Facility Name: **Toppan Interamerica Inc.**
City: McDonough
County: Henry County
AIRS #: 04-13-151-00022

Application #: TV-22711
Date Application Received: July 10, 2014
Permit No: 2754-151-0022-V-04-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Toppan Interamerica Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Toppan Interamerica Inc.

2. Parent/Holding Company Name

Toppan Cosmo, Inc.

3. Previous and/or Other Name(s)

None known.

4. Facility Location

1131 Highway 155 South
McDonough, Georgia 30253 (Henry County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is part of the Atlanta non-attainment area for ozone and PM2.5.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2754-151-0022-V-03-0	1/13/2010	TV permit renewal

D. Process Description

1. SIC Codes(s)

2754

2. Description of Product(s)

Toppan produces decorative papers used for laminating.

3. Overall Facility Process Description

Toppan produces two types of decorative papers used for laminating. The first type of paper is saturating grade, used by high pressure and low pressure melamine laminate producers to make plastic laminates or thermally fused laminates. The second type of paper is a light weight, topcoated grade of paper used mainly to simulate real wood or veneer for furniture and kitchen cabinets. This topcoated grade of paper is laminated by Toppan's customers by gluing the paper directly to a solid substrate such as engineered wood.

Toppan produces decorative paper using five rotogravure printing presses. Two of these presses use steam for drying and the other three have natural gas fired dryers. Steam is produced by three 15 MMBtu/hr boilers. Toppan's gravure printing cylinders are maintained using a chromium stripping and electroplating process.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is a major source under the NSR non-attainment area (NAA) provisions because its permitted/potential VOC emissions exceed 25 tons during any twelve consecutive months. Any future major modifications at this facility will be subject to NAA/NSR permitting which would include LAER requirements.

Potential annual NO_x emissions from this facility exceed 25 tons, but the Permittee requested to establish a facility-wide annual NO_x emission limit of 25 tons to allow the facility to remain a minor NO_x emission source after the reclassification of the Atlanta ozone non-attainment area by US EPA on January 1, 2004. This annual NO_x emission limit is established via Condition 2.1.1.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM_{10}	✓			✓

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
$PM_{2.5}$	✓			✓
SO_2	✓			✓
VOC	✓	✓		
NO_x	✓		✓	
CO	✓			✓
TRS	N/A			
H_2S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		
Total GHGs	✓			✓

3. MACT Standards

- The product rotogravure printing operation at this facility is subject to both 40 CFR Part 63, Subpart KK – *National Emission Standards for the Printing and Publication Industry* promulgated on May 30, 1996, and 40 CFR Part 63, Subpart JJJJ – *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* promulgated on December 4, 2002. Because the existing Part 70 operating permit No. 2754-151-0022-V-01-0 subjected the printing operation to Subpart KK, the operation is no longer subject to Subpart JJJJ as allowed by §63.3300(b) of Subpart JJJJ.

- The hard chromium electroplating operation at this plant is subject to 40 CFR Part 63, Subpart N – *National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*. As a part of residual risk review, the MACT Standard was revised and finalized on September 19, 2012. The revised standard lowered emission limit and added work practice standards.

- As part of a major existing HAP emission source, the three existing boilers (Emission Unit ID Nos. B001, B002 and B003) and any existing indirect process heaters at this facility will be subject to 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters*.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

An annual NO_x emission limit of 25 tons will be established via Condition 2.1.1 of this permit to allow the facility to remain a minor NO_x emission source with the reclassification of the Atlanta ozone non-attainment area by US EPA which occurred on January 1, 2004. This emission limit will also allow the facility to avoid the RACT requirements for major NO_x emission sources located inside the Atlanta ozone non-attainment area under 391-3-1-.02(2)(yy).

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

The renewal application No. 22711 did not indicate the existence of any noncompliance issue or compliance plan.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.1.1 establishes the annual NOx emission limit of 25 tpy for the facility to remain as a minor NOx emission source.

III. Regulated Equipment Requirements

A. Brief Process Description

Toppan produces two types of decorative papers used for laminating. The first type of paper is saturating grade, used by high pressure and low pressure melamine laminate producers to make plastic laminates or thermally fused laminates. The second type of paper is a light weight, top-coated paper used mainly to simulate real wood or veneer for furniture and kitchen cabinets. This top-coated grade of paper is laminated by Toppan's customers by gluing the paper directly to a solid substrate such as engineered wood. Toppan produces both of the decorative papers using five rotogravure printing presses. Two of these presses have steam-heated dryers and the remaining three have natural gas-fired dryers. Steam is produced by three 15 MMBtu/hr boilers. Toppan's gravure printing cylinders are maintained using a hard chromium stripping and electroplating process.

Emissions of concern are volatile organic compounds (VOC) released from inks, coatings, varnishes, adhesives, solvents, primers, reducers, cleanup solutions, and a few other materials used for the printing and coating processes, and chromium (as Cr^{+6} in chromic acid mist) emitted from the hard chromium electroplating process. There is no control of VOC emissions at this facility. The chromic acid emissions are being abated by a composite mesh-pad system. Emissions of other criteria pollutants include particulate matter (PM) from printing/coating processes, and combustion byproducts from fossil fuel combustion units.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
P001	4-color gravure press Saturating grade	40 CFR Part 63, Subpart KK, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(w)	3.2.1, 3.3.9, 3.3.10, 3.4.1, 3.4.2, 3.4.5, 3.5.3, 3.5.4, 4.2.1, 4.2.2, 5.2.3, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.17, 6.2.18, 6.2.19	N/A	N/A
P004	7-color gravure press Light weight paper (coated)				
P005	7-color gravure press Light weight paper (coated)	40 CFR Part 63, Subpart KK, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g), 391-3-1-.02(2)(w)	2.1.1, 3.2.1, 3.3.9, 3.3.10, 3.4.1, 3.4.2, 3.4.5, 3.4.6, 3.5.3, 3.5.4, 4.2.1, 4.2.2, 5.2.3, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.17, 6.2.18, 6.2.19		
P006	5-color gravure press Saturating grade				
P007	4-color gravure press Saturating grade				
RST1	Small, hard chrome plating tank used for chrome plating decorative gravure printing cylinders.	40 CFR Part 63, Subpart N, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.18, 6.2.19	RCS2	Composite mesh-pad filtration system

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
B001	15 MMBtu/hr natural gas boiler with #2 fuel oil as backup fuel. Provides steam for P001, P004, KILN, and space heat.	391-3-1-.02(2)(d), 391-3-1-.02(2)(g) 40 CFR Part 63 Subpart DDDDD	2.1.1, 3.3.12, 3.3.13, 3.3.14, 3.4.3, 3.4.4, 3.4.6, 5.2.4, 6.2.14, 6.2.15, 6.2.16, 6.2.17, 6.2.18, 6.2.19, 6.2.20 through 6.2.24	N/A	N/A
B002	15 MMBtu/hr natural gas boiler with #2 fuel oil as backup fuel. Provides steam for P001, P004, KILN, and space heat.				
B003	15 MMBtu/hr natural gas boiler with #2 fuel oil as backup fuel. Provides steam for P001, P004, KILN, and space heat.	40 CFR Part 60, Subpart Dc 391-3-1-.02(2)(d), 391-3-1-.02(2)(g) 40 CFR Part 63 Subpart DDDDD	2.1.1, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.4.3, 3.4.4, 5.2.4, 6.2.14, 6.2.15, 6.2.16, 6.2.17, 6.2.18, 6.2.19,	N/A	N/A

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

C. Equipment & Rule Applicability

Emission and Operating Caps:

All of the rotogravure presses at this facility have their own annual VOC emission caps/limits as established by "netting" (under NAA/NSR) during previous modifications. The "netting" processes allowed the net potential emission increases of these modifications to remain below the "significant" levels, thus avoiding NAA/NSR review with LAER analysis.

Rules and Regulations Assessment:

- The three existing 15 MMBtu/hr boilers were built after January 1, 1972. The PM and visible emissions from these boilers are subject to the applicable particulate matter (PM) emission limits under Georgia Rule 391-3-1-.02(2)(d)2.(ii) and the visible emission limit under Georgia Rule 391-3-1-.02(2)(d)3. The PM emission rate limit is derived from $E = 0.5(10/R)^{0.50}$ where E equals the allowable PM emission rate in pounds per million Btu heat input and R equals the heat input of each of the boilers in million Btu per hour. In addition, the visible emissions from these boilers shall not have the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity. Fired with natural gas or No. 1 or 2 fuel oil, these boilers emit PM or visible emissions at levels significantly below the Georgia Rule (d) limits.

- Georgia Rule 391-3-1-.02(2)(g)2. limits the sulfur content(s) of the fuel(s) used by the existing boilers at this facility and other fuel combustion units to no more than 2.5% by weight. Since the sulfur contents in commercially available natural gas and propane are well below the Georgia Rule (g) limit, it is not necessary to keep sulfur content records for natural gas or propane. The Permittee will be required to keep fuel sulfur content records when burning fuel oil(s).

- Constructed after June 9, 1989 and having a maximum design heat input capacity of 15 MMBtu/hr, existing boiler B003 is subject to 40 CFR Part 60, Subpart Dc – *Standards of performance for Small Industrial-Commercial-Institutional Steam Generating Units.* The NSPS standards limit the sulfur content of fuel oils used for small steam generating units whose maximum heat input capacities range between 10 and 100 MMBtu/hr to no more than 0.5% by weight. Since the sulfur contents in commercially available natural gas and propane are well below this limit, it is not necessary to keep sulfur content records for natural gas or propane. The Permittee, however, will be required to keep fuel sulfur content records when burning fuel oil(s). Subpart Dc has no PM emission limit for steam generating units which combust natural gas and/or propane with fuel oils.

- Georgia Rules for Air Quality Control 391-3-1-.02(2)(e) – *Particulate Emissions from Manufacturing Processes* applies to all manufacturing processes/units, including direct-heating dryers at this facility, which emit PM. These units are not allowed to emit PM in excess of the rate derived from $E = 4.1P^{0.67}$ where E equals the allowable particulate emission rate in pounds per hour and P equals the process weight input rate in tons per hour. The PM emissions of concern are chromic acid mists exhausted from the hard chromium plating tank. These PM emissions are controlled by a composite mesh-pad filtration system which can eliminate approximately 99.97% of the emissions. As the result, the tank should have no difficulty complying with the PM emission limit. Due to the low levels of the PM emissions from the operations at this facility, other PM emission sources at this facility should have little difficulty complying with the applicable PM emission limits under Georgia Rule (e).

- Georgia Rules for Air Quality Control 391-3-1-.02(2)(b) – *Visible Emissions* applies to manufacturing processes/units which are subject to Rule 391-3-1-.02(2)(e). This rule limits the visible emissions from these sources to less than forty (40) percent opacity. Due to the low levels of the PM emissions from the operations at this facility, all the PM emission sources at this facility should have little difficulty complying with the visible emission limit.

- Because the facility is located in the 13-county Atlanta ozone non-attainment area, and potential VOC emissions from the "paper coating"operation at this facility exceed 15 pounds per day, Georgia Rule 391-3-1-.02(2)(w) – *VOC emissions from paper Coating* applies to each of the presses used for "rotogravure/paper coating" at this facility. Georgia Rule (w) limits the VOC emissions from the paper coating performed by each of the presses to 2.9 lbs VOC per gallon of coating (excluding water and/or exempt compounds). The Permittee can simply comply with this limit when each of the coatings used is a "compliant coating", i.e. the VOC content of the coating does not exceed the limit. However, when any coating delivered to a coating applicator contains more than 2.9 lbs. VOC per gallon, Georgia Rule (w) allows the facility to comply with an equivalent limit of 4.79 lbs. VOC per gallon of coating solids delivered to the coating applicator. Note that Georgia Rule 391-3-1-.02(2)(w) requires the demonstration of compliance with this solids equivalent limit to be based on a 24-hour weighted average of all coatings on a single line or operation, but it does not allow averaging across coating lines. Since there is no VOC control system serving these operations, the company will

comply with the VOC emission limit in Georgia Rule (w) by either using all compliant coatings or meeting the solids equivalent limit.

- With potentials to emit more than 10 tons per year of a single HAP and/or more than 25 tons per year of all HAPs combined, this facility is a major source of HAP emissions under NESHAP/MACT rules. Because they are utilized in a product rotogravure printing process, all of the rotogravure presses at this facility are subject 40 CFR Part 63, Subpart KK – "*Standards of Performance for Hazardous Air Pollutant Emissions From the Printing and Publishing Industry*" as specified in the existing Part 70 operating permit. The Permittee is required to limit HAP emissions from the product rotogravure printing operations at this facility as a whole to no more than one of the following:

  a. Four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or

  b. 20 percent of the mass of solids applied for the month.

- The product rotogravure printing "affected source" subject to this condition includes product rotogravure presses P001, P004, P005, P006, and P007 plus any other equipment which the Permittee chooses to include in accordance with 40 CFR 63.821(a)(3). Since these presses have been subject to Subpart KK via the existing Part 70 permit, they are no longer subject to the requirements under 40 CFR Part 63, Subpart JJJJ - *"National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating"*, as allowed by §63.3300(b) of Subpart JJJJ.

- As part of a major source for HAPs, the existing hard chromium electroplating tank at this facility is subject to 40 CFR Part 63, Subpart N – *National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*. Having a maximum cumulative potential rectifier capacity of less than 60 million amp-hr/yr., the tank has to comply with the NESHAP/MACT standard for the emissions of total chromium from a "small" chromium electroplating tank (i.e., the tank shall not discharge more than 0.015 milligrams of total chromium per dry standard cubic meter in the ventilation/exhaust air stream from the tank). To comply with this emission limit, the Permittee is using the existing composite mesh-pad filtration system to remove the chromic acid mist from the exhaust/ventilation air stream discharged from the tank, and abiding by the work practice standards/requirements specified in the rule. The PM/chromic acid mist emissions are controlled by the composite mesh-pad filtration system, which can eliminate approximately 99.97% of the emissions. According to the MACT standards, tanks equipped with such systems can readily comply with the emission limit if operated properly. In addition, the MACT standards forbid the use of a reducing agent to change the form of chromium from hexavalent to trivalent in the chromium electroplating tank. The performance test was conducted by Clayton Environmental on June 18, 1997 with prior test plan approval from EPD. EPD also conducted its own testing on June 30, 1997 to establish the baseline pressure drop operating specification.

- As part of a major source for HAPs, the three existing boilers (B001, B002 and B003) and any existing indirect-heating process heaters will be subject to 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters*.

D. Compliance Status

The Title V permit application No. 22711 did not indicate the existence of any noncompliance issue or compliance plan.

E. Operational Flexibility

None applicable.

F. Permit Conditions

- Condition 3.2.1 is the annual VOC emission caps/limits in the condition were established via NSR "nettings" performed during previous modifications. These "nettings" allowed the net emission increases from these modifications to remain below the "significant" level under NAA/NSR and the state rules, and thus made those modifications "minor" and avoided NAA/NSR review with LAER requirements, under the same rules. [Avoidance of 40 CFR 51.165]

- Conditions 3.3.1 through 3.3.8 are the 40 CFR Part 63, Subpart N requirements.

- Conditions 3.3.9 and 3.3.10 are the 40 CFR Part 63, Subpart KK requirements.

- Conditions 3.3.11 and 3.3.12 are the 40 CFR Part 60, Subpart Dc requirements.

- Conditions 3.3.13 and 3.3.14 are the 40 CFR Part 63, Subpart DDDDD requirements.

- Condition 3.4.1 is to establish SIP PM emission limits for any process emission units having PM emissions at this facility. This facility will be able to comply with these emission limits with no difficulty, due to the nature of the production at the plant. [391-3-1-.02(2)(e)1]

- Condition 3.4.2 establishes SIP visible emission limits for any process emission units having PM emissions. The facility can comply with the visible emission limit with no difficulty due to the nature of the production. [391-3-1-.02(2)(b)]

- Conditions 3.4.3 and 3.4.4 establish SIP PM and visible emission limits for the three existing 15 mmBTU/hr boilers as well as any indirect-heating fuel burning equipment. Fired with either natural gas or distillate fuel oil, these sources can readily comply with the emission limits. [391-3-1-.02(2)(d)]

- Condition 3.4.5 is permit requirements for the presses and also is specific about the emission standard and rule applicability for Rule 391-3-1-.02(2)(w).

- Condition 3.4.6 allows the use of only natural gas, propane and distillate fuel oil at this facility. The Permittee requested this limitation mainly to minimize NO_x emissions to ensure the facility remains a minor NO_x emission source under both state and federal rules. [391-3-1-.02(2)(g)]

- Condition 3.5.1 is to establish stack exiting requirements that were utilized in the ambient impact assessment of toxic pollutant emissions performed for the modifications permitted by the amendment. [391-3-1-.02(a)3.(ii)]

- Condition 3.5.2 is to ensure the proper use and maintenance of the emission control system and to minimize its downtime or malfunction. [391-3-1-.02(2)(a)10.]

- Conditions 3.5.3 and 3.5.4 are to ensure good work practices which will, in turn, reduce VOC emissions resulting from excessive or unnecessary evaporation from VOC-laden cleaning materials and/or solvents. [391-3-1-.02(2)(a)10.]

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Conditions 4.2.1 and 4.2.2 are the testing requirements for the determinations of organic HAP, volatile matter and solids content of the product rotogravure printing/coating materials to the applicable procedural requirements in 40 CFR Part 63, Subpart KK. Only the results obtained following the testing requirements in these conditions can be used to demonstrate compliance with the HAP emission standards/limits in Subpart KK which are required in Part 6.0 of this permit. [40 CFR 63.827(b)(2) and 63.827(c)]

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

- Condition 5.2.1 is the monitoring requirements for 40 CFR Part 63, Subpart N.
- Condition 5.2.2 establishes detailed monitoring requirements applicable to the control system serving the hard chromium electroplating tack, as specified in 40 CFR Part 63, Subpart N.
- Condition 5.2.3 is to ensure compliance with the work practice requirements for reducing VOC emissions from uncontrolled and/or unnecessary evaporation as specified in Conditions 3.5.3 and 3.5.4.
- Conditions 5.2.4 and 5.2.5 are the monitoring requirements for 40 CFR Part 63, Subpart DDDDD.

C. Compliance Assurance Monitoring (CAM)

The CAM Requirements are not applicable for this facility since all the PTEs for each emission unit are less than 100 tpy.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a [quarterly or semiannual] basis.

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

B. Specific Record Keeping and Reporting Requirements

- Conditions 6.2.1 through 6.2.5 are detailed record keeping requirements for presses' VOC emissions.
- Conditions 6.2.6 through 6.2.8 are detailed record keeping requirements for 40 CFR Part 63, Subpart KK.
- Condition 6.2.9 requires compliance demonstrations for Condition 3.5.1.
- Conditions 6.2.10 through 6.2.13 are detailed record keeping and reporting requirements for 40 CFR Part 63, Subpart N.
- Conditions 6.2.14 through 6.2.18 establish record keeping, compliance demonstration, and reporting requirements for compliance with the facility-wide annual NO_x emission limit in Condition 2.1.1. [Avoidance of 40 CFR 51.165 – NSR/NAA and 391-3-1-.02(2)(yy), 40 CFR Part 60, Subpart Dc]
- Condition 6.2.19 indicates that the facility is subject to an annual actual emissions reporting requirement for VOC and NO_x emissions under Rule 391-3-1-.02(6)(a)4 when required by the Division.
- Conditions 6.2.20 through 6.2.24 are detailed record keeping requirements for 40 CFR Part 63, Subpart DDDDD.

VII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

Refer to http://airpermit.dnr.state.ga.us/GATV/default.asp for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

No changes

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.