollutants (TAP) emitted by existing processes have been reviewed for regulatory applicability by MCAQ. If applicable, Appendix A lists the relevant permits and associated TAPs.

In accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”**, **2.0605 – “General Recordkeeping and Reporting Requirements”**, and/or **2.0903 - “Recordkeeping: Reporting: Monitoring”**, the facility shall report any process additions, modifications or deletions which affect the emissions of any TAP listed in **MCAPCO Section 1.5700 - “Toxic Air Pollutant Procedures”** as prescribed by the following:

- a. If the process modifications will result in a facility-wide TAP emission rate that exceeds the rate listed in **MCAPCO Regulation 1.5711 – “Emission Rates Requiring a Permit”** for any TAP, apply and receive an air toxics permit before the process modification occurs; or
- b. If the process modifications will result in facility-wide TAP emission rates that are below the rates listed in **MCAPCO Regulation 1.5711 - “Emission Rates Requiring a Permit”**, submit the new emission rates to MCAQ 15 days prior to the initial change; or
- c. If the process modifications will not result in a net TAP emission increase, provide MCAQ with demonstration (15 days prior to the initial change) that the proposed modification will not result in a net TAP emission increase at the facility.

The facility is required to maintain documentation such that upon request by MCAQ, the facility can make a demonstration that facility-wide emissions of TAPs have or have not exceeded the rates listed in **MCAPCO Regulation 1.5711**.

**B-6. Nuisance**

The facility shall be operated in accordance with **MCAPCO Regulation 1.5109 - “Nuisance”**. The source shall not discharge any air contaminants or other material to cause injury, detriment, nuisance, annoyance, or endanger the comfort, repose, health or safety of the public or property.

**B-7. Odorous Emissions**

The facility shall be operated in accordance with **MCAPCO Regulation 1.5110 - “Control and Prohibition of Odorous Emissions”**. The owner or operator of a facility shall not operate the facility without implementing management practices or

installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

If the Director determines that a source or facility is emitting an objectionable odor, the owner or operator shall be responsible for:

- providing the maximum feasible control determination according to the procedures in **MCAPCO Regulation 1.5113 - "Determination of Maximum Feasible Controls for Odorous Emissions"**, and
- implementing maximum feasible controls for the control of odorous emissions.

**B-8. Start-up and Shut-down Excess Emissions Provisions**

In accordance with **MCAPCO Regulation 2.0535 – "Excess Emissions Reporting and Malfunctions"** Paragraph (g), excess emissions during start-up and shut-down shall be considered a violation, if the owner or operator cannot demonstrate that the excess emissions are unavoidable. The Director shall determine if excess emissions are unavoidable considering the items listed in this Regulation. The owner or operator shall operate the source and control and monitoring equipment in a manner to minimize emissions during start-up and shut-down.

# **PART 2**

## **Emission Source Conditions and Limitations**

## PART 2

### Emission Source Conditions and Limitations

In accordance with MCAPCO Section 1.5500 -"Title V Procedures", the facility shall comply with all applicable rules and regulations whether or not these rules and regulations are specifically identified in the permit. The emission sources and control devices listed in the following table are subject to the Emission Source Conditions and Limitations contained in Part 2 as referenced in the table.

Emission Source ID	Emission Source Description (type, manufacturer and capacity)	Installation (I) / Modification (M) Dates	Control Device ID	Control Device Unit or Method (type, model, manufacturer, installation/modification)	Emission Source Conditions and Limitations	
					Local and Federal Requirements	Local Only Requirements
ES0125	A roll-type coater (#125) having one (1) print station with a 62" maximum width and a maximum speed of 100 feet/minute with one (1) direct-fired drying oven having multiple zones using a total maximum of 1.5 million Btu/hr natural gas with all coating emissions captured by total permanent enclosure	I = before 1970	CDSMITH	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-2, C-3, C-4, C-6, C-8, C-9, C-11, C-20, C-21, C-22, C-24, C-25, C-26, C-27, C-28	D-1, D-2, D-3
ES0127	A roll-type coater (#127) having one (1) print station with a 62" maximum width and a maximum speed of 100 feet/minute with one (1) direct-fired drying oven having multiple zones using a total maximum of 5.2 million Btu/hr natural gas with all coating emissions captured by total permanent enclosure.	I = before 1970	CDSMITH	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-2, C-3, C-4, C-6, C-8, C-9, C-11, C-20, C-21, C-22, C-24, C-25, C-26, C-27, C-28	D-1, D-2, D-3
ES0128	A roll-type coater (#128) having two (2) print stations with a 62" maximum width and a maximum speed of 250 feet/minute with two (2) steam drying ovens and all coating emissions captured by total permanent enclosure.	I = 1978	CDSMITH	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-4, C-6, C-8, C-9, C-11, C-20, C-21, C-22, C-24, C-25, C-26, C-27, C-28	D-1, D-2, D-3
ES0130	A roll-type coater (#130) having one (1) print station with a 62" maximum width and a maximum speed of 100 feet/minute with one (1) direct-fired drying oven having multiple zones using a total of 4.0 million Btu/hr natural gas with all coating emissions captured by total permanent enclosure.	I = before 1970 M = 1998	CDSMITH	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-2, C-3, C-4, C-6, C-8, C-9, C-11, C-19, C-20, C-21, C-22, C-24, C-25, C-26, C-27, C-28	D-1, D-2, D-3

Emission Source ID	Emission Source Description (type, manufacturer and capacity)	Installation (I) / Modification (M) Dates	Control Device ID	Control Device Unit or Method (type, model, manufacturer, installation/modification)	Emission Source Conditions and Limitations	
					Local and Federal Requirements	Local Only Requirements
ES0131	A roll-type coater (#131) having one (1) print station with a 31" maximum width and a maximum speed of 500 feet/minute with two (2) direct-fired drying ovens using a total of 3.2 million Btu/hr natural gas with all coating emissions captured by total permanent enclosure.	I = 1989	CDSMITH	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-2, C-3, C-4, C-6, C-8, C-9, C-11, C-13, C-14, C-15, C-17, C-20, C-21, C-22, C-23, C-24, C-25, C-26, C-27, C-28	D-1, D-2, D-3
ES0132	A roll-type coater (#132) having a 15.75" maximum width and a maximum speed of 250 feet/minute with electric drying oven and all operating emissions captured by total permanent enclosure.	I = 1998	CDSMITH	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-4, C-6, C-8, C-9, C-11, C-13, C-14, C-15, C-16, C-20, C-21, C-22, C-23, C-24, C-25, C-26, C-27, C-28	D-1, D-2, D-3
ES0133	A roll-type coater (#133) having two (2) print stations with a 65" maximum width and a maximum speed of 300 feet/minute with one (1) direct-fired drying oven using a total of 9.6 million Btu/hour natural gas with all coating emissions captured by total permanent enclosure	I = 2012	CDSMITH	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-2, C-3, C-4, C-8, C-9, C-11, C-18, C-20, C-21, C-22, C-24, C-25, C-26, C-27, C-28	D-1, D-2, D-3
ESBLR1	One (1) Burnham 25.085 million Btu/hour boiler used to provide process steam/heat, fueled only by natural gas.	I = 1998	None		C-1, C-3, C-5, C-12, C-21, C-28	
ESBLR2	One (1) Superior 20.085 million Btu/hr boiler used to provide process steam/heat, fueled only by natural gas.	I = 1991	None		C-1, C-3, C-5, C-12, C-21, C-28	
EST8ME	One (1) 8000 gallon storage tank used to store methyl ethyl ketone	I = 1988	None		C-28	
EST8TO	One (1) 8000 gallon storage tank used to store tetrahydrofuran (THF)	I = 1988	None		C-7, C-21, C-28	
EST301	One (1) 30,000 gallon storage tank	I = 1988	None		C-7, C-21, C-28	
EST302	One (1) 30,000 gallon storage tank	I = 1988	None		C-7, C-21, C-28	
ESWSH1	One (1) make ready and wash area for cleaning production equipment	I = 1992	None		C-4, C-28	D-1, D-2, D-3
ESWSH2	One (1) make ready wash area for cleaning production equipment	I = 2012	None	Smith Engineering Model E-1860 Thermal Oxidizer to control volatile organic compound emissions with a maximum firing rate of 34.8 million Btu/hr. (I=1993)	C-4, C-18, C-20, C-21, C-22, C-25, C-26, C-28	D-1, D-2, D-3
ESMIX	Fugitive emissions from mixing equipment used to prepare coatings for coating machines	I = before 1970	None		C-4, C-28	D-1, D-2, D-3
IS01	320 HP diesel powered fire pump	I = before 1996	None		C-3, C-10, C-21, C-28	

Emission Source ID	Emission Source Description (type, manufacturer and capacity)	Installation (I) / Modification (M) Dates	Control Device ID	Control Device Unit or Method (type, model, manufacturer, installation/modification)	Emission Source Conditions and Limitations	
					Local and Federal Requirements	Local Only Requirements
	13.8 kW diesel powered emergency generator	I = 2002				
IS02	Laboratory hoods in Research and Certification Labs		None			
IS03	Pumps related to storage tanks		None			
IS04	One (1) 1,000 gallon and two (2) 275- gallon storage tanks storing fuel oil for the fire pump and emergency generator (IS01)		None			
IS05	Paper trim collection system		None			
IS06	Paint Booth		None		C-4, C-28	D-1, D-2, D-3
IS07	Guillotine cutter		None			
IS08	Charles Beck Machine Sheeter		None			
IS10	Ten (10) web width corona treaters associated with coaters 125, 127, 128, 129, 131 (2), 132 (2), and 133 (2).		None			
IS13	One (1) Roland VS-540 Solvent Ink Printer		None		C-4, C-28	
IS14	Three (3) product slitters		None			



**ALTERNATIVE OPERATING SCENARIOS**

The following alternative operating scenarios (AOS) may be implemented by the facility without providing notification to MCAQ.

Emission Source ID	Emission Source Description	Alternative Operating Scenario No.	AOS Description	Emission Source Conditions and Limitations	
				Local and Federal Requirements	Local Only Requirements
ES0125	Coater #125	AOS # 1	<u>No Control Equipment:</u> When coater 125, 127, 128, 130, 131, 132, or 133 is coating with MCAQ approved coatings containing no VOC or HAP materials, the coating and associated ESWSH2 emissions can be routed directly to atmosphere, bypassing the Smith thermal oxidizer (CDSMITH) control device	C-2, C-3, C-21, C-25, C-28	D-1, D-2, D-3
ES0127	Coater #127				
ES0128	Coater #128				
ES0130	Coater #130				
ES0131	Coater #131				
ES0132	Coater #132				
ES0133	Coater #133				
ESWSH2	Make ready wash area #2				

**NOTE:** If an alternative operating scenario includes construction or installation of new equipment (equipment not currently on-site), the new equipment will be subject to MCAPCO Regulation 1.5232- "Issuance, Revocation, and Enforcement of Permits" Subparagraph (a)(5) which states in part: if "construction of the permitted equipment does not commence within 18 months of permit issuance or once construction has begun, it ceases prior to completion for a period of 18 consecutive months", the permit may be revoked or modified.

## **EMISSION SOURCE CONDITIONS AND LIMITATIONS**

### **C. LOCAL AND FEDERAL REQUIREMENTS**

Mecklenburg County Air Quality (“MCAQ”) and the United States Environmental Protection Agency (“EPA”) have the authority to enforce the terms, conditions, and limitations contained in this section.

- C-1. The facility shall be operated in accordance with **MCAPCO Regulation 2.0503 - “Particulates from Fuel Burning Indirect Heat Exchangers”**, such that the maximum particulate emission rate resulting from the combustion of a fuel shall not exceed the allowable emission rate of 0.42 lb/million Btu input.
- C-2. The facility shall be operated in accordance with **MCAPCO Regulation 2.0515 - “Particulates from Miscellaneous Industrial Processes”**, such that particulate emissions from any stack, vent or outlet shall not exceed the allowable emission rate. The allowable emission rate shall be determined using the appropriate formula below:

For process weight rates less than or equal to 30 tons/hour, the following formula shall be used:

$$E = 4.10 * P^{0.67}$$

For process weight rates greater than 30 tons/hr the following formula shall be used:

$$E = 55.0 * P^{0.11} - 40$$

Where:

E = maximum allowable emission rate for particulate matter in lbs/hr

P = process rate in tons/hr

- C-3. The facility shall be operated in accordance with **MCAPCO Regulation 2.0516 - “Sulfur Dioxide Emissions from Combustion Sources”**, such that sulfur dioxide emissions from any vent, stack or chimney shall not exceed 2.3 pounds per million Btu input.
- C-4. The facility shall be operated in accordance with **MCAPCO Regulation 2.0958 - “Work Practices For Sources Of Volatile Organic Compounds”**. The owner or operator of emission sources subject to this regulation shall:
- store all material, including waste material, containing volatile organic compounds in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
  - clean up spills as soon as possible following proper safety procedures,
  - store wipe rags in closed containers,
  - not clean sponges, fabric, wood, paper products, and other absorbent materials,
  - drain solvents used to clean supply lines and other coating equipment into closable containers and close containers immediately after each use,
  - clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent, closing the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be poured into a closed container.
- When cleaning parts, the owner or operator of any facility subject to this Regulation shall:
- flush parts in the freeboard area,

- B. take precautions to reduce the pooling of solvent on and in the parts,
- C. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
- D. not fill cleaning machines above the fill line,
- E. not agitate solvent to the point of causing splashing.

Sources on which a control device was installed to comply with **MCAPCO Regulation 2.0518 - “Miscellaneous Volatile Organic Compound Emissions”** Paragraph (d) (now repealed) shall continue to maintain and operate the control device providing at least 85% control efficiency, unless the Director determines that the removal of the control device shall not cause or contribute to a violation of the ozone ambient standard.

- C-5. The facility shall be operated in accordance with **MCAPCO Regulation 2.1111 - “Maximum Achievable Control Technology”** and **40 CFR Part 63 - “National Emission Standards For Hazardous Air Pollutants For Source Categories”**. The requirements are stated in **40 CFR 63.1 to 63.15 Subpart A - “General Provisions”**, and **40 CFR 63.7480 to 63.7575** (including Tables) **Subpart DDDDD - “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters”**, which includes the following pertinent sections:
- A. **63.7480 – “What is the purpose of this subpart?”**
  - B. **63.7485 – “Am I subject to this subpart?”**  
*This section states in part that you are subject to this subpart if you own or operate a an industrial, commercial, or institutional boiler or process heater that is located at a major source of HAP emissions.*
  - C. **63.7490 – “What is the affected source of this subpart?”**
  - D. **63.7491 – “Are any boilers or process heaters not subject to this subpart?”**
  - E. **63.7495 – “When do I have to comply with this subpart?”**  
*The compliance date for existing boilers or process heaters is January 31, 2016. New boilers or process heaters (commenced construction after June 4, 2010) must demonstrate compliance by January 31, 2013 or upon startup, whichever is later.*
  - F. **63.7499 – “What are the subcategories of boilers and process heaters?”**
  - G. **63.7500 – “What emission limitations, work practice standards, and operating limits must I meet?”**  
*Tables 1, 2, 3, 4, 12 and 13 outline emission limits, work practice standards, and operating limits.*
  - H. **63.7501 – “How can I assert an affirmative defense if I exceed and emission limitation during a malfunction?”**
  - I. **63.7505 – “What are my general requirements for complying with this subpart?”**
  - J. **63.7510 – “What are my initial compliance requirements and by what date must I conduct them?”**
  - K. **63.7515 – “When must I conduct subsequent performance tests, fuel analyses, or tune-ups?”**
  - L. **63.7520 – “What stack tests and procedures must I use?”**
  - M. **63.7521 – “What fuel analyses, fuel specification, and procedures must I use?”**
  - N. **63.7522 – “Can I use emissions averaging to comply with this subpart?”**
  - O. **63.7525 – “What are my monitoring, installation, operation, and maintenance requirements?”**
  - P. **63.7530 – “How do I demonstrate initial compliance with the emissions limitations, fuel specifications, and work practice standards?”**
  - Q. **63.7533 – “Can I use emission credits earned from implementation of energy conservation measures to comply with this subpart?”**
  - R. **63.7535 – “How do I monitor and collect data to demonstrate continuous compliance?”**
  - S. **63.7540 – “How do I demonstrate continuous compliance with the emissions limitations, fuel specifications, and work practice standards?”**

- T. **63.7541** – “How do I demonstrate continuous compliance under the emissions averaging provision?”
- U. **63.7545** – “What notifications must I submit and when?”
- V. **63.7550** – “What reports must I submit and when?”
- W. **63.7555** – “What records must I keep?”
- X. **63.7560** – “In what form and how long must I keep my records?”
- Y. **63.7565** – “What parts of the General Provisions apply to me?”
- Z. **63.7570** – “Who implements and enforces this subpart?”
- AA. **63.7575** – “What definitions apply to this subpart?”

C-6. The facility shall be operated in accordance with **MCAPCO Regulation 2.1111 - “Maximum Achievable Control Technology”** and **40 CFR Part 63 - “National Emission Standards For Hazardous Air Pollutants For Source Categories”**. The requirements are stated in **40 CFR 63.1 to 63.15 Subpart A - “General Provisions”**, and **40 CFR 63.701 to 63.708 Subpart EE - “National Emission Standards for Magnetic Tape Manufacturing Operations”**, which includes the following pertinent sections:

- A. **63.701 - “Applicability”**
- B. **63.702 - “Definitions”**
- C. **63.703 - “Standards”**

*Portions of this section require that the owner or operator of an affected source subject to this subpart limit HAP emissions from the following equipment:*

1. *solvent storage tanks*
2. *mix preparation equipment*
3. *coating operation*
4. *waste handling devices*
5. *condenser vents in solvent recovery*

*Refer to 63.703 for various emissions standards and compliance options available to the owner or operator.*

- D. **63.704 - “Compliance and monitoring requirements”**  
*Refer to 63.704 and Condition and Limitation No(s). C-21 of this permit for applicable requirements.*
- E. **63.705 - “Performance test methods and procedures to determine initial compliance”**  
*Refer to 63.705 and Condition and Limitation No(s). C-26 of this permit for applicable requirements.*
- F. **63.706 - “Recordkeeping requirements”**  
*Refer to 63.706 and Condition and Limitation No(s). C-21 of this permit for applicable requirements.*
- G. **63.707 - “Reporting requirements”**  
*Refer to 63.707 Condition and Limitation No(s). C-28 of this permit for applicable requirements.*
- H. **63.708 - “Implementation and enforcement”**

C-7. The facility shall be operated in accordance with **MCAPCO Regulation 2.1111 - “Maximum Achievable Control Technology”** and **40 CFR Part 63 - “National Emission Standards For Hazardous Air Pollutants For Source Categories”**. The requirements are stated in **40 CFR 63.1 to 63.15 Subpart A - “General Provisions”**, and **40 CFR 63.2330 to 63.2406 (including Tables 1 - 12) Subpart EEEE - “National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)”**, which includes the following pertinent sections:

- A. **63.2330 – “What is the purpose of this subpart?”**
- B. **63.2334 – “Am I subject to this subpart?”**
- C. **63.2338 – “What parts of my plant does this subpart cover?”**
- D. **63.2342 – “When do I have to comply with this subpart?”**
- E. **63.2343 – “What are my requirements for emission sources not requiring control?”**
- F. **63.2346 – “What emission limitations, operating limits, and work practice standards must I meet?”**  
*Portions of this Section state that the facility must ensure compliance for storage tanks, transfer racks, and equipment leak components by meeting limits, routing emissions back into the process, using control devices, or using vapor balancing as described in the regulation. The facility must also ensure that organic liquids are loaded only into vapor-tight transport vehicles or ensure that transport vehicles have a current certification in accordance with the U.S. Department of Transportation (DOT) pressure test requirements.*
- G. **63.2350 – “What are my general requirements for complying with this subpart?”**
- H. **63.2354 – “What performance tests, design evaluations, and performance evaluations must I conduct?”**
- I. **63.2358 – “By what date must I conduct performance tests and other initial compliance demonstrations?”**
- J. **63.2362- “When must I conduct subsequent performance tests?”**
- K. **63.2366 – “What are my monitoring, installation, operation, and maintenance requirements?”**  
*Refer to 63.2366 and Condition C-21 of this permit for monitoring requirements.*
- L. **63.2370 – “How do I demonstrate initial compliance with the emission limitations, operating limits, and work practice standards?”**
- M. **63.2374 – “When do I monitor and collect data to demonstrate continuous compliance and how do I use the collected data?”**  
*Refer to 63.2374 and Condition C-21 of this permit for monitoring requirements.*
- N. **63.2378 – “How do I demonstrate continuous compliance with the emission limitations, operating limits, and work practice standards?”**
- O. **63.2382 – “What notifications must I submit and when, and what information should be submitted?”**  
*Refer to 63.2382 and Condition C-28 of this permit for notification requirements.*
- P. **63.2386 – “What reports must I submit and when and what information is to be submitted in each?”**  
*Refer to 63.2386 and Condition C-28 of this permit for reporting requirements.*
- Q. **63.2390 – “What records must I keep?”**  
*Refer to 63.2390 and Condition C-21 of this permit for recordkeeping requirements.*
- R. **63.2394 – “In what form and how long must I keep my records?”**
- S. **63.2396 – “What compliance options do I have if part of my plant is subject to both this subpart and another subpart?”**
- T. **63.2398 – “What parts of the General Provisions apply to me?”**
- U. **63.2402 – “Who implements and enforces this subpart?”**
- V. **63.2406 – “What definitions apply to this subpart?”**

- C-8. The facility shall be operated in accordance with MCAPCO Regulation 2.1111 - “Maximum Achievable Control Technology” and 40 CFR Part 63 - “National Emission Standards For Hazardous Air Pollutants For Source Categories”. The requirements are stated in 40 CFR 63.1 to 63.15 Subpart A - “General Provisions”, and 40 CFR 63.3280 to 63.3420 Subpart JJJJ - “National Emission Standards for Paper and Other Web Coating”, which includes the following pertinent sections:
- A. **63.3280 - “What is in this subpart?”**
  - B. **63.3290 - “Does this subpart apply to me?”**
  - C. **63.3300 - “Which of my emission sources are affected by this subpart?”**

- D. **63.3310 - “What definitions are used in this subpart?”**
- E. **63.3320 - “What emission standards must I meet?”**  
*Portions of this Section require that the owner or operator of any affected source comply with one of the following requirements:*
1. *Achieve 95 % reduction of HAP emissions at existing sources and 98% reduction at new sources or*
  2. *Limit organic HAP emissions to no more than 4% of the mass of coating materials applied each month at existing sources and no more than 1.6% at new affected sources or*
  3. *Limit organic HAP emissions to no more than 20% of the mass of coating solids applied for each month at existing affected sources and no more than 8% at new affected sources or*
  4. *Operate the oxidizer used to control emissions such that an outlet organic HAP concentration of 20 ppmv by compound on a dry basis is achieved and the efficiency of the capture system is 100%.*
- F. **63.3321 - “What operating limits must I meet?”**  
*Portions of this Section require that any thermal oxidizer controlling any affected web coating line or group of web coating lines must be operated at or above a minimum combustion temperature established according to 63.3360(e)(3)(i).*
- G. **63.3330 - “When must I comply?”**  
*This section requires that owners and operators of existing affected sources comply with this subpart by December 5, 2005. Refer to 63.3330 for compliance schedule for new affected sources.*
- H. **63.3340 - “What general requirements must I meet to comply with the standards?”**
- I. **63.3350 - “If I use a control device to comply with the emission standards, what monitoring must I do?”**  
*Refer to 63.3350 (e) and Condition and Limitation No(s). C-21 of this permit for continuous parameter monitoring system requirements for control devices. Refer to 40 CFR 63.3350(f) and Specific Condition and Limitation No(s). C-21 of this permit for capture system operating parameter monitoring requirements.*
- J. **63.3360 - “What performance tests must I conduct?”**  
*Refer to 63.3360 and Condition and Limitation No(s). C-26 of this permit for all performance test requirements.*
- K. **63.3370 - “How do I demonstrate compliance with the emission standards?”**  
*Portions of this Section require that owners or operators of affected sources that use an oxidizer to control emissions to demonstrate compliance as follows:*
1. *Initial compliance – Demonstrate through performance tests of capture efficiency and control device efficiency*
  2. *Continuing Compliance – Demonstrate through continuous monitoring of capture system and control device operating parameters as specified in paragraphs (k)(1)(i) through (vi) of this section.*
- L. **63.3400 – “What notifications and reports must I submit?”**  
*Refer to 63.3400 and Condition and Limitation No(s). C-28 of this permit for all notification and reporting requirements.*
- M. **63.3410 – “What records must I keep?”**  
*Refer to 63.3410 and Condition and Limitation No(s). C-28 of this permit for all recordkeeping requirements.*
- N. **63.3420 - “What authorities may be delegated to the States?”**
- C-9. The facility shall be operated in accordance with MCAPCO Regulation 2.1111 - “Maximum Achievable Control Technology” and 40 CFR Part 63 - “National Emission Standards For Hazardous Air Pollutants For Source Categories”. The requirements are stated in 40 CFR 63.1 to 63.15 Subpart A - “General Provisions”, and 40 CFR 63.4280 to 63.4371 Subpart OOOO - “National Emission Standards for Printing, Coating, and Dyeing of Fabrics and Other Textiles”, which includes the following pertinent sections:

- A. **63.4280 - “What is the purpose of this subpart?”**
- B. **63.4281 - “Am I subject to this subpart?”**
- C. **63.4282 - “What parts of my plant does this subpart cover?”**  
*Refer to 63.4282 (b) for a list of the affected sources in the web coating and printing subcategory.*
- D. **63.4283 – “When do I have to comply with this subpart?”**  
*Portions of this Section require that the owner or operator of any existing affected source comply with this subpart by May 29, 2006.*
- E. **63.4290 - “What emission limits must I meet?”**
- F. **63.4291 - “What are my options for meeting the emission limits?”**  
*Portions of this Section require that any owner or operator of an affected source in the web coating and printing subcategory must use at least one of the compliance options listed below.*
  - 1. *Compliant material option or*
  - 2. *Emission rate without add-on controls option or*
  - 3. *Emission rate with add-on controls option or*
  - 4. *Organic HAP overall control efficiency option or*
  - 5. *Oxidizer outlet organic HAP concentration limit.*
- G. **63.4292 - “What operating limits must I meet?”**  
*Refer to 63.4292 for operating limit requirements for control equipment used to comply with this Subpart.*
- H. **63.4293 - “What work practice standards must I meet?”**  
*Refer to 63.4293 for work practice standards if control equipment is used to comply with this Subpart.*
- I. **63.4300 - “What are my general requirements for complying with this subpart?”**
- J. **63.4301 - “What parts of the General Provisions apply to me?”**
- K. **63.4310 - “What notifications must I submit?”**  
*Refer to 63.4310 and Condition and Limitation No(s). C-28 of this permit for all notification requirements.*
- L. **63.4311 - “What reports must I submit?”**  
*Refer to 63.4311 and Condition and Limitation No(s). C-28 of this permit for all reporting requirements.*
- M. **63.4312 – “What records must I keep?”**  
*Refer to 63.4312 and Condition and Limitation No(s). C-21 of this permit for all recordkeeping requirements.*
- N. **63.4313 – “In what form and for how long must I keep my records?”**
- O. **63.4320 – 63.4322 – “Compliance Requirements for the Compliant Material Option”**
- P. **63.4330 – 63.4332 – “Compliance Requirements for the Emission Rate Without Add-On Controls Option”**
- Q. **63.4340 – 63.4342 – “Compliance Requirements for the Emission Rate With Add-On Controls Option”**
- R. **63.4350 – 63.4352 – “Compliance Requirements for the Organic HAP Overall Control Efficiency and Oxidizer Outlet Organic HAP Concentration Options”**
- S. **63.4360 – 63.4364 – “Performance Testing and Monitoring Requirements”**  
*Refer to 63.4360 through 63.4363 and Condition and Limitation No(s). C-26 of this permit for performance testing requirements. Refer to 63.4364 and Condition and Limitation No(s). C-21 of this permit for monitoring requirements.*
- T. **63.4370 – “Who implements and enforces this subpart?”**
- U. **63.4371 – “What definitions apply to this subpart?”**

- C-10. The facility shall be operated in accordance with **MCAPCO Regulation 2.1111 - “Maximum Achievable Control Technology”** and **40 CFR Part 63 - “National Emission Standards For Hazardous Air Pollutants For Source Categories.”** The requirements are stated in **40 CFR 63.1 to 63.15 Subpart A - “General Provisions”,** and **40 CFR 63.6580 to 63.6675 Subpart ZZZZ - “National Emission Standards from Stationary Reciprocating Internal Combustion Engines” (RICE),** including but not limited to:
- A. **63.6580 – “What is the purpose of subpart ZZZZ?”**
  - B. **63.6585 - “Am I subject to this subpart?”**  
*This section states in part that you are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions.*
  - C. **63.6590 – “What parts of my plant does this subpart cover?”**  
*Portions of this section define existing, new, and reconstructed stationary RICE for the purpose of determining emission control requirements. An affected source that is a new or reconstructed stationary RICE located at an area source must meet the requirements of this subpart by meeting the requirements of 40 CFR 60 Subpart IIII, for compression ignition engines, or 40 CFR 60 Subpart JJJJ, for spark ignition engine.*
  - D. **63.6595 – “When do I have to comply with this subpart?”**  
*Portions of this section require that the owner or operator of a new or reconstructed source comply with the requirements of this subpart by January 18, 2008 if startup of the source is before that date, and on startup if startup of the source is after that date. An owner or operator of a source that is an existing non-emergency stationary RICE with a site rating of more than 500 brake HP located at a major source, an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source, or an existing stationary RICE located at an area source must comply with the requirements of this subpart no later than May 3, 2013.*
  - E. **63.6600 – “What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?”**
  - F. **63.6601 – “What emission limitations must I meet if I own or operate a 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than 500 brake HP located at a major source of HAP emissions?”**
  - G. **63.6602 – “What emission limitations must I meet if I own or operate an existing stationary CI RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?”**
  - H. **63.6603 – “What emission limitations and operating limitations must I meet if I own or operate an existing stationary CI RICE located at an area source of HAP emissions?”**
  - I. **63.6604 – “What fuel requirements must I meet if I own or operate an existing stationary CI RICE?”**
  - J. **63.6605 – “What are my general requirements for complying with this subpart?”**
  - K. **63.6610 – “By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?”**
  - L. **63.6611 – “By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?”**
  - M. **63.6612 – “By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?”**
  - N. **63.6615 – “When must I conduct subsequent performance tests?”**
  - O. **63.6620 – “What performance tests and other procedures must I use?”**
  - P. **63.6625 – “What are my monitoring, installation, operation, and maintenance requirements?”**



- Q. **63.6630** – “How do I demonstrate initial compliance with the emission limitations and operating limitations?”
- R. **63.6635** – “How do I monitor and collect data to demonstrate continuous compliance?”
- S. **63.6640** – “How do I demonstrate continuous compliance with the emission limitations and operating limitations?”
- T. **63.6645** – “What notifications must I submit and when?”
- U. **63.6650** – “What reports must I submit and when?”
- V. **63.6655** – “What records must I keep?”
- W. **63.6660** – “In what form and how long must I keep my records?”
- X. **63.6665** – “What parts of the General Provisions apply to me?”
- Y. **63.6670** – “Who implements and enforces this subpart?”
- Z. **63.6675** – “What definitions apply to this subpart?”

- C-11. The facility shall be operated in accordance with **MCAPCO 2.0966 - “Paper, Film and Foil Coatings”**. Emissions of volatile organic compounds from:
- A. pressure sensitive tape and label surface coating lines with the potential to emit, prior to controls, less than 25 tons per year of volatile organic compounds from coatings shall not exceed 0.20 pounds volatile organic compounds per pound of solids applied (0.067 pounds volatile organic compounds per pound of coating applied);
  - B. paper, film, and foil surface coating lines with the potential to emit, prior to controls less than 25 tons per year of volatile organic compounds from coatings shall not exceed 0.40 pounds of volatile organic compounds per pound of solids (0.08 pounds volatile organic compounds per pound of coating applied); and
  - C. The volatile organic compounds content limits shall be determined in accordance with Paragraphs (c) of **MCAPCO Regulation 2.0912 – “General Provisions on Test Methods and Procedures”**. EPA Method 24 or 25A of Appendix A to 40 CFR Part 60 shall be used to determine the volatile organic compounds content of coating materials used at paper, film and foil coatings facilities unless the facility maintains records to document the volatile organic compounds content of coating materials from the manufacturer. Any individual paper, film, and foil coating line with the potential to emit, prior to controls, at least 25 tons per year of volatile organic compounds from coatings shall apply control with overall volatile organic compounds efficiency of 90 percent rather than the emission limits established in Paragraph (d) of this Regulation or use a combination of coating and add-on control equipment on a coating unit to meet limits that are equivalent to 90 percent overall control efficiency.
- C-12. The facility shall be operated in accordance with **MCAPCO Regulation 2.0524 - “New Source Performance Standards”**. The requirements are stated in **40 CFR 60.1 to 60.19, Subpart A - “General Provisions”**, and **40 CFR 60.40c to 60.48c, Subpart Dc - “Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units”** including but not limited to:
- A. **60.40c - “Applicability and delegation of authority”**
  - B. **60.41c - “Definitions”**
  - C. **60.48c - “Reporting and recordkeeping requirements”**
- Refer to 60.48c and Condition and Limitation No(s). C-21 and C-28 of this permit for all reporting and recordkeeping requirements*

- C-13. The facility shall be operated in accordance with **MCAPCO Regulation 2.0524 - “New Source Performance Standards”**. The requirements are stated in **40 CFR 60.1 to 60.19, Subpart A- “General Provisions”**, and **40 CFR 60.580 to 40 CFR 60.585, Subpart FFF - “Standards of Performance for Flexible Vinyl and Urethane Coating and Printing”** which includes the following pertinent sections:
- A. **60.580 - “Applicability and designation of affected facility”**
  - B. **60.581 - “Definitions and symbols”**
  - C. **60.582 - “Standard for volatile organic compounds”**  
*Portions of this Section require that:*
    - 1. *Use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids, or*
    - 2. *Reduce VOC emissions to the atmosphere by 85%.*
  - D. **60.583 - “Test methods and Procedures”**
  - E. **60.584 - “Monitoring and recordkeeping”**
  - F. **60.585 - “Reporting Requirements”**  
*Refer to 60.584, 60.585, and Condition and Limitation No(s). C-21 and C-28 of this permit for all reporting and record keeping requirements.*
- C-14. The facility shall be operated in accordance with **MCAPCO Regulation 2.0524 - “New Source Performance Standards”**. The requirements are stated in **40 CFR 60.1 to 60.19, Subpart A - “General Provisions”**, and **40 CFR 60.710 to 60.718, Subpart SSS - “Standards of Performance for Magnetic Tape Coating Facilities”** which includes the following pertinent sections:
- A. **60.710 - “Applicability and designation of affected facility”**
  - B. **60.711 - “Definitions, symbols, and cross reference tables”**
  - C. **60.712 - “Standards for volatile organic compounds”**  
*Portions of this Section require all affected facilities to comply with the emission limitations set forth in this section on and after the date on which the initial performance test required by §60.8 is completed, but not later than 60 days after achieving the maximum production rate at which the affected facility will be operated or 180 days after initial startup, whichever date comes first.*  
*Compliance options vary depending on the modification status of the equipment:*
    - (b) *For a new coating operation, the facility must control emissions by recovering or destroying at least 93 percent of the VOC content of the coating applied at the coating applicator.*
    - (c) *For a modified or reconstructed coating operation, the facility shall meet the appropriate standard set out in (b)(1), (2), or (3) of this section.*
    - (d) *For new coating mix preparation equipment with concurrent construction of a new VOC control device (other than a condenser) on a magnetic tape coating operation, the facility shall control emissions from the coating mix preparation equipment by installing and using a cover on each piece of equipment and venting the equipment to a 95 percent efficient control device.*
    - (e) *coating mix preparation equipment not subject to §60.712(c) shall control emissions from the coating mix preparation equipment by either:*
      - (1) *Installing and using a cover that meets the specifications in paragraphs (c)(1)–(5) of this section and venting VOC emissions from the equipment to a VOC control device; or*
      - (2) *Installing and using a cover that meets the specifications in paragraphs (c)(1)–(5) of this section*
    - (f) *In lieu of complying with §60.712(a) through (d), each owner or operator may use coatings that contain a maximum of 0.20 kg of VOC per liter of coating solids as calculated on a weighted average basis for each nominal 1-month period*

- D. **60.713 - “Compliance provisions”**
  - E. **60.714 - “Installation of monitoring devices and recordkeeping”**  
*Refer to 60.714 and Condition and Limitation No(s). C-21 of this permit for all monitoring requirements.*
  - F. **60.715 - “Test Methods and procedures”**
  - G. **60.716 - “Permission to use alternative means of emission limitation”**
  - H. **60.717 - “Reporting and monitoring requirements”**  
*Refer to 60.714, 60.717, and Condition and Limitation Nos. C-21 and C-28 of this permit for all reporting and recordkeeping requirements.*
  - I. **60.718 - “Delegation of authority”**
- C-15. The facility shall be operated in accordance with **MCAPCO Regulation 2.0524 - “New Source Performance Standards”**. The requirements are stated in **40 CFR 60.1 to 60.19, Subpart A - “General Provisions”**, and **40 CFR 60.740 to 60.748, Subpart VVV - “Standards of Performance for Polymeric Coating of Supporting Substrates Facilities”** which includes the following pertinent sections:
- A. **60.740 - “Applicability and designation of affected facility”**
  - B. **60.741 - “Definition, symbols, and cross-reference tables”**
  - C. **60.742 - “Standards for volatile organic compounds”**  
*Portions of this Section require all affected facilities to:*
    - (1) *reduce VOC emissions from the coating operation by at least 90 percent; or*
    - (2) *install, operate, and maintain a total enclosure around the coating operation and vent captured VOC emissions from the total enclosure to a control device that is at least 95 percent efficient; and*
    - (3) *comply with the standards for onsite coating mix preparation equipment*
  - D. **60.743 - “Compliance provisions”**
  - E. **60.744 - “Monitoring requirements”**  
*Refer to 60.744 and Condition and Limitation No(s). C-21 of this permit for all monitoring requirements.*
  - F. **60.745 - “Test methods and procedures”**
  - G. **60.746 - “Permission to use alternative means of emission limitation”**
  - H. **60.747 - “Reporting and recordkeeping requirements”**  
*Refer to 60.747 and Condition and Limitation No(s). C-21 and C-28 of this permit for all reporting and recordkeeping requirements.*
  - I. **60.748 - “Delegation of authority”**
- C-16. The maximum VOC emissions from emission source ES0132 (Coater #132) and operations related to the coater shall be less than 40 tons per calendar year. This limit is assumed by the facility in order to preclude applicability to **MCAPCO Regulation 2.0530 - “Prevention of Significant Deterioration”** which refers to **40 CFR 51 Subpart I - “Review of New Sources and Modifications”**. Emissions for the above-referenced pollutant(s) shall be determined using one or more of the following methods as applicable:
- 1. Emission rates and control efficiencies obtained through MCAQ-approved emission source testing;
  - 2. Material (mass) balance based on product usage;
  - 3. Emission factors or rates found in the latest edition of the “Compilation of Air Pollutant Emission Factors”, EPA document AP-42;
  - 4. Other emission factors or rates as approved by MCAQ.

- C-17. The maximum VOC emissions from emission source ES0131 (Coater #131) and operations related to the coater shall be less than 21.9 tons per any consecutive 12 months and less than 5.0 pounds per hour. This limit is assumed by the facility in order to preclude applicability to **MCAPCO Regulation 2.0531 – “Sources in Nonattainment Areas”** which refers to **40 CFR 51 Subpart I – “Review of New Sources and Modifications”**. Emissions for the above-referenced pollutant(s) shall be determined using one or more of the following methods as applicable:
1. Emission rates and control efficiencies obtained through MCAQ-approved emission source testing;
  2. Material (mass) balance based on product usage;
  3. Emission factors or rates found in the latest edition of the “Compilation of Air Pollutant Emission Factors”, EPA document AP-42;
  4. Other emission factors or rates as approved by MCAQ.

- C-18. The maximum VOC emissions from emission sources ES0133 and ESWSH2 (Coater #133 and Make Ready/Wash Area #2) shall be less than 40 tons on a 12-month rolling basis. This limit is assumed by the facility in order to preclude applicability to **MCAPCO Regulation 2.0531 – “Sources in Nonattainment Areas”** which refers to **40 CFR 51 Subpart I – “Review of New Sources and Modifications”**. Total VOC emissions from the referenced emission sources shall include: Coater emissions (ES0133), Oven Emissions (ES0133 Oven), and Make Ready/Wash Area emissions (ESWSH2):

$$ES0133 \text{ Coater VOC emissions (tons)} = \frac{\text{Mix Use Rate (lb/hr)} \times \text{VOC content (\%)} \times \text{Hours of Operation} \times (1-97\%)}{2000 \text{ (lbs/ton)}}$$

$$ES0133 \text{ Oven VOC emissions (tons)} = \frac{0.005 \text{ (lb/MMBtu)} \times \text{fuel usage (mmscf)} \times 1020 \text{ (Btu/scf)}}{2000 \text{ (lbs/ton)}}$$

$$\text{Make Ready Area \#2 VOC emissions (tons)} = \frac{\text{Solvent Usage (lb/hr)} \times \text{Evaporation Rate (\%)} \times (1-97\%) \times 0.33}{2000 \text{ (lbs/ton)}}$$

Note that CDSMITH control efficiency must be at a minimum of 97% when Coater #133 is routed to it.

- C-19. The facility shall be operated in accordance with **MCAPCO Regulation 2.0531 - “Sources in Nonattainment Areas”** which refers to **40 CFR 51 Subpart I - “Review of New Sources and Modifications”**, specifically **40 CFR 51.165 - “Permit Requirement”**. The maximum VOC emission rate and control efficiency from emission source ES0130 (Coater #130) and the control device CDSMITH (Thermal Oxidizer) shall not exceed the lowest achievable emission rate (LAER) limits as listed below:

- Coater #130 Maximum VOC Emission Rate: 16.5 pounds/hour
- CDSMITH Control Device Minimum Emissions Reduction Level: ninety percent (90%)

- C-20. In accordance with Condition and Limitation C-18, the overall control efficiency for control device CDSMITH (Thermal Oxidizer) shall be a minimum of ninety seven percent (97%) when emission source ES0133 (Coater #133) is operating and its emissions are being routed to the thermal oxidizer (primary operating scenario). When ES0133 is operating under the alternative operating scenario AOS#1, or otherwise not routing emissions to CDSMITH, the required overall control efficiency for CDSMITH is a minimum of ninety five percent (95%),

C-21. In accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”, 2.0605 – “General Recordkeeping and Reporting Requirements”,** and/or **40 CFR Part 64 - “Compliance Assurance Monitoring”,** the facility shall monitor and record the following operating parameters for the emission sources and control devices as listed below:

EMISSION SOURCE / CONTROL DEVICE	OPERATING PARAMETER	PARAMETER RANGE	MINIMUM MONITORING FREQUENCY (Once per...)
CDSMITH Thermal Oxidizer	1. Chamber temperature (primary and secondary) 2. Flow rate of the VOC stream through the combustion chamber.	1. Excursion occurs when instantaneous temperature is < 1400°F for non NSPS and MACT regulated coating operations. 2. Excursion occurs when flow rate >100,000 acfm	Continuous
Emission sources subject to <b>40 CFR 60 NSPS Subpart Dc</b> for boilers	Refer to <b>40 CFR 60.48c and Condition C-12</b> of this permit for specific monitoring and recordkeeping requirements related to <b>40 CFR 60</b> emission sources.	Records of natural gas usage are required to be maintained as specified in the regulation.	Refer to <b>40 CFR 60.7 and 60.48c</b>
Emission sources subject to <b>40 CFR 60 NSPS Subpart FFF</b> for flexible vinyl and urethane coating and printing	Refer to <b>40 CFR 60.7, 60.584, and Condition and Limitation C-13</b> of this permit for specific monitoring and recordkeeping requirements related to <b>40 CFR 60 Subpart FFF</b> emission sources including but not limited to:  CDSMITH exhaust gas temperature	Excursion occurs when the average exhaust temperature over a 3-hour period is more than 28°C (50°F) below the average temperature demonstrated during the most recent performance test.*  Temperature monitoring device shall be calibrated annually with an accuracy of ± 0.75% or ± 2.5°C, whichever is larger.	Continuous
Emission sources subject to <b>40 CFR 60 NSPS Subpart SSS</b> for magnetic tape coating and  Emission sources subject to <b>40 CFR 60 NSPS Subpart VVV</b> for polymeric coating of supporting substrates	Refer to <b>40 CFR 60.717 and Condition C-14</b> of this permit for specific monitoring and recordkeeping requirements related to <b>40 CFR 60 Subpart SSS</b> emission sources, and,  <b>40 CFR 60.747 and Condition C-15</b> of this permit for specific monitoring and recordkeeping requirements related to <b>40 CFR 60 Subpart VVV</b> emission sources including but not limited to:  1. CDSMITH combustion temperature 2. Differential pressure between inside and outside of permanent total enclosure	1. Excursion occurs when the average combustion temperature over a 3-hour period is more than 28°C (50°F) below the average temperature demonstrated during the most recent performance test.*  Temperature monitoring device shall be calibrated according to manufacturer’s specifications with an accuracy of ± 1.0%.  2. Excursion occurs when the average for a 3-hour period is less than 0.007 in H <sub>2</sub> O or ≥ 5% from the average value measured during the most recent performance test.  Pressure monitoring device shall be calibrated according to manufacturer’s specifications	Continuous

EMISSION SOURCE / CONTROL DEVICE	OPERATING PARAMETER	PARAMETER RANGE	MINIMUM MONITORING FREQUENCY (Once per...)
<p>Emission sources subject to <b>40 CFR 63 MACT Subpart EE</b> for magnetic tape manufacturing; and,</p> <p>Emission sources subject to <b>40 CFR 63 MACT Subpart JJJJ</b> for paper and other web coating; and,</p> <p>Emission sources subject to <b>40 CFR 63 MACT Subpart OOOO</b> for printing, coating, and dyeing of fabrics and other textiles</p>	<p>Refer to <b>40 CFR 63.704, 63.706, and Condition C-6</b> of this permit for specific monitoring and recordkeeping requirements related to <b>40 CFR 63 Subpart EE</b> emission sources; and,</p> <p><b>40 CFR 63.3350, 63.3370, and Condition C-8</b> of this permit for specific monitoring and recordkeeping requirements related to <b>40 CFR 63 Subpart JJJJ</b> emission sources; and,</p> <p><b>40 CFR 63.4312 and Condition C-9</b> of this permit for specific monitoring and recordkeeping requirements related to <b>40 CFR 63 Subpart OOOO</b> emission sources including but not limited to:</p> <ol style="list-style-type: none"> <li>1. CDSMITH combustion temperature</li> <li>2. Differential pressure between inside and outside of permanent total enclosure</li> </ol>	<ol style="list-style-type: none"> <li>1. Excursion occurs when the average for a 3-hour period is less than the average temperature demonstrated during the most recent performance test.* Temperature monitoring device shall be calibrated or replaced according to manufacturer's specifications every 3 months.</li> <li>2. Excursion occurs when the average for a 3-hour period is less than 0.007 in H<sub>2</sub>O. Pressure monitoring device shall be calibrated according to manufacturer's specifications.</li> </ol>	<p>Continuous</p>
<p>Emission sources subject to <b>40 CFR 63 MACT Subpart DDDDD</b> for boilers</p>	<p>Refer to <b>40 CFR 63.7525, 63.7535, 63.7555 and Condition and Limitation No. C-5</b> of this permit for specific monitoring and recordkeeping requirements including but not limited to:</p> <p>Annual boiler tune-up and maintenance</p>	<p>Conduct an annual tune-up and document maintenance in accordance with <b>40 CFR 63.7540(a)(1) Table 3</b>; and,</p> <p>Maintain records as required by <b>40 CFR 63.7555(a)</b>.</p>	<p>Refer to <b>40 CFR 63.7525, 63.7535, and 63.7555</b></p>
<p>Emission sources subject to <b>40 CFR 63 MACT Subpart EEEE</b> for organic liquids distribution</p>	<p>Refer to <b>40 CFR 63.2343, 63.2390 and Condition and Limitation No. C-7</b> of this permit for specific monitoring and recordkeeping requirements.</p>	<p>Storage tank and transfer rack records are required to be maintained as specified in the regulation.</p>	<p>Refer to <b>40 CFR 63.2343 and 63.2390</b></p>
<p>Emission sources subject to <b>40 CFR 63 MACT Subpart ZZZZ</b> for stationary RICE</p>	<p>Refer to <b>40 CFR 63.6625, 63.6635, and 63.6655 and Condition and Limitation No. C-10</b> of this permit for specific recordkeeping requirements.</p>	<p>Operation and maintenance records are required to be maintained as specified in the regulation.</p>	<p>Refer to <b>40 CFR 63.6625, 63.6635, and 63.6655</b></p>
<p>Alternative Operating Scenario (AOS#1)</p>	<p>Refer to <b>MCAPCO Regulation 1.5508(j) and Condition and Limitation No. C-25</b> for specific recordkeeping requirements.</p>	<p>Records of alternative operating scenario procedures are required to be maintained as specified in the regulation.</p>	<p>Refer to <b>MCAPCO Regulation 1.5508(j)</b></p>

*\* Most recent performance test parameters can be found in Attachment 2.*

The facility shall maintain the above-specified operating records as well as any maintenance records for activity conducted on the equipment for a period of not less than 2 years (5 years for MACT), unless otherwise specified by the permit. The records shall be available for inspection by MCAQ personnel upon request.

- C-22. The coating process and associated permanent total enclosure shall be operated concurrently with the associated control device specified in this Permit to Construct/Operate except when:
- subject to the provisions of **MCAPCO Regulation 2.0535 - “Excess Emissions Reporting and Malfunctions”**; or,
  - the coating process operates using coatings which do not contain any air pollutants regulated by the Mecklenburg County Air Pollution Control Ordinance.
- The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution.
- C-23. The coating process and associated permanent total enclosure shall be operated concurrently with the associated control device specified in this Permit to Construct/Operate except when:
- subject to the malfunction provisions contained in the **General Provisions of New Source Performance Standards, Subpart A (40 CFR Part 60.1-60.19)**;
  - as specified in the applicable **40 CFR Part 60** Subpart; or
  - the coating process operates using coatings which do not contain any air pollutants regulated by the Mecklenburg County Air Pollution Control Ordinance.
- The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution.
- C-24. The coating process and associated permanent total enclosure shall be operated concurrently with the associated control device specified in this Permit to Construct/Operate except when:
- subject to the malfunction provisions contained in the **General Provisions of National Emission Standards for Hazardous Air Pollutants, Subpart A (40 CFR part 63.1 - 63.15)** or
  - as specified in the applicable **40 CFR Part 63** Subpart; or
  - the coating process operates using coatings which do not contain any air pollutants regulated by the Mecklenburg County Air Pollution Control Ordinance.
- The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution.
- C-25. In accordance with **MCAPCO 1.5508(j)**, the permittee shall be allowed to make changes to its methods of operation without notifying the permitting authority, provided that such changes are explicitly provided for in this permit. The permittee, contemporaneously with making a change from one operating scenario to another, shall record in a log at the permitted facility, a record of the operating scenario under which it is operating. As allowed in Condition A-34 of this permit, the permit shield may extend to the terms and conditions under each operating scenario. The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution.

C-26. The facility shall, at its own expense and using the most recent versions of the performance test methods contained in **40 CFR Part 60 (Appendix A)** or **Part 63** or as approved by the Administrator of the USEPA or MCAQ, demonstrate compliance with the appropriate regulatory requirement as follows:

EMISSION SOURCE DESCRIPTION AND ID	DEMONSTRATE COMPLIANCE WITH...	SCHEDULED TESTING FREQUENCY
ES0125 Coater #125 ES0127 Coater #127 ES0128 Coater #128 ES0130 Coater #130 ES0131 Coater #131 ES0132 Coater #132. ES0133 Coater #133 CDSMITH Thermal Oxidizer	<p><b>Condition and Limitation No. C-20</b> of this permit for overall VOC destruction efficiency; and,</p> <p><b>MCAPCO Regulation 2.0966</b> and <b>Condition and Limitation No. C-11</b> of this permit for VOC and/or VOC destruction efficiency from paper, film, and foil coatings</p>	<p>Initial Test: within 180 days of any modification to the emission source or control device</p> <p>Additional Tests: upon written request by MCAQ or as requested by Permittee</p> <p>Additional Tests: every 5 years in conjunction with the request for renewal applications for this Title V permit. The test shall be completed prior to submittal of the renewal application.</p>
ES0125 Coater #125 ES0127 Coater #127 ES0128 Coater #128 ES0130 Coater #130 ES0131 Coater #131 ES0132 Coater #132 CDSMITH Thermal Oxidizer	<p><b>40 CFR 63.705</b> and <b>Condition and Limitation No. C-6</b> of this permit for HAP and/or HAP destruction efficiency from <b>40 CFR 63 Subpart EE</b> magnetic tape manufacturing</p>	<p>Refer to <b>40 CFR 63.705</b></p> <p>Initial Test: within 180 days of any modification to the emission source or control device</p> <p>Additional Tests: upon written request by MCAQ or as requested by Permittee</p>
ES0125 Coater #125 ES0127 Coater #127 ES0128 Coater #128 ES0130 Coater #130 ES0131 Coater #131 ES0132 Coater #132 ES0133 Coater #133 CDSMITH Thermal Oxidizer	<p><b>40 CFR 63.3360</b> and <b>Condition and Limitation No. C-8</b> of this permit for HAP and/or HAP destruction efficiency from <b>40 CFR 63 Subpart JJJJ</b> paper and other web coating.</p>	<p>Refer to <b>40 CFR 63.3360</b></p> <p>Initial Test: within 180 days of any modification to the emission source or control device</p> <p>Additional Tests: upon written request by MCAQ or as requested by Permittee</p> <p>Additional Tests: every 5 years in accordance with 40 CFR 63 Subpart JJJJ</p>
ES0125 Coater #125 ES0127 Coater #127 ES0128 Coater #128 ES0130 Coater #130 ES0131 Coater #131 ES0132 Coater #132 ES0133 Coater #133 CDSMITH Thermal Oxidizer	<p><b>40 CFR 63.4360</b> and <b>Condition and Limitation No. C-9</b> of this permit for HAP and/or HAP destruction efficiency from <b>40 CFR 63 Subpart OOOO</b> printing, coating, and dyeing of fabrics and other textiles.</p>	<p>Refer to <b>40 CFR 63.4360</b></p> <p>Initial Test: within 180 days of any modification to the emission source or control device</p> <p>Additional Tests: upon written request by MCAQ or as requested by Permittee</p>



EMISSION SOURCE DESCRIPTION AND ID	DEMONSTRATE COMPLIANCE WITH...	SCHEDULED TESTING FREQUENCY
ES0131 Coater #131 ES0132 Coater #132 CDSMITH Thermal Oxidizer	<b>40 CFR 60.583 and Condition and Limitation No. C-13</b> of this permit for VOC and/or VOC destruction efficiency from <b>40 CFR 60 NSPS Subpart FFF</b> flexible vinyl and urethane coating and printing.	Refer to <b>40 CFR 60.583</b>  Initial Test: within 180 days of any modification to the emission source or control device  Additional Tests: upon written request by MCAQ or as requested by Permittee
ES0131 Coater #131 ES0132 Coater #132 CDSMITH Thermal Oxidizer	<b>40 CFR 60.713 and Condition and Limitation No. C-14</b> of this permit VOC and/or VOC destruction efficiency from <b>40 CFR 60 NSPS Subpart SSS</b> magnetic tape coating.	Refer to <b>40 CFR 63.713</b>  Initial Test: within 180 days of any modification to the emission source or control device  Additional Tests: upon written request by MCAQ or as requested by Permittee
ES0131 Coater #131 ES0132 Coater #132 CDSMITH Thermal Oxidizer	<b>40 CFR 60.743, and Condition and Limitation No. C-15</b> of this permit for VOC and/or VOC destruction efficiency from <b>40 CFR 60 NSPS Subpart VVV</b> polymeric coating of supporting substrates.	Refer to <b>40 CFR 63.743</b>  Initial Test: within 180 days of any modification to the emission source or control device  Additional Tests: upon written request by MCAQ or as requested by Permittee

All performance tests shall be made by, or under the direction of, a person qualified by training and/or experience in the field of air pollution testing and shall be conducted in accordance with **MCAPCO Section 2.2600 – “Source Testing.”** MCAQ shall be notified at least 60 days in advance of the proposed performance test so that it may have a representative present to observe the test at its option. The notification shall include a detailed description of the performance test procedures so that MCAQ may review and approve them. The final performance test results shall be submitted to MCAQ for review within 60 calendar days after completion of on-site testing. A record of all tests performed shall be kept for a period of 5 years and shall be made available for inspection by MCAQ personnel upon request. The performance test(s) specified in this condition do not preclude MCAQ from requesting performance testing for other emission sources or for other purposes as defined in **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, With the Approval of the Board”**, and referenced in **Facility Condition and Limitation No. A-3** of this Permit.

- C-27. In accordance with **MCAPCO Regulation 2.2614 – “Determination of VOC Emission Control System Efficiency”** paragraph (b), the control efficiency of volatile organic compound emission control systems shall be determined using the following procedures:
- A. The volatile organic compound containing material shall be sampled and analyzed using the procedures set forth in MCAPCO Section 2.2600 – “Source Testing”.
  - B. Samples of the gas stream containing volatile organic compounds shall be taken simultaneously at the inlet and outlet of the emissions control device.
  - C. The efficiency of the control device shall be expressed as a percent of the total combustible carbon content reduction achieved. The volatile organic compound mass emission rate shall be the sum of emissions from the control device and the emissions not collected by the capture system.

In accordance with Paragraph (d), capture efficiency shall be determined using the methods specified in the USEPA guidance document, EMTIC GD-035, “Guidelines for Determining Capture Efficiency” including the following criteria for permanent total enclosures:

- A. Any natural draft opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC-emitting point. (An NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.)
- B. The total area of all NDO’s shall not exceed 5 percent of the surface area of the enclosure’s walls, floor, and ceiling.
- C. The average face velocity (FV) of air through all NDO’s shall be at least 200 ft/min. (3,600 m/hr). Alternatively, measure the pressure differential across the enclosure. A pressure drop of 0.007 inches water corresponds to an FV of 200 ft/min. The direction of air flow through all NDO’s shall be into the enclosure.
- D. All access doors and windows whose areas are not included as NDO’s and are not included in the calculation of FV shall be closed during routine operation of the process.
- E. All the exhaust gases from the enclosure are directed to the control device.

C-28. The facility shall be operated in accordance with **MCAPCO Regulation 1.5111 - “General Recordkeeping: Reporting: Monitoring Requirements”, 2.0605 – “General Recordkeeping and Reporting Requirements”, and/or 2.0903 - “Recordkeeping: Reporting: Monitoring”** and **MCAPCO Regulation 1.5508 - “Permit Content”**, such that the following specific reports and/or notifications shall be submitted to MCAQ by the specified dates:

**(1) NOTIFICATIONS TO MCAQ**

POLLUTANT/ PARAMETER	NOTIFICATION REQUIREMENT	SUBMITTAL DATES
Alternate Operating Scenario AOS#1 ES0125 Coater #125 ES0127 Coater #127 ES0128 Coater #128 ES0130 Coater #130 ES0131 Coater #131 ES0132 Coater #132. ES0133 Coater #133 ESWSH2 Make ready wash area #2	For each new coating to be used under AOS#1, a written request shall be submitted to MCAQ for approval including: <ul style="list-style-type: none"> <li>• coating name and composition,</li> <li>• MSDS sheet for each coating component, and</li> <li>• Method 24 analysis of coating as applied</li> </ul> Previously approved coatings need not be resubmitted.	30 days prior to planned use
Performance test notification report	Detailed description of the proposed test procedures to be used on applicable equipment	60 days prior to proposed test date

**(2) REPORTS TO MCAQ**

<b>POLLUTANT/ PARAMETER</b>	<b>REPORTING REQUIREMENT</b>	<b>EMISSION PERIOD (For previous)</b>	<b>SUBMITTAL DATES (Postmarked by)</b>
VOC Emissions from coating lines:  ES0125 Coater #125 ES0127 Coater #127 ES0128 Coater #128 ES0130 Coater #130 ES0131 Coater #131 ES0132 Coater #132. ES0133 Coater #133  CDSMITH Thermal Oxidizer	For each coating line and associated processes which result in emissions regulated under <b>MCAPCO Regulations 2.0966</b> , provide a report of emissions to include, at a minimum, the following information: <ol style="list-style-type: none"> <li>1. process name (e.g. coating line)</li> <li>2. product code (name)</li> <li>3. number hours using coating</li> <li>4. product VOC data including                             <ul style="list-style-type: none"> <li>• coating component identification or Method 24/24A analysis data sheet</li> <li>• product density</li> <li>• total volatile wt. %</li> <li>• VOC wt. %</li> </ul> </li> <li>5. amount of product used (lb)</li> <li>6. a comparison (lbs/hr) of VOC emitted after controls and the amounts allowed by this permit for the coating operation.</li> </ol>	1 month <i>(showing emission totals for rolling 12-month emission periods)</i>	30th of the following month for the previous calendar month
VOC, HAP, PM, PM-10, CO, NO <sub>x</sub> , SO <sub>2</sub>	A report of facility-wide emissions (in tons) emanating from the emission sources listed on this permit to include, at a minimum, the following information: <ul style="list-style-type: none"> <li>• All supporting documentation, including emission calculations.  <i>(Calculations for previously submitted periods do not need to be re-submitted)</i></li> </ul>	Calendar Year <i>(showing emission totals for rolling 12-month emission periods)</i>	April 30th of the following year
Title V 6-month Monitoring Reports (MCAPCO 1.5508)	Submit a report, certified by a responsible company official, of all required monitoring parameters as found in <b>Facility Condition and Limitation No. A-16</b> and <b>Condition and Limitation No. C-21</b> . The report should include a discussion of monitoring excursions	6 months	April 30 October 30
Performance Test Report	Results of performance test(s) conducted. The report shall include a signed statement by the responsible official indicating compliance or noncompliance with the applicable emission standards.	Not applicable	Within 60 days after the test
Emission sources subject to <b>40 CFR 60 NSPS Subpart FFF</b> for flexible vinyl and urethane coating and printing.	Semiannual Compliance Reports in accordance with <b>40 CFR 60.585</b> . Refer to <b>40 CFR 60.7</b> , <b>60.585</b> and <b>Condition and Limitation No. C-13</b> of this permit for all specific reporting requirements	Refer to <b>40 CFR 60.7</b> and <b>40 CFR 60.585</b>	

POLLUTANT/ PARAMETER	REPORTING REQUIREMENT	EMISSION PERIOD (For previous)	SUBMITTAL DATES (Postmarked by)
Emission sources subject to <b>40 CFR 60 NSPS Subpart SSS</b> for magnetic tape coating	Semiannual Compliance Reports in accordance with <b>40 CFR 60.717</b> . Refer to <b>40 CFR 60.7, 60.717</b> and <b>Condition and Limitation No. C-14</b> of this permit for all specific reporting requirements	Refer to <b>40 CFR 60.7</b> and <b>40 CFR 60.717</b>	
Emission sources subject to <b>40 CFR 60 NSPS Subpart VVV</b> for polymeric coating of supporting substrates	Quarterly Compliance Reports and/or Semiannual statements if there were no reportable periods in accordance with <b>40 CFR 60.747(d)</b> . Refer to <b>40 CFR 60.7, 60.747</b> and <b>Condition and Limitation No. C-15</b> of this permit for all specific reporting requirements	Refer to <b>40 CFR 60.7</b> and <b>40 CFR 60.747</b>	
Emission sources subject to <b>40 CFR 63 MACT Subpart EE</b> for magnetic tape manufacturing	Excess emission and continuous monitoring system performance report and summary reports in accordance with <b>40 CFR 63.707(i)</b> . Refer to <b>40 CFR 63.10, 63.707</b> and <b>Condition and Limitation No. C-6</b> of this permit for specific reporting requirements	April 30 <sup>th</sup> and October 30 <sup>th</sup>	
Emission sources subject to <b>40 CFR 63 MACT Subpart JJJJ</b> for paper and other web coating	Semiannual Compliance Report in accordance with <b>40 CFR 63.3400(c)</b> . Refer to <b>40 CFR 63.10, 63.</b> and <b>Condition and Limitation No. C-8</b> of this permit for specific reporting requirements	April 30 <sup>th</sup> and October 30 <sup>th</sup>	
Emission sources subject to <b>40 CFR 63 MACT Subpart OOOO</b> for printing, coating, and dyeing of fabrics and other textiles	Semiannual Compliance Reports in accordance with <b>40 CFR 63.4311(a)</b> . Refer to <b>40 CFR 63.10, 63.4311</b> and <b>Condition and Limitation No. C-9</b> of this permit for specific reporting requirements	April 30 <sup>th</sup> and October 30 <sup>th</sup>	
Emission sources subject to <b>40 CFR 63 MACT Subpart DDDDD</b> for boilers and process heaters	Annual Compliance Reports in accordance with <b>40 CFR 63.7550(b)*</b> . Refer to <b>40 CFR 63.10, 63.7550</b> and <b>Condition and Limitation No. C-5</b> of this permit for specific reporting requirements	Refer to <b>40 CFR 63.10</b> and <b>40 CFR 63.7550</b> <i>*This report is required to be submitted electronically in EPA's Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed at <a href="https://www.epa.gov/electronic-reporting-air-emissions/cedri">https://www.epa.gov/electronic-reporting-air-emissions/cedri</a></i>	
Emission sources subject to <b>40 CFR 63 MACT Subpart EEEE</b> for organic liquids distribution	Refer to <b>40 CFR 63.10, 63.2386</b> and <b>Condition and Limitation No. C-7</b> of this permit for specific reporting requirements	Refer to <b>40 CFR 63.10</b> and <b>63.2386</b>	

**(3) COMPLIANCE CERTIFICATION TO BOTH EPA AND MCAQ**

PARAMETER	REPORTING REQUIREMENT	EMISSION PERIOD (For previous)	SUBMITTAL DATE (Postmarked by)
Certification by Responsible Official	Identify each term and condition of the Permit and the facility's compliance status for each as described in <b>Condition and Limitation No. A-33.</b>	Calendar year	April 30 of the following year

**D. LOCAL ONLY REQUIREMENTS**

Only Mecklenburg County Air Quality has the authority to enforce the terms, conditions and limitations contained in this section. The EPA does not have the authority to enforce the terms, conditions and limitations contained in this Section.

- D-1. Permit No. 19-01V-001 shall be void upon issuance of this Permit.
- D-2. In accordance with **MCAPCO Regulations 1.5711 - "Emission Rates Requiring a Permit"** and/or **2.1104 - "Toxic Air Pollutant Guidelines"**, the facility shall not emit any of the following toxic air pollutants in such quantities that may cause or contribute beyond the premises to any significant ambient air concentration that may adversely affect human health:
- carbon tetrachloride
  - ethyl acetate
  - formaldehyde
  - methyl ethyl ketone
  - toluene
  - toluene-2,4-diisocyanate

To comply with these requirements, the emission sources and associated CDSMITH thermal oxidizer control device shall be operated in accordance with the following limitations:

Pollutant	Emission Rate (lb/hr)	CDSMITH Stack / Operational Parameters				
		Chamber Temp	Gas Retention Time	Stack Height	Stack Diameter	Stack Orientation
carbon tetrachloride	0.25	Minimum: 1400 °F	Minimum 1.0 Seconds	66.0 ft	8.0 ft	Vertical, No Raincap
ethyl acetate	208.00					
formaldehyde	0.064					
methyl ethyl ketone	117.00					
toluene	94.00					
toluene-2,4-diisocyanate	0.073					

Fugitive emissions from the wash areas and from mixing coatings shall be less than or equal to the following rates:

Pollutant	Emission Rate (lb/hr)
carbon tetrachloride	0.005
ethyl acetate	40.0
formaldehyde	0.001
methyl ethyl ketone	6.53
toluene	7.4
toluene-2,4-diisocyanate	0.0017

Upon written request from MCAQ, the facility shall verify compliance with the above-specified modeling parameters and operating conditions.

D-3. The facility shall be operated in accordance with **MCAPCO Regulation 1.5111 - “General Recordkeeping: Reporting: Monitoring Requirements”**, **2.0605 – “General Recordkeeping and Reporting Requirements”**, and/or **2.0903 - “Recordkeeping: Reporting: Monitoring”** and **MCAPCO Regulation 1.5508 - “Permit Content”**, such that the following specific reports and/or notifications shall be submitted to MCAQ by the specified dates:

**(1) NOTIFICATIONS TO MCAQ**

POLLUTANT/ PARAMETER	NOTIFICATION REQUIREMENT	SUBMITTAL DATES
TAP emissions from coating lines and associated processes	For each coating line and associated processes which result in emissions regulated under <b>MCAPCO 2.1100</b> provide:  A certification signed by a responsible company official indicating: 1. the number of hours each coating process line operated (coated) each month <u>without</u> concurrent use of the associated control device; and, 2. that no regulated VOC or toxic air pollutants were emitted during this time.	30th of the following month for the previous calendar month

**(2) REPORTS TO MCAQ**

POLLUTANT/ PARAMETER	REPORTING REQUIREMENT	SUBMITTAL DATES	
TAP emissions from coating lines and associated processes: carbon tetrachloride ethyl acetate formaldehyde methyl ethyl ketone toluene toluene-2,4-diisocyanate	For each coating line and associated processes which result in toxic air pollutants regulated under <b>MCAPCO Section 1.5700</b> and <b>2.1100</b> provide:  1. a report of TAP emission rates both before and after control (lb/hr); 2. supporting documentation including emission calculations; and, 3. a comparison of toxic air pollutant emission rates (lbs/hr) after controls and the amounts allowed by this permit ( <b>Condition and Limitation D-2</b> ).	1 month <i>(showing emission totals for rolling 12-month emission periods)</i>	30th of the following month for the previous calendar month



## APPENDIX A: TOXIC AIR POLLUTANT REVIEW

*Facility Name: Transcontinental Matthews*

*Facility Address: 700 Crestdale Road, Matthews, NC 28105*

*Date Issued: April 9, 2024*

The facility has been reviewed for toxic air pollutant emissions under MCAPCO Regulation 1.5700 - “Toxic Air Pollutant Procedures” and been found to emit the following substances:

Reviewed Toxic Air Pollutant (TAP)	CAS No.	Is TAP also a Hazardous Air Pollutant (HAP)?	Last Reviewed (Permit Number)	Compliance Demonstration	
				Are Actual Emissions Above TPER?*	Model or Avoidance Limit?
carbon tetrachloride	56-23-5	Y	98-019-001	Y	Model
ethyl acetate	141-78-6	N	04-02V-001	Y	Model
formaldehyde	50-00-0	Y	98-019-001	Y	Model
n-hexane	110-54-3	Y	98-019-001	N	Model
methyl ethyl ketone	78-93-3	N	98-019-001	Y	Model
methyl isobutyl ketone	108-10-1	Y	98-019-001	N	Model
toluene	108-88-3	Y	04-02V-001	Y	Model
toluene-2,4-diisocyanate	584-84-9	Y	98-019-001	Y	Model
xylene	1330-20-7	Y	98-019-001	N	Model

*\*The toxic air pollutant permitting emission rates (TPER) for each TAP can be found in MCAPCO Regulation 1.5711 – “Emission Rates Requiring a Permit”. The applicable TPER values depend on release point type and stack characteristics.*

## **ATTACHMENT 1**

### **COMMONLY USED ABBREVIATIONS AND ACRONYMS**

BACT	Best Available Control Technology
Btu	British Thermal Unit
CAAA	Clean Air Act Amendments
CAM	Compliance Assurance Monitoring
CEDRI	Compliance and Emissions Data Reporting Interface
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EPA	Environmental Protection Agency
HAP	Hazardous Air Pollutant
HCFC	Halogenated ChloroFluoroCarbon
MACT	Maximum Achievable Control Technology
MCAPCO	Mecklenburg County Air Pollution Control Ordinance
MCAQ	Mecklenburg County Air Quality
million Btu	Million British Thermal Units
MVAC	Motor Vehicle Air Conditioner
MW	Megawatt
NCGS	North Carolina General Statute
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 micrometers
PM <sub>2.5</sub>	Particulate Matter less than 2.5 micrometers
PSD	Prevention of Significant Deterioration
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant
VOC	Volatile Organic Compound





## **ATTACHMENT 2: Operational Parameters**

*Facility Name: Transcontinental Matthews*  
*Facility Address: 700 Crestdale Road, Matthews, NC 28105*  
*Date Issued: April 9, 2024*

The facility shall be operated in accordance with **40 CFR 63.3350, 40 CFR 63.4312, 40 CFR 63.4364, 40 CFR 63.704, 40 CFR 63.706, 40 CFR 60.584, 40 CFR 60.714, 40 CFR 60.717**, and Emission Source Condition and Limitation No. C-21 of Title V Permit No. 24-01V-001 which requires the facility to maintain the following operating parameters:

<b>Control Device or Emission Source</b>	<b>Operating Parameter</b>	<b>Established Value<sup>2</sup></b>	<b>Applicable Test Date<sup>1</sup></b>
CDSMITH – Thermal Oxidizer	Chamber Temperature	1522 °F	10/12/2023

- 1. The “applicable test date” reflects the date of the performance test when the operating parameter was established.*
- 2. The 3-hr average temperature must be > 1472 °F (more than 50° below 1522 °F recent test - regulatory requirement)*