

CLASS I AIR QUALITY PERMIT

DRAFT PERMIT No. 98848

PERMITTEE: Printpack Inc.
FACILITY: Prescott Valley Facility
PLACE ID: Class I Air Quality Permit
DATE ISSUED: Date Pending
EXPIRY DATE: Date Pending

SUMMARY

This Class I air quality permit is issued to Printpack, Inc., the Permittee, for the continued operation of a flexographic printing and converting facility located at 6800 E. 2nd St., Prescott Valley, AZ, 86314. This permit renews and supersedes Permit No. 71374.

A Class I air quality permit is required because the facility's potential to emit (PTE) of volatile organic compounds (VOCs) is greater than 100 tons per year (tpy). However, a Prevention of Significant Deterioration (PSD) permit is not required as the facility's PTE of VOCs is less than 250 tpy.

This permit is issued in accordance with Arizona Revised Statutes (A.R.S.) § 49-426. It contains requirements from Title 18, Chapter 2 of the Arizona Administrative Code and Title 40 of the Code of Federal Regulations (CFR). All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) and Title 40 of the CFR, except as otherwise defined in this permit.

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ATTACHMENT "A": GENERAL PROVISIONS

I. PERMIT EXPIRATION AND RENEWAL

- A.** This permit is valid for a period of five (5) years from the date of issuance.
[A.R.S. § 49-426.F, A.A.C. R18-2-306.A.1]
- B.** The Permittee shall submit an application for renewal of this permit at least six (6) months, but not more than eighteen (18) months, prior to the date of permit expiration.
[A.A.C. R18-2-304.D.2]

II. COMPLIANCE WITH PERMIT CONDITIONS

- A.** The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona Revised Statutes (A.R.S.) Title 49, Chapter 3, and the air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
[A.A.C. R18-2-306.A.8.a]
- B.** It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
[A.A.C. R18-2-306.A.8.b]

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

- A.** The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[A.A.C. R18-2-306.A.8.c]
- B.** The permit shall be reopened and revised under any of the following circumstances:
1. Additional applicable requirements under the Clean Air Act become applicable to the Class I source. Such a reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to A.A.C. R18-2-322.B. Any permit revision required pursuant to this subparagraph shall comply with the provisions in A.A.C. R18-2-322 for permit renewal and shall reset the five-year permit term;
[A.A.C. R18-2-321.A.1.a]

IV. POSTING OF PERMIT

2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit;

[A.A.C. R18-2-321.A.1.b]

3. The Director or the Administrator determines 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; and

[A.A.C. R18-2-321.A.1.c]

4. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

[A.A.C. R18-2-321.A.1.d]

- C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall, except for reopenings under Condition III.B.1 above, affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in Condition III.B.1 above shall not result in a resetting of the five-year permit term.

[A.A.C. R18-2-321.A.2]

IV. POSTING OF PERMIT

- A. The Permittee shall post this permit or a certificate of permit issuance at the facility in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:

[A.A.C. R18-2-315.A]

1. Current permit number; or
2. Serial number or other equipment identification number (equipment ID number) that is also listed in the permit to identify that piece of equipment.

- B. A copy of the complete permit shall be kept on site.

[A.A.C. R18-2-315.B]

V. FEE PAYMENT

The Permittee shall pay fees to the Director pursuant to A.R.S § 49-426(E) and A.A.C. R18-2-326.

[A.A.C. R18-2-306.A.9 and -326]

VI. EMISSIONS INVENTORY QUESTIONNAIRE

- A. The Permittee shall complete and submit to the Director an emissions inventory questionnaire no later than June 1 of each year.

[A.A.C. R18-2-327.A.1.a]

VII. COMPLIANCE CERTIFICATION

- B.** The emissions inventory questionnaire shall be on an electronic or paper form provided by the Director and shall include the information required by A.A.C. R18-2-327.A.3 for the previous calendar year.

[A.A.C. R18-2-327.A.3]

- C.** The Permittee shall submit to the Director an amendment to an emissions inventory questionnaire, containing the documentation required by A.A.C. R18-2-327.A.3, whenever the Permittee discovers or receives notice, within two years of the original submittal, that incorrect or insufficient information was submitted to the Director by a previous emissions inventory questionnaire. The amendment shall be submitted to the Director within 30 days of discovery or receipt of notice. If the incorrect or insufficient information resulted in an incorrect annual emissions fee, the Director shall require that additional payment be made or shall apply an amount as a credit to a future annual emissions fee. The submittal of an amendment shall not subject the Permittee to an enforcement action or a civil or criminal penalty if the original submittal of incorrect or insufficient information was not due to willful neglect.

[A.A.C. R18-2-327.A.4]

VII. COMPLIANCE CERTIFICATION

- A.** The Permittee shall submit a compliance certification to the Director semiannually, which describes the compliance status of the source with respect to each permit condition. The first certification shall be submitted no later than May 15th, and shall report the compliance status of the source during the period between October 1st of the previous year and March 31st of the current year. The second certification shall be submitted no later than November 15th, and shall report the compliance status of the source during the period between April 1st and September 30th of the current year.

[A.A.C. R18-2-309.2.a]

- B.** The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;
2. Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period;
3. Status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certifications shall identify each deviation (including any deviations reported pursuant to Condition XI.B of this Attachment) during the period covered by the certification and take it into account for consideration in the compliance certification;

[A.A.C. R18-2-309.2.c.i]

[A.A.C. R18-2-309.2.c.ii]

[A.A.C. R18-2-309.2.c.iii]

4. For emission units subject to 40 CFR Part 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is

required and in which an excursion or exceedance defined under 40 CFR Part 64 occurred;

[A.A.C. R18-2-309.2.c.iii]

5. Other facts the Director may require to determine the compliance status of the source.

[A.A.C. R18-2-309.2.c.iv]

- C. A copy of all compliance certifications shall also be submitted to the EPA Administrator.
[A.A.C. R18-2-309.2.d]

- D. If any outstanding compliance schedule exists, a progress report shall be submitted with the semi-annual compliance certifications required in Condition VII.A above. The progress reports shall contain the information required by A.A.C. R18-2-309.5.d.

[A.A.C. R18-2-309.5.d]

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[A.A.C. R18-2-309.3]

IX. INSPECTION AND ENTRY

Upon presentation of proper credentials, the Permittee shall allow the Director or the authorized representative of the Director to:

- A. Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

[A.A.C. R18-2-309.4.a]

- B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

[A.A.C. R18-2-309.4.b]

- C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

[A.A.C. R18-2-309.4.c]

- D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

[A.A.C. R18-2-309.4.d]

- E. Record any inspection by use of written, electronic, magnetic and photographic media.

[A.A.C. R18-2-309.4.e]

X. ACCIDENTAL RELEASE PROGRAM

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the time line specified in 40 CFR Part 68.

[40 CFR Part 68]

XI. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting

1. Excess emissions shall be reported as follows:

a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:

[A.A.C. R18-2-310.01.A]

(1) Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XI.A.1.b below.

[A.A.C. R18-2-310.01.A.1]

(2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XI.A.1.a(1) above.

[A.A.C. R18-2-310.01.A.2]

b. The report shall contain the following information:

(1) Identity of each stack or other emission point where the excess emissions occurred;

[A.A.C. R18-2-310.01.B.1]

(2) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;

[A.A.C. R18-2-310.01.B.2]

(3) Time and duration, or expected duration, of the excess emissions;

[A.A.C. R18-2-310.01.B.3]

(4) Identity of the equipment from which the excess emissions emanated;

[A.A.C. R18-2-310.01.B.4]

(5) Nature and cause of such emissions;

[A.A.C. R18-2-310.01.B.5]

(6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;

[A.A.C. R18-2-310.01.B.6]

- (7) Steps that were or are being taken to limit the excess emissions;
and

[A.A.C. R18-2-310.01.B.7]

- (8) If the excess emissions resulted from startup or malfunction, the report shall contain a list of the steps taken to comply with any permit procedures governing source operation during periods of startup or malfunction.

[A.A.C. R18-2-310.01.B.8]

2. In the case of continuous or recurring excess emissions, the notification requirements shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional notification pursuant to Condition XI.A.1 above.

[A.A.C. R18-2-310.01.C]

B. Permit Deviations Reporting

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule:

[A.A.C. R18-2-306.A.5.b]

1. Notice that complies with Condition XI.A.1 above is prompt for deviations that constitute excess emissions;
2. Notice that is submitted within two (2) working days of discovery of the deviation is prompt for deviations of permit conditions identified by Condition I.C.1 of Attachment "B";
3. Except as provided in Conditions XI.B.1 and 2 above, prompt notification of all other types of deviations shall be every 6 months, concurrent with the semi-annual compliance certifications required in Section VII, and can be submitted via myDEQ, the Arizona Department of Environmental Quality's online portal.

[A.A.C. R18-2-306.A.5.b.i]

[A.A.C. R18-2-306.A.5.b.ii]

[A.A.C. R18-2-306.A.5.b.ii]

C. Emergency Provision

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes

the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[A.A.C. R18-2-306.E.1]

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if Condition XI.C.3 below is met.

[A.A.C. R18-2-306.E.2]

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

[A.A.C. R18-2-306.E.3]

- a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

[A.A.C. R18-2-306.E.3.a]

- b. The permitted facility was being properly operated at the time of the emergency;

[A.A.C. R18-2-306.E.3.b]

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

[A.A.C. R18-2-306.E.3.c]

- d. The Permittee submitted notice of the emergency to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

[A.A.C. R18-2-306.E.3.d]

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

[A.A.C. R18-2-306.E.4]

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[A.A.C. R18-2-306.E.5]

D. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown

1. Applicability

A.A.C. R18-2-310 establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- a. Promulgated pursuant to Sections 111 or 112 of the Act;
[A.A.C. R18-2-310.A.1]
[State Enforceable Only]
- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;
[A.A.C. R18-2-310.A.2]
[State Enforceable Only]
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;
[A.A.C. R18-2-310.A.3]
[State Enforceable Only]
- d. Contained in A.A.C. R18-2-715.F; or
[A.A.C. R18-2-310.A.4]
[State Enforceable Only]
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.
[A.A.C. R18-2-310.A.5]

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

- [A.A.C. R18-2-310.B]
[State Enforceable Only]
- a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;
[A.A.C. R18-2-310.B.1]
[State Enforceable Only]
- b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
[A.A.C. R18-2-310.B.2]
[State Enforceable Only]
- c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;
[A.A.C. R18-2-310.B.3]
[State Enforceable Only]

- d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- [A.A.C. R18-2-310.B.4]
[State Enforceable Only]
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- [A.A.C. R18-2-310.B.5]
[State Enforceable Only]
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- [A.A.C. R18-2-310.B.6]
[State Enforceable Only]
- g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
- [A.A.C. R18-2-310.B.7]
[State Enforceable Only]
- h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
- [A.A.C. R18-2-310.B.8]
[State Enforceable Only]
- i. All emissions monitoring systems were kept in operation if at all practicable; and
- [A.A.C. R18-2-310.B.9]
[State Enforceable Only]
- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.
- [A.A.C. R18-2-310.B.10]
[State Enforceable Only]

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in Condition XI.E.3.b below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

[A.A.C. R18-2-310.C.1]
[State Enforceable Only]

- (1) The excess emissions could not have been prevented through careful and prudent planning and design;
[A.A.C. R18-2-310.C.1.a]
[State Enforceable Only]
 - (2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
[A.A.C. R18-2-310.C.1.b]
[State Enforceable Only]
 - (3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
[A.A.C. R18-2-310.C.1.c]
[State Enforceable Only]
 - (4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
[A.A.C. R18-2-310.C.1.d]
[State Enforceable Only]
 - (5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
[A.A.C. R18-2-310.C.1.e]
[State Enforceable Only]
 - (6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
[A.A.C. R18-2-310.C.1.f]
[State Enforceable Only]
 - (7) All emissions monitoring systems were kept in operation if at all practicable; and
[A.A.C. R18-2-310.C.1.g]
[State Enforceable Only]
 - (8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.
[A.A.C. R18-2-310.C.1.h]
[State Enforceable Only]
- b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition XI.E.2 above.
[A.A.C. R18-2-310.C.2]
[State Enforceable Only]

4. Affirmative Defense for Malfunctions during Scheduled Maintenance

XII. RECORDKEEPING REQUIREMENTS

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to Condition XI.E.2 above.

[A.A.C. R18-2-310.D]
[State Enforceable Only]

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XI.E.2 or XI.E.3, the Permittee shall demonstrate, through submission of the data and information required by this Condition XI.E and Condition XI.A.1 above, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

[A.A.C. R18-2-310.E]
[State Enforceable Only]

XII. RECORDKEEPING REQUIREMENTS

A. The Permittee shall keep records of all required monitoring information including, but not limited to, the following:

[A.A.C. R18-2-306.A.4.a]

1. The date, place as defined in the permit, and time of sampling or measurements;
[A.A.C. R18-2-306.A.4.a.i]

2. The date(s) any analyses were performed;
[A.A.C. R18-2-306.A.4.a.ii]

3. The name of the company or entity that performed the analyses;
[A.A.C. R18-2-306.A.4.a.iii]

4. A description of the analytical techniques or methods used;
[A.A.C. R18-2-306.A.4.a.iv]

5. The results of analyses; and
[A.A.C. R18-2-306.A.4.a.v]

6. The operating conditions as existing at the time of sampling or measurement.
[A.A.C. R18-2-306.A.4.a.vi]

B. The Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[A.A.C. R18-2-306.A.4.b]

XIII. REPORTING REQUIREMENTS

The Permittee shall submit the following reports:

A. Compliance certifications in accordance with Section 0 above.

[A.A.C. R18-2-306.A.5.a]

- B.** Excess emission; permit deviation, and emergency reports in accordance with Section XI above.

[A.A.C. R18-2-306.A.5.b]

- C.** Other reports required by any condition of Attachment “B”.

[A.A.C. R18-2-306.A.5.a]

XIV. DUTY TO PROVIDE INFORMATION

- A.** The Permittee shall furnish to the Director, within a reasonable time, any information that the Director may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.

[A.A.C. R18-2-304.G and -306.A.8.e]

- B.** If the Permittee has failed to submit any relevant facts or has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[A.A.C. R18-2-304.H]

XV. PERMIT AMENDMENT OR REVISION

The Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under Section XVI below, as follows:

- A.** Administrative Permit Amendment;

[A.A.C. R18-2-318]

- B.** Minor Permit Revision; and

[A.A.C. R18-2-319]

- C.** Significant Permit Revision

[A.A.C. R18-2-320]

The applicability and requirements for such action are defined in the above referenced regulations.

XVI. FACILITY CHANGE WITHOUT A PERMIT REVISION

- A.** The Permittee may make changes that contravene an express permit term without a permit revision if all of the following apply:

1. The changes are not modifications under any provision of Title I of the Act or under A.R.S § 49-401.01(24);

[A.A.C. R18-2-317.A.1]

2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;
[A.A.C. R18-2-317.A.2]
 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;
[A.A.C. R18-2-317.A.3]
 4. The changes satisfy all requirements for a minor permit revision under A.A.C. R18-2-319.A;
[A.A.C. R18-2-317.A.4]
 5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements; and
[A.A.C. R18-2-317.A.5]
 6. The changes do not constitute a minor NSR modification.
[A.A.C. R18-2-317.A.6]
- B.** The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if it meets all of the requirements of Conditions XVI.A, C, and D of this Attachment.
[A.A.C. R18-2-317.B]
- C.** For each change under Conditions XVI.A and XVI.B above, a written notice by certified mail or hand delivery shall be received by the Director and the Administrator a minimum of 7 working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change, but must be provided as far in advance of the change, as possible or, if advance notification is not practicable, as soon after the change as possible.
[A.A.C. R18-2-317.D]
- D.** Each notification shall include:
1. When the proposed change will occur;
[A.A.C. R18-2-317.E.1]
 2. A description of the change;
[A.A.C. R18-2-317.E.2]
 3. Any change in emissions of regulated air pollutants; and
[A.A.C. R18-2-317.E.3]
 4. Any permit term or condition that is no longer applicable as a result of the change.
[A.A.C. R18-2-317.E.7]
- E.** The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section XVI.
[A.A.C. R18-2-317.F]

XVII. TESTING REQUIREMENTS

- F. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under A.A.C. R18-2-306.A.11 shall not require any prior notice under this Section XVI.

[A.A.C. R18-2-317.G]

- G. Notwithstanding any other part of Section XVI, the Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the same source under Section XVI over the term of the permit, do not satisfy Condition XVI.A above.

[A.A.C. R18-2-319.I]

XVII. TESTING REQUIREMENTS

- A. Except as provided in Condition XVII.F below, the Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

[A.A.C. R18-2-312.A]

- B. Operational Conditions during Performance Testing

Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the source. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the performance tests. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative conditions of performance tests unless otherwise specified in the applicable standard.

[A.A.C. R18-2-312.C]

- C. Performance Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.

[A.A.C. R18-2-312.B]

- D. Test Plan

At least 14 working days prior to performing a test, the Permittee shall submit a test plan to the Director, which must include the following, in addition to all other applicable requirements, as identified in the Arizona Testing Manual:

[A.A.C. R18-2-312.B and D]

1. Test duration;
2. Test location(s);
3. Test method(s); and
4. Source operation and other parameters that may affect test results.

- E. Stack Sampling Facilities

The Permittee shall provide, or cause to be provided, performance testing facilities as follows:

[A.A.C. R18-2-312.E]

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platform(s);
3. Safe access to sampling platform(s); and
4. Utilities for sampling and testing equipment.

F. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the Director or the Director's designee is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

[A.A.C. R18-2-312.F]

G. Report of Final Test Results

A written report of the results of performance tests conducted pursuant to 40 CFR 63, shall be submitted to the Director within 60 days after the test is performed. A written report of the results of all other performance tests shall be submitted within 4 weeks after the completion of the testing as specified in the Arizona Testing Manual. All performance testing reports shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

[A.A.C. R18-2-312.A and B]

H. Extension of Performance Test Deadline

For performance testing required under Condition XVII.A above, the Permittee may request an extension to a performance test deadline due to a force majeure event as follows:

[A.A.C. R18-2-312.J]

1. If a force majeure event is about to occur, occurs, or has occurred for which the Permittee intends to assert a claim of force majeure, the Permittee shall notify the

XVIII. PROPERTY RIGHTS

Director in writing as soon as practicable following the date the Permittee first knew, or through due diligence should have known that the event may cause or caused a delay in testing beyond the regulatory deadline. The notification must occur before the performance test deadline unless the initial force majeure or a subsequent force majeure event delays the notice, and in such cases, the notification shall be given as soon as practicable.

[A.A.C. R18-2-312.J.1]

2. The Permittee shall provide to the Director a written description of the force majeure event and a rationale for attributing the delay in testing beyond the regulatory deadline to the force majeure; describe the measures taken or to be taken to minimize the delay; and identify a date by which the Permittee proposes to conduct the performance test. The performance test shall be conducted as soon as practicable after the force majeure event occurs.

[A.A.C. R18-2-312.J.2]

3. The decision as to whether or not to grant an extension to the performance test deadline is solely within the discretion of the Director. The Director shall notify the Permittee in writing of approval or disapproval of the request for an extension as soon as practicable.

[A.A.C. R18-2-312.J.3]

4. Until an extension of the performance test deadline has been approved by the Director under Conditions XVII.H.1, 2, and 3 above, the Permittee remains subject to the requirements of Section XVII.

[A.A.C. R18-2-312.J.4]

5. For purposes of this Section XVII, a “force majeure event” means an event that will be or has been caused by circumstances beyond the control of the Permittee, its contractors, or any entity controlled by the Permittee that prevents it from complying with the regulatory requirement to conduct performance tests within the specified timeframe despite the Permittee's best efforts to fulfill the obligation. Examples of such events are acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond the control of the Permittee.

[A.A.C. R18-2-312.J.5]

XVIII. PROPERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.

[A.A.C. R18-2-306.A.8.d]

XIX. SEVERABILITY CLAUSE

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

[A.A.C. R18-2-306.A.7]

XX. PERMIT SHIELD

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled "Permit Shield". The permit shield shall not apply to minor revisions pursuant to Condition XV.B of this Attachment and any facility changes without a permit revision pursuant to Condition XVI of this Attachment.

[A.A.C. R18-2-317.F, - 320, and -325]

XXI. PROTECTION OF STRATOSPHERIC OZONE

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

[40 CFR Part 82]

XXII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS

For all equipment subject to a New Source Performance Standard or a National Emission Standard for Hazardous Air Pollutants, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulations.

[40 CFR Part 60 Subpart A and Part 63 Subpart A]

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ATTACHMENT "B": SPECIFIC CONDITIONS

I. FACILITY-WIDE REQUIREMENTS

A. Opacity

1. Instantaneous Surveys and Six-Minute Observations

a. Instantaneous Surveys

Any instantaneous survey required by this permit shall be determined by either option listed in Conditions I.A.1.a(1) and (2):

[A.A.C. R18-2-311.B]

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee's representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within 30 minutes.

(2) EPA Reference Method 9 Certified Observer.

[A.A.C. R18-2-306.A.3.c]

b. Six-Minute Observations

Any six-minute observation required by this permit shall be determined by either option listed in Conditions I.A.1.b(1) and (2):

[A.A.C. R18-2-311.B]

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within 30 minutes.

(2) EPA Reference Method 9.

c. The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all six-minute Method 9 observations required by this permit are conducted as a six-minute Alternative Method ALT-082 (Digital Camera Operating Technique) and all instantaneous visual surveys required by this permit are conducted as an instantaneous ALT-082 camera survey. Any six-minute Method 9 observation required by this permit can be conducted as a six-minute Alternative Method ALT-082

I. FACILITY-WIDE REQUIREMENTS

and any instantaneous visual survey required by this permit can be conducted as an instantaneous ALT-082 camera survey.

[A.A.C. R18-2-306.A.3.c]

2. Monitoring, Recordkeeping, and Reporting Requirements

[A.A.C. R18-2-306.A.3.c]

- a. At the frequency specified in the following sections of this permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack sources, when in operation, and fugitive dust sources.
- b. If the visible emissions on an instantaneous basis appears less than or equal to the applicable opacity standard, then the Permittee shall keep a record of the name of the observer, the date on which the instantaneous survey was made, and the results of the instantaneous survey.
- c. If the visible emissions on an instantaneous basis appears greater than the applicable opacity standard, then the Permittee shall immediately conduct a six-minute observation of the visible emissions.
 - (1) If the six-minute observation of the visible emissions is less than or equal to the applicable opacity standard, then the Permittee shall record the name of the observer, the date on which the six-minute observation was made, and the results of the six-minute observation.
 - (2) If the six-minute observation of the visible emissions is greater than the applicable opacity standard, then the Permittee shall do the following:
 - (a) Adjust or repair the controls or equipment to reduce opacity to less than or equal to the opacity standard;
 - (b) Record the name of the observer, the date on which the six-minute observation was made, the results of the six-minute observation, and all corrective action taken; and
 - (c) Report the event as an excess emission for opacity in accordance with Condition XI.A of Attachment "A".
 - (d) Conduct another six-minute observation to document the effectiveness of the adjustments or repairs completed.

B. General Requirements for Compliance Assurance Monitoring (CAM)

The following requirements shall be applicable to any equipment that is subject to CAM requirements:

1. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable,

I. FACILITY-WIDE REQUIREMENTS

calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emission points are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The Permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

2. Response to Excursions

a. Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emission point (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable, but no later than 24 hours following detection of an excursion, in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction, and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operations to within the indicator range, designated condition, or below applicable emission limitation or standard, as applicable.

[40 CFR 64.7(d)(1)]

b. Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation, and maintenance procedures and records, and inspection of the control device, associated capture system, and process.

[40 CFR 64.7(d)(2)]

3. If the Permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify ADEQ, and if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conduction monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

I. FACILITY-WIDE REQUIREMENTS

4. Excursions shall be reported as required by Condition VII.B.4 of Attachment “A” of this permit. The compliance certification shall include, at a minimum, the following:

[A.A.C. R18-2-309(2)(c)(iii)]

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursion or exceedances, as applicable, and the corrective actions taken; and
[40 CFR 64.9(a) (2)(i)]

- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable)
[40 CFR 64.9(a) (2)(ii)]

C. Recordkeeping and Reporting Requirements

1. Deviations from the following Attachment “B” permit conditions shall be promptly reported in accordance with Condition XI.B.2 of Attachment “A”:

[A.A.C. R18-2-306.A.5.b]

- a. Conditions III.B.1, III.B.2, III.B.3, III.B.4, III.B.5, III.B.6 and III.B.7

- b. Regenerative Thermal Oxidizer (I02)

- (1) *The Permittee shall validate the combustion chamber temperature sensor as per the manufacturer’s guidelines, at a minimum frequency of once per year.*

[A.A.C. R 8-2-331.A.3.c]

[Material Permit Condition identified by italics and underline]

- (2) The Permittee shall record the temperature of the combustion chamber every fifteen minutes on a temperature chart or on an electronic data logger. For each hour the regenerative thermal oxidizer is in operation to control VOC emissions, the Permittee shall record four readings. The average temperature shall be calculated as a 3 hour rolling average.

[A.A.C. R18-2-306.A.3.c]

- (3) The Permittee shall take corrective action following the discovery of any abnormal operation of RTO-I02 or the combustion chamber temperature monitoring system as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[A.A.C. R18-2-306.A.3.c]

- c. AL-32 Bypass Damper Inspection

- (1) The Permittee shall complete a visual, audio, and olfactory (AVO) operational inspection of each AL-32 bypass damper once every

I. FACILITY-WIDE REQUIREMENTS

month. The inspection shall document any evidence of leaks or improper orientation.

[A.A.C. R18-2-306.A.3.c]

- (2) If any conditions of improper operation or sealing are observed during the monthly inspection, the Permittee shall complete the necessary repairs prior to continuing production operation of AL-32.

[A.A.C. R18-2-306.A.3.c]

2. The Permittee shall maintain, on-site, records of the manufacturer supplied operations and maintenance instructions or Operation and Maintenance Plan for minimizing emissions for all equipment identified in Attachment "C".

[A.A.C. R18-2-306.A.3.c]

3. The Permittee shall submit reports of all monitoring activities required in Attachment "B" along with the compliance certifications required by Section VII of Attachment "A."

[A.A.C. R18-2-306.A.5.a]

D. Operational Limitations and Standards

1. Operation and Maintenance

The Permittee shall operate all equipment identified in Attachment "C" in accordance with vendor-supplied operations and maintenance instructions. If vendor-supplied operations and maintenance instructions are not available, the Permittee shall prepare an Operation and Maintenance Plan, which provides adequate information to properly operate and maintain the equipment in good working order. In the absence of vendor-supplied operations and maintenance instructions, the Permittee shall operate the equipment in accordance with the Operation and Maintenance Plan.

[A.A.C. R18-2-306.A.01]

2. Emission Limitation and Standards

- a. *The Permittee shall not discharge or cause to be discharged into the atmosphere from the facility volatile organic compound (VOC) emissions that exceed 225 tons per year, based on a 12-month rolling total*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Condition identified by italics and underline]

- b. *The Permittee shall use less than 9 tons of any individual federal hazardous air pollutant (HAP), and less than 22.5 tons of any combination of federal HAPs based on a 12-month rolling total.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Condition identified by italics and underline]

- c. The Permittee shall not emit gaseous or odorous materials from equipment, operations, or premises under their control in such quantities or concentrations as to cause air pollution.

I. FACILITY-WIDE REQUIREMENTS

[A.A.C. R18-2-730.D]

- d. The Permittee shall not process, store, use, or transport materials including solvents or other volatile compounds in such a manner and by such means that they will evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution.

[A.A.C. R18-2-730.F]

- e. Where a stack, vent, or other outlet is at such a level that odor, smoke, vapor or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet by the Permittee to a degree that will adequately dilute, reduce, or eliminate the discharge of air pollution into adjoining property.

[A.A.C. R18-2-730.G]

3. Monitoring, Recordkeeping, and Reporting Requirements

a. Operations and Maintenance

The Permittee shall maintain, on-site, records of the manufacturer's specifications or Operation and Maintenance Plan for minimizing emissions for all process and control equipment listed in Attachment "C".

[A.A.C. R18-2-306.A.4]

b. VOC Emissions

- (1) The Permittee shall keep records of purchase orders, invoices, and either certified product data sheets or manufacturer formulation data sheets for all materials containing VOCs.

[A.A.C. R18-2-306 A.3.c]

- (2) The Permittee shall maintain a log every month of each ink, coat, adhesive and solvent material containing VOCs: Presses 01 and 04, Outboard Coater OP-03, Extruder/Laminator EL-31, Laminator/Coater AL-32, Parts and Plate Washers, as well as ink preparation, cleanup and other associated support operations. Supporting records used to develop the log, including purchase orders, invoices, production usage logs and safety data sheets (SDS) necessary to verify the type and amount of each material used, shall be maintained on site and shall be readily available to ADEQ upon request.

[A.A.C. R18-2-306 A.3.c]

- (3) The Permittee shall process the monthly log of materials containing VOCs described in Condition I.D.3.b(2) through a materials management database to convert the data to VOC total emissions, taking into account the status of each emission unit, process or activity as uncaptured or captured, controlled or

I. FACILITY-WIDE REQUIREMENTS

uncontrolled as well as its respective control efficiency for controlled emissions.

[A.A.C. R18-2-306 A.3.c]

(a) The Permittee shall use 97.5% for I02 or the control efficiency documented in the most recent performance test results approved by ADEQ.

(b) The Permittee shall include emissions from solvent storage tanks ST-01 through ST-05 in the monthly log of emissions.

(4) Each month, the Permittee shall record a total of VOC emissions in tons per month (tpm).

[A.A.C. R18-2-306 A.3.c]

(5) The total monthly VOC emissions shall be added to the total monthly VOC emissions for each of the previous consecutive 11 calendar months to establish the 12-month rolling total emissions for the facility. This rolling 12-month VOC emissions total shall be used to determine compliance with the emission limitation specified in Condition I.D.2.a.

[A.A.C. R18-2-306 A.3.c]

c. HAP Emissions

[A.A.C. R18-2-306.A.3.c]

(1) The Permittee shall keep records of purchase orders, invoices, and either certified product data sheets or manufacturer formulation data sheets for all HAP containing materials.

(2) Monthly usage of all HAP containing materials shall be recorded. Based on the HAP content in each material, the monthly total of HAPs consumed shall be calculated and recorded.

(3) At the end of each month, the Permittee shall calculate the rolling 12-month totals of all HAPs consumed to show compliance with Condition I.D.2.a.

4. Permit Shield

[A.A.C. R18-2-325]

Compliance with the Conditions of this Subsection shall be deemed compliance with A.A.C R18-2-730.D, F, and G.

E. National Emission Standards for Hazardous Air Pollutants

1. The existing facility, at which wide-web flexographic printing presses are operated, is subject to the provisions of 40 CFR 63 Subpart KK - National Emission Standards for the Printing and Publishing Industry. Compliance with the

requirements of Conditions I.D.2.a of Attachment “B” of this permit establish the facility to be an area source with respect to 40 CFR 63 Subpart KK and thus, the Permittee is only subject to certain recordkeeping and notification requirements of Subpart KK.

[40 CFR 63.820(a)(2) and (3)]

2. Compliance with Condition I.D.3.c of Attachment “B” of this permit meets the applicable recordkeeping requirements of 40 CFR 63.829(d).

[40 CFR 63.829(d)]

3. Compliance with Condition XV Attachment “A” of this permit meets the applicable notification requirements of 40 CFR 63.830(b)(1).

[40 CFR 63.830(b)(1)]

II. ALTERNATE OPERATING SCENARIO USING LOW VOC MATERIALS

A. Applicability

This Section is applicable to Laminator AL-32 when operated under Alternate Operating Scenario 1 (AOS-1), which is defined as operating with water-based, or other coating formulations that contain no more than 1% VOC by weight.

B. Operational Limitations

1. The Permittee may direct exhaust emissions from AL-32 to the atmosphere only when operating with water-based, or other coating formulations that contain no more than 1% VOCs by weight.

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Condition identified by italics and underline]

2. All operations of AL-32 other than AOS-1 are subject to the Conditions of Section III of this Attachment.

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Condition identified by italics and underline]

3. The exhaust ductwork of AL-32 shall be equipped with sensors, controls and interlocks to prevent the diversion of exhaust to the atmosphere any time the concentration of VOCs in the exhaust stream is greater than 5% of the lower explosion limit of propane.

[A.A.C. R18-2-331.A.3.c]

[Material Permit Condition identified by italics and underline]

C. Monitoring, Recordkeeping, and Reporting Requirements

1. The Permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a damper position indicator at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.

[A.A.C. R18-2-306.01 & -331.A.3.a]

[Material Permit Condition identified by italics and underline]

III. VOC CAPTURE AND CONTROL

2. The Permittee shall at all times the process is operating, continuously monitor as practicable, and record, electronically, or by chart recorder, whether the flow is directed to the control device or diverted to atmosphere. This record shall be maintained on site and readily available to ADEQ upon request.
[A.A.C. R18-2-306.A.4]
3. The Permittee shall contemporaneously with making the change from one operating scenario to another, record in a log or other electronic means a record of the scenario under which it is operating. This log shall be maintained on site and readily available to ADEQ upon request.
[A.A.C. R18-2-306.A.4 and -A.11.a]

III. VOC CAPTURE AND CONTROL

A. Applicability

1. This Section is applicable to Presses 01 and 04, coaters associated with Presses 01, Coater OP-03, the press room total enclosure, the equipment enclosures for Press 04, Parts Washers PW-01, and PW-03, the Solvent Distillation Tank, Solvent Storage Tanks ST-04 and ST-05 and the associated ink, solvent and adhesive material handling support operations at the facility.
2. This Section is applicable to Laminator AL-32 and the equipment enclosures for Laminator AL-32, except when operating under AOS-1 per the requirements of Section II of this Attachment.
3. This Section is applicable to Regenerative Thermal Oxidizer I02.

B. Air Pollution Control Requirements

1. *The Permittee shall maintain and operate VOC capture systems in accordance with manufacturer's specifications and consistent with good air pollution control practice to capture 100% of VOC emissions from the equipment and processes identified in Conditions III.A.1 and III.A.2 at all times when VOC containing materials are being processed including associated and support material handling and cleaning operations. If all applicable sources are shutdown, VOC containing materials are closed, and cleaning operations ceased, the VOC collection and control system may be shutdown.*

[A.A.C. R18-2-331.A.3.e]

[Material Permit Condition identified by italics and underline]

2. *The Permittee shall maintain and operate regenerative thermal oxidizer (I02) in accordance with manufacturer's specifications and consistent with good air pollution control practice to control emissions from the equipment and processes identified in Conditions III.A.1 and III.A.2 at all times when VOC containing materials are being processed including associated and support material handling and cleaning operations.* The Permittee shall make the manufacturer's specifications available to ADEQ upon request.

[A.A.C. R18-2-331.A.3.e]

[Material Permit Condition identified by italics and underline]

3. Presses 01 and 04, associated coaters and Laminator AL-32 shall each have an interlock device to prevent their operation unless the regenerative thermal oxidizer (I02) temperature to which the emissions are routed has reached the minimum operating temperature and minimum pressure specified in Condition III.B.5.a(1) and Condition III.B.5.a(2), as appropriate.

[A.A.C. R18-2-.331.A.3.e]

[Material Permit Condition identified by italics and underline]

4. The exhaust ductwork of AL-32 shall be equipped with sensors, controls and interlocks to prevent the diversion of exhaust to atmosphere any time the concentration of VOC in the exhaust stream is greater than 5% of the lower explosion limit of propane.

[A.A.C. R18-2-306.A.01 and -331.A.3.c]

[Material Permit Condition identified by italics and underline]

5. Thermal Oxidizing Control Devices

a. Regenerative Thermal Oxidizer (I02)

- (1) The Permittee shall maintain the average combustion chamber temperature reported from the most recent performance test results approved by ADEQ as the minimum average temperature for normal operation of the regenerative thermal oxidizer (I02). Prior to obtaining results from the initial performance test, the Permittee shall maintain 1500 °F as the minimum average combustion chamber temperature.

[A.A.C. R18-2-306.A.01 and -331.A.3.e]

[Material Permit Condition identified by italics and underline]

- (2) The Permittee shall maintain the average static pressure in the final trunk line inlet duct prior to the regenerative thermal oxidizer blower, at a pressure no less negative than that specified based upon final system design. The Permittee shall assure the static pressure specified by final system design will maintain a minimum negative pressure of -0.007 inches of water at each permanent enclosure under all representative operating conditions. Prior to placing the regenerative thermal oxidizer (I02) in operation as a control device, the Permittee shall provide notification to the Director of the static pressure specified by final system design.

[A.A.C. R18-2-306.A.01 and -331.A.3.e]

[Material Permit Condition identified by italics and underline]

- (3) The regenerative thermal oxidizer (I02) shall have a minimum VOC destruction efficiency of 97.5 percent.

[A.A.C. R18-2-306.A.01 and -331.A.3.e]

[Material Permit Condition identified by italics and underline]

III. VOC CAPTURE AND CONTROL

6. Permanent Total Enclosures (PTE)

a. This Section is applicable to:

- (1) The Press Room PTE;
- (2) Each material handling area PTE for Press 4; and
- (3) Each material handling area PTE for Laminator/Coater AL-32.

b. The Permittee shall ensure that each PTE conforms to the following 4-point criteria:

[A.A.C. R18-2-306.01]

- (1) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
- (2) The total area of all NDO's shall not exceed 5 percent of the surface area of enclosure's four walls, floor, and ceiling.
- (3) The average facial velocity of air through all NDO's shall be at least 3600 m/hr (200 fpm). The direction of airflow through all NDO's shall be into the enclosure.
- (4) All access doors and windows whose areas are not included in Condition III.B.6.b(2) and are not included in the calculation of Condition III.B.6.b(3) shall be closed during routine operation of the process.

C. Monitoring, Recordkeeping, and Reporting Requirements

1. Regenerative Thermal Oxidizer (I02)

a. *The Permittee shall validate the combustion chamber temperature sensor as per the manufacturer's guidelines, at a minimum frequency of once per year.*

[A.A.C. R 8-2-306.A.01 and -331.A.3.c]

[Material Permit Condition identified by italics and underline]

b. The Permittee shall record the temperature of the combustion chamber every fifteen minutes on a temperature chart or on an electronic data logger. For each hour the regenerative thermal oxidizer (I02) is in operation to control VOC emissions, the Permittee shall record four readings. The average temperature shall be calculated as a 3-hour rolling average.

[A.A.C. R18-2-306.A.3.c]

c. The Permittee shall take corrective action following the discovery of any abnormal operation of regenerative thermal oxidizer (I02) or the

III. VOC CAPTURE AND CONTROL

combustion chamber temperature monitoring system as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[A.A.C. R18-2-306.A.3.c]

2. AL-32 Bypass Damper Inspection

- a. The Permittee shall complete a visual, audio, and olfactory (AVO) operational inspection of each AL-32 bypass damper once every month. The inspection shall document any evidence of leaks or improper orientation.

[A.A.C. R18-2-306.A.3.c]

- b. If any conditions of improper operation or sealing are observed during the monthly inspection, the Permittee shall complete the necessary repairs prior to continuing production operation of AL-32.

[A.A.C. R18-2-306.A.3.c]

3. Compliance Assurance Monitoring (CAM)

- a. Emission Units Connected to Regenerative Thermal Oxidizer (I02)

(1) Indicators

- (a) The Permittee shall monitor the combustion chamber temperature.

[40 CFR 64.6(c)(1)(i)]

- (b) The Permittee shall monitor the static pressure in the final trunk line inlet duct prior to the oxidizer blower.

[40 CFR 64.6(c)(1)(i)]

(2) Monitoring Approach

[40 CFR 64.3]

- (a) At all times when at any unit is connected to the regenerative thermal oxidizer (I02) and operating, VOC containing materials are not closed, and cleaning operations ceased, the Permittee shall monitor and record the combustion chamber temperature with a temperature thermocouple installed in or immediately downstream of the combustion chamber. The monitoring device shall be validated at a frequency in accordance with the manufacturer's specifications, or other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:

± 0.75% of the temperature being measured expressed in degrees Celsius; or

III. VOC CAPTURE AND CONTROL

± 2.5 degrees Celsius.

- (b) The Permittee shall obtain a temperature reading once every 15 minutes and calculate a rolling 3-hour average.
- (c) At all times when any emission unit, excluding storage tanks, is connected to the regenerative thermal oxidizer (I02), VOC containing materials are not closed, and cleaning operations ceased, the Permittee shall continuously monitor as practicable, and record the static pressure in the final trunk line inlet duct prior to the oxidizer blower. The monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent.
- (d) The Permittee shall obtain a static pressure reading once every 15 minutes and calculate a rolling 3-hour average.

(3) Excursion Determination

[40 CFR 64.6(c)(2)]

- (a) Unless all emission units are properly shutdown, the collection/control system properly shutdown, all VOC containing materials closed/transfers ceased, and cleaning operations ceased, any 3-hour average below the combustion temperature reported in the most recent performance test results approved by ADEQ shall constitute an excursion. Prior to obtaining ADEQ approved results of the first performance test, any 3-hour average temperature below 1500 °F shall constitute an excursion.
- (b) Unless all emission units are properly shutdown, the collection/control system properly shutdown, all VOC containing materials closed/transfers ceased, and cleaning operations ceased, any 3-hour average less negative than the static pressure reported in the most recent performance test results approved by ADEQ shall constitute an excursion. Prior to obtaining ADEQ approved results of the first performance test, any 3-hour average less negative than the static pressure specified by final system design shall constitute an excursion.

D. Testing Requirements

[A.A.C. R18-2-312]

1. Regenerative Thermal Oxidizer (I02)

- a. The Permittee shall obtain from the manufacturer, certifications which validate the regenerative thermal oxidizer (I02) is capable of a minimum VOC destruction efficiency of 97.5%. The Permittee shall provide ADEQ a copy of the manufacturer's certification documents of the regenerative thermal oxidizer (I02).

[A.A.C. R18-306.A.3.c]

- b. The Permittee shall complete performance tests to determine the VOC destruction efficiency of the regenerative thermal oxidizer (I02) in accordance with EPA Reference Method 25A.

[A.A.C. R18-2-312]

- c. The performance testing shall be conducted in the fourth year of the permit term or as requested by ADEQ.

2. Permanent Enclosures

- a. The Permittee shall complete an EPA Method 204 test to verify the 100% capture efficiency of the following:

- (1) The Press Room Permanent enclosure;
- (2) Each material handling area PTE for Press 4; and
- (3) Each material handling area PTE for Laminator/Coater AL-32.

- b. Concurrent with measurement of the pressure drop at each enclosure, the Permittee shall measure and record the static pressure in the final trunk line inlet duct of the corresponding regenerative thermal oxidizer (I02) as well as the operating status of each press and laminator ducted to the corresponding to the regenerative thermal oxidizer (I02). The regenerative thermal oxidizer (I02) duct static pressure and production equipment status shall be included in the test report.

- c. Testing Frequency

- (1) The Permittee shall complete the testing specified in Conditions III.D.2.a and III.D.2.b for each enclosure concurrently with the destruction efficiency test required for the regenerative thermal oxidizer (I02) as specified in Condition III.D.1.
- (2) The Permittee shall complete the testing specified in Conditions III.D.2.a and III.D.2.b for each enclosure at every occurrence of a connection or removal of a press or laminator is made to the inlet header of the regenerative thermal oxidizer (I02).

IV. SOLVENT STILL AND STORAGE TANKS 4 AND 5

The Permittee shall route VOC emissions from the solvent still feed tank and solvent storage tanks (ST-04 and ST-05) to regenerative thermal oxidizer (I02).

V. PARTICULATE MATTER AND OPACITY

A. Fuel Limitations

The Permittee shall only burn pipeline quality natural gas in the following equipment:

[A.A.C. R18-2-306.A.01]

1. The combustion burners of Regenerative Thermal Oxidizer (I02);
2. The dryers of Presses 01 and 04;
3. The dryers of Laminator/Coater AL-32 and Extrusion Laminator EL-31; and
4. Space Heater Units #1 through #9 and Roof Top Units #1 through #12.

B. Emissions Limitations and Standards

1. The Permittee shall not cause, allow or permit the emission of pollutants, caused by combustion of fuel, from the equipment identified in Conditions V.A.1, V.A.2 and V.A.3, into the atmosphere in excess of the amounts greater than the following:

[A.A.C. R18-2-730.A]

a. Particulate Matter

For particulate matter discharged into the atmosphere in any one hour from any unclassified process source in total quantities in excess of the amounts calculated by one of the following equations:

[A.A.C. R18-2-730.A.1]

- (1) For process sources having a process weight rate of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emissions shall be determined by the following equation:

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

where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

P = the process weight rate in tons-mass per hour.

[A.A.C. R18-2-730.A.1.a]

- (2) For process weight rate greater than 60,000 pounds per hour (30 tons per hour), the maximum allowable emissions shall be determined by the following equation:

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

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

V. PARTICULATE MATTER AND OPACITY

P = the process weight rate in tons-mass per hour.

[A.A.C. R18-2-730.A.1.b]

- b. The Permittee shall not cause or permit the emission of sulfur dioxide at rates greater than 600 parts per million.

[A.A.C. R18-2-730.A.2]

- c. The Permittee shall not cause or permit the emission of nitrogen oxides expressed as NO₂ at rates greater than 500 parts per million.

[A.A.C. R18-2-730.A.3]

2. For purposes of this Subsection, the total process weight from all similar units employing a similar type process shall be used in determining the maximum allowable emission of particulate matter.

[A.A.C. R18-2-730.B]

3. Actual values shall be calculated from the applicable equations and rounded off to two decimal places.

[A.A.C. R18-2-730.C]

C. Opacity

1. This Subsection is applicable to the exhaust stacks from the following:

- a. Extrusion Laminator EL-31;
b. Adhesive Laminator/Coater AL-32 (in AOS-1 Operating Mode); and
c. Regenerative Thermal Oxidizer I02

2. The Permittee shall not cause, allow or permit to be emitted into the atmosphere any plume or effluent the opacity of which exceeds 20 percent.

[A.A.C. R18-2-702.B]

D. Monitoring, Recordkeeping, and Reporting Requirements

1. The Permittee shall keep records of fuel supplier certifications, letters from fuel suppliers, or other documentation such as results of laboratory tests containing information regarding the name of the fuel supplier, lower heating value and sulfur content of the fuel. These shall be made available to ADEQ upon request.

[A.A.C. R18-2-306.A.3.c]

2. In accordance with the procedures described in Condition I.A.2 of this Attachment, the Permittee shall monitor emissions from the sources identified in Condition V.C.1 quarterly (once every 3 months).

[A.A.C. R18-2-306.A.3.c]

E. Permit Shield

Compliance with the Conditions of this Subsection part shall be deemed compliance with A.A.C. R18-2-730.A, -B and -C.

VI. FUGITIVE DUST REQUIREMENTS

[A.A.C. R18-2-325]

VI. FUGITIVE DUST REQUIREMENTS

A. Applicability

This Section applies to any non-point source of fugitive dust in the facility.

B. Particulate Matter and Opacity

Open Areas, Roadways & Streets, Storage Piles, and Material Handling

1. Emission Limitations and Standards

- a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40%.

[A.A.C. R18-2-614]

- b. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

- (1) For a building or its appurtenances, or a building or subdivision site, or a driveway, or a parking area, or a vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, keep dust and other types of air contaminants to a minimum by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;

[A.A.C. R18-2-604.A]

- (2) Keep dust to a minimum from vacant lots or an urban or suburban open area where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means;

[A.A.C. R18-2-604.B]

- (3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring, wetting down or by other reasonable means when a roadway or alley is used, repaired, constructed, or reconstructed;

[A.A.C. R18-2-605.A]

- (4) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust. Earth or other material that is deposited by trucking or earth moving equipment shall be

VII. OTHER PERIODIC ACTIVITIES

removed from paved streets by the person responsible for such deposits;

[A.A.C. R18-2-605.B]

- (5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust;

[A.A.C. R18-2-606]

- (6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored;

[A.A.C. R18-2-607.A]

- (7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents;

[A.A.C. R18-2-607.B]

- (8) Any other method as proposed by the Permittee and approved by the Director.

[A.A.C. R18-2-306.A.3.c]

2. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of the dates on which any of the activities listed in Condition VI.B.1.b above were performed and the control measures that were adopted.

[A.A.C. R18-2-306.A.3.c]

b. Opacity Monitoring Requirements

On a quarterly basis, the Permittee shall monitor visible emissions from fugitive sources in accordance with Condition I.A.

[A.A.C. R18-2-306.A.3.c]

C. Permit Shield

Compliance with the Conditions in this Subsection shall be deemed compliance with A.A.C. R18-2-604, -605, -606, -607 and -614.

[A.A.C. R18-2-325]

VII. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations and Standards

VII. OTHER PERIODIC ACTIVITIES

The Permittee shall not cause or allow sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Good modern practices include:

[A.A.C. R18-2-726]

- (1) Wet blasting;
- (2) Effective enclosures with necessary dust collecting equipment; or
- (3) Any other method approved by the Director.

b. Opacity

The Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

2. Monitoring and Recordkeeping Requirements

- a. Each time an abrasive blasting project is conducted, the Permittee shall make a record of the following:

[A.A.C. R18-2-306.A.3.c]

- (1) The date the project was conducted;
- (2) The duration of the project; and
- (3) Type of control measures employed.

- b. Each time an abrasive blasting project is conducted, the Permittee shall monitor visible emissions from the project in accordance with Condition I.A of Attachment "B"

3. Permit Shield

Compliance with Condition VII.A.1 shall be deemed compliance with A.A.C. R18-2-702.B.3 and -726.

[A.A.C. R18-2-325]

B. Use of Paints

1. Volatile Organic Compounds

- a. Emission Limitations and Standards

While performing spray painting operations, the Permittee shall comply with the following requirements:

VII. OTHER PERIODIC ACTIVITIES

- (1) The Permittee shall not conduct or cause to be conducted any spray painting operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.
[A.A.C. R18-2-727.A]
- (2) The Permittee or their designated contractor shall not either:
[A.A.C. R18-2-727.B]
 - (a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or
 - (b) Thin or dilute any architectural coating with a photochemically reactive solvent.
- (3) For the purposes of Condition VII.A.1.a(2), a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in Conditions (a) thru (c) below, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:
[A.A.C. R18-2-727.C]
 - (a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.
[A.A.C. R18-2-727.C.1]
 - (b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.
[A.A.C. R18-2-727.C.2]
 - (c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.
[A.A.C. R18-2-727.C.3]
- (4) Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Condition VII.B.1.a(3), it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.
[A.A.C. R18-2-727.D]

b. Monitoring and Recordkeeping Requirements

[A.A.C. R18-2-306.A.3.c]

VII. OTHER PERIODIC ACTIVITIES

- (1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:
 - (a) The date the project was conducted;
 - (b) The duration of the project;
 - (c) Type of control measures employed;
 - (d) Safety Data Sheets (SDS) for all paints and solvents used in the project; and
 - (e) The amount of paint consumed during the project.

- (2) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition VII.B.1.b(1).

c. Permit Shield

Compliance with Condition VII.B.1.a shall be deemed compliance with A.A.C. R18-2-727.

[A.A.C. R18-2-325]

2. Opacity

a. Emission Limitation and Standard

The Permittee shall not cause, allow or permit visible emissions from painting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

b. Permit Shield

Compliance with Condition VII.B.2.a shall be deemed compliance with A.A.C. R18-2-702.B.3.

[A.A.C. R18-2-325]

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation and Standard

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M National Emissions Standards for Hazardous Air Pollutants - Asbestos.

[A.A.C. R18-2-1101.A.12]

2. Monitoring and Recordkeeping Requirements

The Permittee shall keep all required records in a file. The required records shall include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

VII. OTHER PERIODIC ACTIVITIES

3. Permit Shield

Compliance with Condition VII.C.1 shall be deemed compliance with A.A.C. R18-2-1101.A.12.

[A.A.C. R18-2-325]

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: EQUIPMENT LIST

ATTACHMENT “C”: EQUIPMENT LIST

EQUIPMENT TYPE	MAX. CAPACITY	MAKE/MODEL	SERIAL NUMBER	INSTALLATION/ MFG. DATE	EQUIPMENT ID NUMBER	A.A.C. / NSPS / NESHAP
8-Color Flexo Press/Coater	57” web width, 1,500 fpm.	PCMC/7270	N/A *	1991	Press-01	40 CFR Part 64
10-Color Flexo Press	67” print width, 2,000 fpm	Uteco/170	N/A	2018	Press-04	40 CFR Part 64
Outboard Coating Station (Anti-Fog)	57” print width, 1,200 fpm.	N/A	N/A	2006	OP-03	40 CFR Part 64
Extruder/Laminator	56” web width, 1,200 fpm	Egan/ N/A	N/A	1991	EL-31	40 CFR Part 64
Adhesive Laminator with Coating Deck	68” coat width, 1,470 fpm	Bobst/CL 1000	N/A	2018	AL-32	40 CFR Part 64
Manual Parts Washer	23” × 72” × 45”	N/A / N/A	N/A	1991	PW-01	A.A.C. R18-2-730
Automatic Parts Washer & Still	4’ × 4 × 8’ Chamber	PRI/SWS-308	N/A	2018	PW-03	A.A.C. R18-2-730
Plate Washer	36” width	FlexoWash/PW-92	N/A	2018	PW-04	A.A.C. R18-2-730
Distillation Feed Tank	320 gallons	PRI/DST-300	N/A	2018	DFT-01	A.A.C. R18-2-730
Bulk Solvent Tank No. 1	10,000 gallons, (3 section)	N/A	N/A	1991	ST-01	A.A.C. R18-2-730
Bulk Solvent Tank No. 2	10,000 gallons, (3 section)	N/A	N/A	1991	ST-02	A.A.C. R18-2-730
Bulk Solvent Tank No. 3	10,000 gal, (3 section)	N/A	N/A	1991	ST-03	A.A.C. R18-2-730
Waste Solvent Tank No. 4	6,000 gallons	N/A	N/A	1991	ST-04	A.A.C. R18-2-730
Waste Solvent Tank No. 5	6,000 gallons	N/A	N/A	2018	ST-05	A.A.C. R18-2-730
Regenerative Thermal Oxidizer (I02)	80,000 SFCM	Adwest/ N/A	N/A	2008	I02	40 CFR Part 64

*N/A – Not Available.