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

Application #: TV- 441215
Date Application Received: December 10, 2019
Permit No: 2754-151-0022-V-05-0

Program	Review Engineers	Review Managers
SSPP	Ginger Payment	Jeng-Hon Su
ISMU	Anna Gray	Dan McCain
SSCP	Michael Susky	Tammy Martiny
Toxics	N/A	N/A
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced 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. The 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 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 located in the Atlanta non-attainment area, which is classified as “marginal” for ozone.

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
Permit No. 2754-151-0022-V-04-0	June 12, 2015	Title V Renewal
Amendment No. 2754-151-0022-V-04-1	September 24, 2020	Construction and operation of a new chrome electroplating tank (Tank RST2).

D. Process Description

1. SIC Codes(s)

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The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Toppan Interamerica Inc. (hereinafter “facility”) produces decorative papers used for laminating.

3. Overall Facility Process Description

Toppan Interamerica Inc. 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 customers by gluing the paper directly to a solid substrate such as engineered wood.

Toppan Interamerica Inc. 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. The 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

Toppan Interamerica Inc. is located in Henry County, which has a major source threshold of 100 tpy for nitrogen oxides (NOx) and volatile organic compounds (VOC). The facility’s potential-to-emit (PTE) for volatile organic compounds (VOC) was greater than 100 tpy; therefore, the facility is a major source for VOC. Because the NOx emissions are limited to 25 tpy with Condition 2.1.1, the facility is minor under NAA NSR for NOx.

The facility is not one of the 28 named source categories of the Prevention of Significant Deterioration (PSD) regulations. PTE for each of the criteria pollutants other than NOx and VOC is lower than the associated PSD major source threshold; therefore, the facility is minor under PSD regulations.

Since the facility's VOC PTE is greater than 25 tpy, it is potentially subject to the Reasonably Available Control Technology (RACT) requirements specified in GA Rule (tt). According to Georgia Rules for Air Quality Control 391-3-1-.02(tt)5., the applicable emissions of VOC from any source shall exclude all VOC emissions subject to any other more specific VOC requirements contained in other subsections of this Rule. Since the majority of VOC emissions are from Presses P001/P004/P005/P006/P007, and these presses are all subject to GA Rule (w), "VOC Emissions from Paper Coating," GA Rule (tt) and the associated VOC RACT requirements are not applicable to the facility.

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}	✓			✓
$PM_{2.5}$	✓			✓
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 63, Subpart KK – *National Emission Standards for the Printing and Publication Industry* promulgated on May 30, 1996, and 40 CFR 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 40 CFR 63.3300(b) of Subpart JJJJ.

- The hard chromium electroplating operation at this plant is subject to 40 CFR 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 are subject to 40 CFR 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:

Condition 2.1.1 allows the facility to avoid the RACT requirements for major NO_x emission sources as stated by Georgia Rule 391-3-1-.02(2)(yy).

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance related issues noted with this application.

D. Permit Conditions

Condition 2.1.1 establishes the annual NOx emission limit of 25 tpy for the facility to primarily avoid triggering the NOx RACT requirements specified in Georgia Rule (yy). It also caps the facility-wide NOx emissions below 100 tpy to keep the facility a minor source of NOx emissions.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
P001	4-color gravure press Saturating grade	40 CFR 63 Subpart A 40 CFR 63 Subpart KK 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(w)	N/A	N/A
P004	7-color gravure press Light weight paper (coated)	40 CFR 63 Subpart A 40 CFR 63 Subpart KK 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(w)	N/A	N/A
P005	7-color gravure press Light weight paper (coated)	40 CFR 63 Subpart A 40 CFR 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)	N/A	N/A
P006	5-color gravure press Saturating grade	40 CFR 63 Subpart A 40 CFR 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)	N/A	N/A
P007	4-color gravure press Saturating grade	40 CFR 63 Subpart A 40 CFR 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) 40 CFR 63 Subpart KK	N/A	N/A
RST1	Small, hard chrome plating tank used for chrome plating decorative gravure printing cylinders.	40 CFR 63 Subpart A 40 CFR 63 Subpart N 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	RCS2	Composite mesh-pad filtration system
RST2	Chromium Electroplating Tank (Used for chrome plating decorative gravure printing cylinders)	40 CFR 63 Subpart A 40 CFR 63 Subpart N 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	RCS3	Composite Mesh Pad Mist Eliminator
B001	15 MMBtu/hr natural gas boiler with #2 fuel oil as backup fuel. Provides steam for P001, P004, KILN, and space heat.	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	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.	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	N/A	N/A
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 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	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 are intended as a compliance tool and may not be definitive.

B. 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 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. Because the boilers fire natural gas or No. 1 or 2 fuel oil, the boilers will comply with Georgia Rule (d).

- 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).

- Because the three existing 15 MMBtu/hr boilers were built prior to May 1, 1999, they are <u>not</u> subject to Georgia Rule 391-3-1-.02(2)(lll) – *NOx Emissions from Fuel-Burning Equipment*.

- Because the NOx emissions are limited to less than 25 tpy, the facility will <u>not</u> be subject to Georgia Rule 391-3-1-.02(2)(yy) – *Emissions of Nitrogen Oxides from Major Sources*.

- 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.

- Because the facility is a major source of HAP emissions, 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. Per Item 1. and Item 3. of Table

3 to 40 CFR 63 Subpart DDDDD, depending on whether the boilers are equipped with oxygen trim systems, they are subject to either the annual or 5-yr tune-up requirements.

- Georgia Rule (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 Rule (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.

- Because potential HAP emissions exceed 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. 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 hard chromium electroplating tanks at this facility are 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 tanks have 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 tanks 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.

C. Permit Conditions

As discussed in Permit Amendment No. 2754-151-0022-V-04-1, the existing hard chrome plating tank (ID No. RST1) will be replaced with new chromium electroplating tank (ID No. RST2). Condition 3.3.15 will void all requirements for Chrome Plating Tank RST1 specified in Conditions 3.3.1 through 3.3.8, 5.2.1, 5.2.2, 6.1.7b.xi, 6.1.7c.ii., 6.1.7d.ix. and d.x., and 6.2.10 through 6.2.13 when the Permittee permanently shuts down RST1. However, the tank replacement was not completed at the time of this permit renewal and conditions for both tanks are included in the permit.

- 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.

- Conditions 3.3.1 through 3.3.8 detail the requirements for 40 CFR Part 63, Subpart N for Chrome Plating Tank RST1.

- Conditions 3.3.9 through 3.3.11 detail the requirements for 40 CFR Part 63, Subpart KK.
- Conditions 3.3.12 and 3.3.13 detail the requirements for 40 CFR Part 60, Subpart Dc.
- Conditions 3.3.14 and 3.3.15 detail the requirements for 40 CFR Part 63, Subpart DDDDD.
- Condition 3.3.16 will void all requirements for RST1 upon permanent shutdown of this tank.
- Conditions 3.3.17 subjects the new chromium electroplating tank RST2 to 40 CFR Part 63, Subpart N.
- Condition 3.3.18 contains the chromium emission standard for chromium electroplating tank RST2. Note that this limit was much lower than the 40 CFR 63 Subpart N chromium emission limit because of Georgia Air Toxics Guideline. Chromium has a very low annual AAC, and therefore, the facility is subject to a very low chromium emission limit in order to comply with Georgia Air Toxics Guideline.
- Condition 3.3.19 through 3.3.24 detail the requirements for 40 CFR 63 Subpart N.
- Condition 3.4.1 subjects the processing equipment to Georgia Rule (e).
- Condition 3.4.2 subjects the process emissions units to Georgia Rule (b).
- Condition 3.4.3 subjects the boilers and any indirect-heating fuel burning equipment to Georgia Rule (d).
- Condition 3.4.4 subjects the paper coating operations to Georgia Rule (w).
- Condition 3.4.5 subjects the fuel burning sources to Georgia Rule (g) and limits the sulfur in the fuel.
- Condition 3.5.1 establishes stack exiting requirements that were utilized in the ambient impact assessment of toxic pollutant emissions performed for the modifications permitted by the amendment.
- Condition 3.5.2 is to ensure the proper use and maintenance of the emission control system and to minimize its downtime or malfunction.
- 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.

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.

- Condition 4.2.3 requires that the facility conduct an initial performance test to demonstrate compliance with the chromium emission limit specified in Condition 3.3.17.

- Condition 4.2.4 requires the facility to establish a site-specific pressure drop range across the composite mesh pad mist eliminator (ID No. RCS3) during the performance testing.

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.
- Condition 5.2.4 contains the work practice standards for 40 CFR Part 63, Subpart DDDDD.
- Condition 5.2.5 contains the operation and maintenance practices for the composite mesh pad mist eliminator (ID No. RCS3) that controls the new chromium electroplating tank (ID No. RST2), per 40 CFR 63.342(f)(3)(B) and Table 1 to 40 CFR 63 Subpart N.
- Condition 5.2.6 requires that the facility install, calibrate, maintain, and operate a differential pressure indicator on the composite mesh pad mist eliminator (ID No. RCS3) to measure and record the pressure drop across ID No. RCS3 once each day that it is operating. This is required by 40 CFR 63.343(c)(1)(ii).

C. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring (CAM) is not applicable because all the pre-controlled emissions 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 semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Most requirements for Condition 6.1.7 had been established in Permit No. 2754-151-0022-V-05-0 and Permit Amendment No. 2754-151-0022-V-05-1. The following conditions of Condition 6.1.7 were added in this permit renewal:

- Condition 6.1.7d.x is a new condition which requires ongoing compliance status report for chromium electroplating tank RST2.

Conditions 6.2.1 through 6.2.5 detail the record keeping requirements for VOC emissions from the presses.

Conditions 6.2.6 through 6.2.8 detail the 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 detail the 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.

Condition 6.2.19 subjects the facility 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 6.2.23 detail the record keeping requirements for 40 CFR Part 63, Subpart DDDDD.

Condition 6.2.24 contains the record keeping and reporting requirements specified in 40 CFR 63.342(f)(3)(iv).

Condition 6.2.25 contains the record keeping and reporting requirements of the actual cumulative rectifier capacity of RST2 that are specified in 40 CFR 63.342(c)(3)(i)(A) and 63.346(b)(12).

Condition 6.2.26 contains the record keeping requirements specified in 40 CFR 63.346(b)(1) through (11) and (16).

Condition 6.2.27 contains the Notification of Compliance Status requirement specified in 40 CFR 63.347(e)(1) and (3).

Condition 6.2.28 contains the semiannual reporting requirements specified in 40 CFR 63.347(g)(1) and (3).

Condition 6.2.29 requires that the facility notify the Division when the hard chrome plating tank (ID No. RST1) is permanently shut down and when the chromium electroplating tank (ID No. RST2) initially starts up.

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

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.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//