



# Temporary Permit

**Permit No:** TP-0317  
**Date Issued:** July 12, 2023

This certifies that:

**Warwick Mills, Inc.**  
**301 Turnpike Road**  
**New Ipswich, NH 03071**

has been granted a Temporary Permit for:

**Fabric and Metal Coil Coating Processes, and One Boiler**

at the following facility and location:

**Warwick Mills, Inc.**  
**301 Turnpike Road**  
**New Ipswich, NH**

**Facility ID No:** 3301100129  
**Application No:** 22-0090, received May 23, 2022 – Temporary Permit

which includes devices that emit air pollutants into the ambient air as set forth in the permit application referenced above, which was filed with the New Hampshire Department of Environmental Services, Air Resources Division (department) in accordance with RSA 125-C of the New Hampshire Laws. Request for permit renewal must be received by the department at least 90 days prior to expiration of this permit and must be accompanied by the appropriate permit application forms.

This permit is valid upon issuance and expires on **January 31, 2025**.

*Craig Wright*  
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Director  
Air Resources Division

**Abbreviations and Acronyms**

AAL	Ambient Air Limit
acf	actual cubic foot
ags	above ground surface
ASTM	American Society of Testing and Materials
Btu	British thermal units
CAS	Chemical Abstracts Service
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DER	Discrete Emission Reduction
Env-A	New Hampshire Code of Administrative Rules – Air Related Programs
ERC	Emission Reduction Credit
ft	foot or feet
ft <sup>3</sup>	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hp	horsepower
hr	hour
kW	kilowatt
lb	pound
LPG	Liquefied Petroleum Gas
MM	million
MW	megawatt
NAAQS	National Ambient Air Quality Standard
NG	Natural Gas
NHDES	New Hampshire Department of Environmental Services (department)
NO <sub>x</sub>	Oxides of Nitrogen
NSPS	New Source Performance Standard
PM <sub>10</sub>	Particulate Matter < 10 microns
ppm	parts per million
psi	pounds per square inch
RACT	Reasonably Available Control Technology
RSA	Revised Statutes Annotated
RTAP	Regulated Toxic Air Pollutant
scf	standard cubic foot
SDS	Safety Data Sheet
SO <sub>2</sub>	Sulfur Dioxide
TSP	Total Suspended Particulate
tpy	tons per consecutive 12-month period
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

**I. Facility Description**

Warwick Mills, Inc. (the Facility) manufactures protective and technical textiles and operates two boilers for building heat, process steam and to control Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAPs, as defined in the 1990 Clean Air Act Amendments) and Regulated Toxic Air Pollutant (RTAPs) emissions from several solvent-based process operations. The manufacturing processes at the Facility include the application of solvent-based solids to various substrates including woven fabrics, metal coil and other substrates. The Facility has the potential to emit VOCs above the major source threshold of 50 tpy and HAPs above the major source threshold of 10 tpy of any individual HAP and 25 tpy for all HAPs combined. Limitations on the potential to emit for these pollutants are included in this Temporary Permit and establishes this facility as a synthetic minor source of VOCs and HAPs.

**II. Emission Unit Identification**

This permit covers the process devices identified in Table 1A:

Table 1A - Emission Unit Identification			
Emission Unit ID	Process Identification	Installation Date	Maximum Design Capacity
EU01	Coater 1	March 2005	Max web width: 65 inches Max feed rate: 15 yards per minute <sup>1</sup>
EU02	Coater 2	March 2005	Max web width: 65 inches Max feed rate: 7 yards per minute <sup>1</sup>
EU05	Assembly Machine 1	2007	Minor Core Activities <sup>2</sup> – VOC emissions less than 5 tpy for all minor core activities located at the Facility
EU06	Assembly Machine 2	2007	
EU11	Portable Downdraft Table 1	NA	
EU12	Portable Downdraft Table 2	NA	

This permit covers the fuel burning device identified in Table 1B:

Table 1B - Emission Unit Identification				
Emission Unit ID	Device Identification	Manufacturer Model	Installation Date	Maximum Design Capacity and Permitted Fuel Type(s) <sup>3</sup>
EU13	Biomass gasification unit	Dall Energy 2 MW Biomass	2012	8.02 MMBtu/hr Biomass equivalent to 1,666 lb/hr

**III. Pollution Control Equipment Identification**

At least one of the air pollution control devices listed in Table 2 shall be operated when any of the associated devices are operating in order to meet permit conditions.

<sup>1</sup> Although the coaters EU01 and EU02 have the capacity to feed 15 and 7 yards of web per minute respectively, the rate at which continuous web coating occurs is dependent on the concentration of the VOC/HAP emission from the associated curing ovens. Due to life/safety concerns, the processes are only operated at 20-45% of the LEL of the VOC laden fumes leaving the ovens.

<sup>2</sup> "Minor core activity" as defined in Env-A 1203.38 meaning any core activity at a stationary source for which the VOC emission from all processes and devices associated with the minor core activity are less than both the relevant RACT applicability emissions threshold, and a total of 5 tons per consecutive 12-month period.

<sup>3</sup> The hourly fuel rate is set assuming a heating value of 4,813 Btu/lb for biomass and 91,500 Btu/gallon for propane (LPG).

Table 2 - Pollution Control Equipment Identification			
Pollution Control Equipment ID	Description	Purpose	Emission Units Controlled
PCE01	Cleaver Brooks boiler 2.1 MMBtu/hr equivalent to 23 gal/hr LPG <sup>3</sup> Model: CB-621-80 S/N: 0-15671	Control of VOCs, HAPs and RTAPs	EU01, EU02
PCE02	EU13	Control of VOCs, HAPs and RTAPs	EU01, EU02

**IV. Stack Criteria**

Any device or process using the de minimis emission level method or adjusted in-stack concentration method to demonstrate compliance with Env-A 1400, *Regulated Toxic Air Pollutants* shall have an exhaust stack that discharges vertically, without obstruction<sup>4</sup>.

**V. Operating and Emission Limitations**

The owner or operator shall be subject to the operating and emission limitations identified in Table 3:

Table 3 - Operating and Emission Limitations			
Item #	Requirement	Applicable Emission Unit	Regulatory Basis
1.	<b>Facility-Wide Emission Limitations<sup>5</sup></b> a. Facility-wide emissions of VOCs shall be limited to less than 49.9 tpy; and b. Facility-wide emissions of HAPs shall be limited to less than 10 tpy for any individual HAP and 25 tpy for all HAPs combined.	Facility Wide	Env-A 604.02(a)(1)
2.	<b>24-hour and Annual Ambient Air Limit</b> The emissions of any Regulated Toxic Air Pollutant (RTAP) shall not cause an exceedance of its associated 24-hour or annual Ambient Air Limit (AAL) as set forth in Env-A 1450.01, <i>Table of All Regulated Toxic Air Pollutants</i> .	Facility Wide	Env-A 1400 State-only Enforceable Limit
3.	<b>Revisions of the List of RTAPs</b> In accordance with RSA 125-I:5 IV, if the department revises the list of RTAPs or their respective AALs or classifications under RSA 125-I:4, II and III, and as a result of such revision the owner or operator is required to obtain or modify the permit under the provisions of RSA 125-I or RSA 125-C, the owner or operator shall have 90 days following publication of notice of such final revision in the New Hampshire Rulemaking Register to file a complete application for such permit or permit modification.	Facility Wide	Env-A 1404.02 State-only Enforceable Limit
4.	<b>RTAP Operating Limitations</b> Emissions of RTAPs from process operations shall be controlled using PCE01 or EU13/PCE02 to maintain compliance with the associated 24-hour and annual AALs as set forth in Env-A 1450.01, <i>Table of All Regulated Toxic Air Pollutants</i> .	EU01, EU02, EU05, EU06, EU11, EU12	Env-A 1400 State-only Enforceable Limit

<sup>4</sup> There is no impediment to vertical flow and the exhaust stack extends at least 2 feet higher than any roofline within 10 feet of the exhaust stack exit, measured horizontally.

<sup>5</sup> The Facility has the potential to emit VOCs and HAPs at levels greater than the major source thresholds for these pollutants of 50 tpy for VOCs, and 10 tpy for any individual HAP and 25 tpy of all HAPs combined. The annual emission limits in Table 3, Item 1 are less than these thresholds and establish the Facility as a synthetic minor source of air pollution for VOCs and HAPs. The Facility does not have the potential to emit the criteria pollutants NOx, SO<sub>2</sub>, CO and PM<sub>10</sub> at levels greater than the major source thresholds and is therefore a true minor source for NOx, SO<sub>2</sub>, CO, and PM<sub>10</sub>.

Table 3 - Operating and Emission Limitations			
Item #	Requirement	Applicable Emission Unit	Regulatory Basis
5.	<b>Visible Emission Standard for Fuel Burning Devices Installed After May 13, 1970</b> The average opacity from fuel burning devices installed after May 13, 1970, shall not exceed 20 percent for any continuous 6-minute period. <sup>6</sup>	EU13	Env-A 2002.02
6.	<b>Particulate Emission Standards for Fuel Burning Devices Installed on or After January 1, 1985</b> The particulate matter emissions from fuel burning devices installed on or after January 1, 1985 shall not exceed 0.30 lb/MMBtu.	EU13	Env-A 2003.03
7.	<b>Compliance Option for Miscellaneous and Multicategory Stationary VOC Sources</b> The owner or operator shall install and operate capture and control systems that result in a reduction in the actual uncontrolled VOC emission rate to the atmosphere, calculated as a 24-hour calendar day average of at least 81%, as determined by dividing the difference between the uncontrolled VOC emissions from all non-exempt processes and the VOC emissions after controls from all non-exempt processes by the uncontrolled VOC emissions from all non-exempt processes.	EU01, EU02	Env-A 1222.02(a)(1)
8.	<b>NSPS – Metal Coil Surface Coating</b> The owner or operator shall not cause to be discharged into the atmosphere more than: a. 0.14 kg VOC/l of coating solids applied for each calendar month that continuously uses an emission control device operated at the most recently demonstrated overall efficiency; or b. 10 percent of the VOC’s applied for each calendar month (90 percent emission reduction) that continuously uses an emission control device operated at the most recently demonstrated overall efficiency.	EU02	40 CFR 60.462 Subpart TT
9.	<b>Pollution Control Equipment Operation and Maintenance</b> Control device operation and maintenance shall be done in accordance with the Air Pollution Control Equipment Monitoring Plan submitted with Application 22-0090, updated in accordance with Table 6, Item 4, and include the following: a. The flow rate at the coating oven exhaust of EU01 and/or EU02 leading to PCE01 or PCE02 shall be maintained at or above 0.01 inches of water column, which is equivalent to 200 feet per minute, to assure 100% capture of VOC/HAP from the coating enclosures and ovens. b. When in operation, the exhaust from EU05, EU06, EU11 and EU12 shall be vented to PCE01 or PCE02.	PCE01, PCE02	Env-A 810, Env-A 1403.01 State-only Enforceable Limit
	c. During coating operations, the average combustion temperature in any one-hour block average shall not fall more than 50°F below the temperature determined during the most recent stack test required in Table 4, Item 6 as measured by the following: 1. For PCE02: i. The highest of the two combustion unit top thermocouples; or ii. The one above-door thermocouple; and		Env-A 810

<sup>6</sup> Compliance with visible emission limitations shall be determined, upon request by the department, using 40 CFR 60, Appendix A, Method 9, or other department approved method.

Table 3 - Operating and Emission Limitations			
Item #	Requirement	Applicable Emission Unit	Regulatory Basis
	2. For PCE01: i. The system thermocouple at the exit of the second bypass.		
	d. During metal coil coating operations, the average combustion temperature in any 3-hour period shall not fall more than 50°F below the temperature determined during the most recent stack test required in Table 4, Item 6 as measured by the following: 1. For PCE02: i. The highest of the two combustion unit top thermocouples; or ii. The one above-door thermocouple; and 2. For PCE01: i. The system thermocouple at the exit of the second bypass.	EU02, PCE01, PCE02	40 CFR 60.464(c) Subpart TT
10.	<b>NESHAP for Area Sources: General Provisions</b> a. At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. b. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by this standard have been achieved; and c. Determination of whether such operation and maintenance procedures are being used will be based on information available to the department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	EU13	40 CFR 63.11205 Subpart JJJJJ

**VI. Monitoring and Testing Requirements**

The owner or operator is subject to the monitoring and testing requirements as contained in Table 4:

Table 4 – Monitoring and Testing Requirements				
Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
1.	When conditions warrant, the department may require the owner or operator to conduct stack testing in accordance with USEPA or other department approved methods.	Upon request by the department	Facility Wide	RSA 125-C:6, XI
2.	<b>NSPS - Polymeric Coating of Supporting Substrates</b> The owner or operator shall make semiannual estimates of the projected annual amount of VOC to be used for the coating of polymeric substrate in that year.	Semiannually	EU01, EU02	40 CFR 60.744(b) Subpart VVV
3.	<b>NESHAP for Area Sources: Industrial, Commercial and Institutional Boilers – Boiler Tune-up Requirement</b> The owner or operator shall conduct a performance tune-up of the boiler to demonstrate continuous compliance. The tune-up must be conducted while burning the type of fuel or fuels that provided the majority of the heat input to the boiler over the 12-months prior to the tune-up. The tune-up shall consist of the following: a. As applicable, inspect the burner, and clean or replace	Biennially	EU13	40 CFR 63.11223 Subpart JJJJJ

**Table 4 – Monitoring and Testing Requirements**

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	any components of the burner as necessary, <sup>7</sup> b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if applicable; c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. <sup>7</sup> d. Optimize total emissions of CO. This optimization shall be consistent with the manufacturer’s specifications, if available, and with any NOx requirement to which the unit is subject; and e. Measure the concentrations in the effluent steam of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made. <sup>8</sup>			
4.	<p><b>Combustion Temperature</b></p> a. Monitor and record the temperature in the combustion chamber.	Monitor continuously when the associated process is operating	EU01, EU02, PCE01, PCE02	RSA 125-C:6, XI, Env-A 906, Env-A 911.03(b), 40 CFR 60.464(c) Subpart TT
b. If the average temperature reading is more than 50°F below than the minimum specified in Table 3, Item 9.(c.), then inspect the unit and take corrective action to raise the temperature. c. If the temperature cannot be brought back up within 48 hours of the excursion <sup>9</sup> , then maintain records of the excursion pursuant to Table 5, Item 12.	As noted	RSA 125-C:6, XI, Env-A 906, Env-A 911.03(b),		
d. If the temperature cannot be brought back up within 3 hours of the excursion <sup>9</sup> , then maintain records of the excursion pursuant to Table 5, Item 12.		40 CFR 60.464(c) Subpart TT		
5.	<p><b>Pollution Control Device Inspection</b></p> Conduct a visual external integrity inspection of the pollution control equipment. a. The inspection shall include an evaluation of whether all emissions are being vented through the dedicated stack exit; and b. The inspection shall be conducted by plant personnel familiar with the operation of the boiler and associated equipment.	If conditions indicate that the system may need maintenance, but at least annually	PCE01, PCE02	RSA 125-C:6, XI

<sup>7</sup> The burner inspection and/or the inspection of the system controlling the air-to-fuel ration may be delayed until the next scheduled unit shutdown, not to exceed 36 months for biennial tune-ups, from the previous inspection.

<sup>8</sup> Measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made. Measurements may be taken using a portable CO analyzer.

<sup>9</sup> An excursion occurs when a monitored parameter specified by the permit to document the performance of the air pollution control equipment is above the maximum or below the minimum set point or is outside of the required operating range for that parameter.

Table 4 – Monitoring and Testing Requirements				
Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
6.	<p><b>VOC/RTAP Control Efficiency Testing</b></p> <p>a. Conduct emissions testing to evaluate compliance with the control efficiency requirement in Table 3, Item 7 and Item 8.</p> <p>b. Testing shall be conducted in accordance with Table 4, Items 7 and 8; and</p> <p>c. Compliance testing shall be planned and carried out in accordance with the following schedule:</p> <ol style="list-style-type: none"> <li>1. A pre-test protocol shall be submitted to the department at least 30 days prior to the commencement of testing.</li> <li>2. The owner or operator and any contractor retained by the owner or operator to conduct the test shall meet with a department representative at least 15 days prior to the test date to finalize the details of the testing; and</li> <li>3. A test report shall be submitted to the department within 60 days after the completion of testing.</li> </ol>	<p>Every 5 years<sup>10</sup> within the same calendar quarter of the date of the anniversary of the most recent compliance test.</p> <p>PCE01 initial testing within 180 days of permit issuance, or within 60 days of startup for PCE01 as a control device whichever is later.</p>	PCE01, PCE02	Env-A 804.13, Env-A 804.12
7.	<p><b>Operating Conditions During a Stack Test</b></p> <p>Compliance testing shall be conducted under one of the following operating conditions:</p> <ol style="list-style-type: none"> <li>a. Between 90 and 100%, inclusive, of maximum production rate or rated capacity.</li> <li>b. A production rate at which maximum emissions occur or at such operating conditions agreed upon during a pre-test meeting conducted pursuant to Item 6.(c).(2.); and</li> <li>c. Testing shall be performed at the inlet and outlet of PCE01 and EU13/PCE02 to determine destruction efficiency for each pollution control device.</li> </ol>	For each required stack test per Table 4, Item 6	PCE01, PCE02	Env-A 802.10
8.	<p><b>VOC Capture and Control Efficiency</b></p> <p>The following test methods, or department approved alternatives, shall be used, as applicable:</p> <ol style="list-style-type: none"> <li>a. Collect combustion zone temperature readings as agreed upon in the pre-test protocol required in Item 6.(c).(1).</li> <li>b. Collect process information as agreed upon in the pre-test protocol required in Item 6.(c).(2), above.</li> <li>c. USEPA Methods 1-4 for exit flow rate, percentage of carbon dioxide, oxygen and moisture.</li> <li>d. USEPA Method 25 or 25A for total gaseous organic emissions;</li> <li>e. USEPA Method 9 for visible emissions for EU13/PCE02; and</li> <li>f. USEPA Method 204 to determine Permanent Total Enclosure of the EU01 and EU02.</li> </ol>	For each required stack test per Table 4, Item 6	EU01, EU02, PCE01, EU13/PCE02	Env-A 802

<sup>10</sup> The most recent stack test for PCE02 [EU13] was performed on January 21 and 22, 2020; therefore, the next compliance test is due in the first quarter of 2025. The most recent stack test for PCE01 was performed June 8, 2010. Testing will be required within 60 days of startup of the boiler for use as a control device or within 180 days of issuance of this Permit whichever is later.



**VII. Recordkeeping Requirements**

The owner or operator shall be subject to the recordkeeping requirements identified in Table 5:

<b>Table 5 - Recordkeeping Requirements</b>				
<b>Item #</b>	<b>Requirement</b>	<b>Duration/ Frequency</b>	<b>Applicable Unit</b>	<b>Regulatory Basis</b>
1.	<b>Record Retention and Availability</b> Keep the required records on file. These records shall be available for review by the department upon request.	Retain for a minimum of 5 years	Facility Wide	Env-A 902.01
2.	<b>Regulated Toxic Air Pollutants</b> Maintain records documenting compliance with Env-A 1400. Compliance was demonstrated at the time of permit issuance as described in the department’s Application Review Summary for application # 22-0090. The source must update the compliance demonstration using one of the methods provided in Env-A 1405 if: a. There is a revision to the list of RTAPs lowering the AAL or de minimis value for any RTAP emitted from the Facility. b. The amount of any RTAP emitted is greater than the amount that was evaluated in the Application Review Summary (e.g., use of a coating will increase). c. An RTAP that was not evaluated in the Application Review Summary will be emitted (e.g., a new coating will be used); or d. Stack conditions (e.g. air flow rate) change.	Update prior to process changes and within 90 days of each revision of Env-A 1400	Facility Wide	Env-A 902.01 State-only Requirement
3.	<b>Additional Recordkeeping Requirements: Emission Limitations</b> To demonstrate that the total emissions of HAPs and VOCs are below the emission limitations in Table 3, Item 1 for these pollutants: a. Maintain a 12-month running total of Facility-wide emissions, calculated pursuant to Env-A 705.03; and	Monthly	Facility Wide	Env-A 906, Env-A 604.02(a)(3)
	b. Maintain a list of all devices which emit VOCs and HAPs which are included in the Facility wide emissions limitations listed in Table 3, Item 1.	Annually		
4.	<b>General Recordkeeping Requirements for Process Operations</b> Maintain the following records for process operations: a. Total quantity of all materials used or produced in each process that are necessary to calculate emissions. b. Hours of operation of each process. c. Distribution of the process discharges if the process discharges air pollutants through more than one discharge point; and d. Safety Data Sheets (SDSs) or other documentation containing the concentration of total VOCs, each HAP and RTAP in each raw material used.	Monthly	EU01, EU02, EU05, EU06, EU11, EU12	Env-A 903.02
5.	<b>General Recordkeeping Requirements for Combustion Devices</b> Maintain records of fuel characteristics and utilization for the fuel used in the combustion device.	Monthly	EU13	Env-A 903.03

Table 5 - Recordkeeping Requirements				
Item #	Requirement	Duration/Frequency	Applicable Unit	Regulatory Basis
6.	<p><b>VOC Emission Statements Recordkeeping Requirements</b></p> <p>If the actual annual VOC emissions from all permitted devices located at the Facility are greater than or equal to 10 tpy, then record the following information:</p> <ul style="list-style-type: none"> <li>a. Identification of each VOC-emitting process or device;</li> <li>b. The operating schedule during the high ozone season (June 1 through August 31) for each VOC-emitting process or device identified in (a.) above, including:                             <ul style="list-style-type: none"> <li>1. Typical hours of operation per day; and</li> <li>2. Typical days of operation per calendar month.</li> </ul> </li> <li>c. The following VOC emission data from all VOC-emitting processes or devices identified in (a.) above, including:                             <ul style="list-style-type: none"> <li>1. Actual monthly VOC emissions, in tons;</li> <li>2. Typical high ozone season day VOC emissions, in pounds per day; and</li> <li>3. The emission factors and the origin of the emission factors used to calculate the VOC emissions.</li> </ul> </li> </ul>	Maintain Data for Annual Report	EU01, EU02, EU05, EU06, EU11, EU12	Env-A 904
7.	<p><b>VOC Recordkeeping for Surface Coating and Printing Operations</b></p> <p>Record the following information for each coating or printing operation subject to Env-A 1200:</p> <ul style="list-style-type: none"> <li>a. Coating formulation and analytical data, as follows:                             <ul style="list-style-type: none"> <li>1. Supplier;</li> <li>2. Name and color;</li> <li>3. Type;</li> <li>4. Identification number;</li> <li>5. Density described as lb/gal;</li> <li>6. Total volatile content described as weight percent;</li> <li>7. Water content described as weight percent;</li> <li>8. Exempt solvent content described as weight percent;</li> <li>9. VOC content described as volume percent;</li> <li>10. Solids content described as volume percent;</li> <li>11. Diluent name and identification number;</li> <li>12. Diluent solvent density described in lb/gal;</li> <li>13. Diluent VOC content described as weight percent;</li> <li>14. Diluent exempt solvent content described as weight percent;</li> <li>15. Volume of diluent VOC described as gal; and</li> <li>16. Diluent/solvent ratio described as gal diluent solvent per gal coating.</li> </ul> </li> <li>b. The number of gallons of each coating, including solvents and diluents, utilized during a typical high ozone season day; and</li> <li>c. Process information for a typical high ozone season day, including:                             <ul style="list-style-type: none"> <li>1. Method of application;</li> <li>2. Number of coats;</li> <li>3. Drying method; and</li> <li>4. Substrate type and form.</li> </ul> </li> </ul>	Maintain Current Data	EU01, EU02	Env-A 904.03

Table 5 - Recordkeeping Requirements				
Item #	Requirement	Duration/ Frequency	Applicable Unit	Regulatory Basis
8.	<p><b>NSPS – Polymeric Coating of Supporting Substrates VOC Recordkeeping Requirements</b></p> <p>For each coating line, the owner or operator shall maintain records of:</p> <ol style="list-style-type: none"> <li>Actual consecutive 12-month VOC use; and</li> <li>The semiannual estimates of projected VOC use.</li> </ol>	Maintain Current Data	EU01, EU02	40 CFR 60.744(b)(2), 60.747(c)(1) Subpart VVV
9.	<p><b>Recordkeeping for Sources or Devices with Add-on Air Pollution Control Equipment</b></p> <p>Record the following information for PCE01 (Boiler #2) and EU13/PCE02 (Biomass gasification unit) when used as a control device:</p> <ol style="list-style-type: none"> <li>The air pollution control device identification number, type, model number, and manufacturer;</li> <li>Installation date;</li> <li>Process or devices controlled;</li> <li>The type and location of the capture system, capture efficiency percentage, and method of determining capture efficiency;</li> <li>Information as to whether or not the control device is always in operation when the processes or devices are in operation; and</li> <li>The destruction or removal efficiency of the control device, including: <ol style="list-style-type: none"> <li>Destruction or removal efficiency, in percent;</li> <li>Date tested; and</li> <li>The emission test results, including: <ol style="list-style-type: none"> <li>The inlet VOC concentration, in ppm;</li> <li>The outlet VOC concentration, in ppm; and</li> <li>The method of determination of the above concentrations.</li> </ol> </li> </ol> </li> <li>The design combustion temperature in degrees F.</li> </ol>	Maintain Current Data	PCE01, PCE02	Env-A 904.08, 40 CFR 60.465(e) Subpart TT
10.	<p><b>Additional Recordkeeping Requirements: Pollution Control Equipment</b></p> <p>Maintain records of all air pollution control equipment activities required in Table 4, including:</p> <ol style="list-style-type: none"> <li>Equipment operation and visual equipment checks.</li> <li>Daily combustion chamber temperature readings.</li> <li>Date, time, duration and probable cause of pollution control equipment monitoring parameter excursions.</li> <li>Air pollution control equipment maintenance activities.</li> <li>Corrective actions and preventative measures taken; and</li> <li>Method 9 observations<sup>11</sup>.</li> </ol>	As specified in Table 4	PCE01, EU13/PCE02	Env-A 906, 40 CFR 60.465(e) Subpart TT
11.	<p><b>NESHAP for Area Sources: Industrial, Commercial and Institutional Boilers – Recordkeeping Requirements</b></p> <p>The owner or operator shall maintain the following records:</p> <ol style="list-style-type: none"> <li>A copy of each notification and report that the owner or operator submitted to comply with 40 CFR 63, Subpart</li> </ol>	Maintain on a continuous basis	EU13	40 CFR 63.1125(c), 63.1125(d), 63.11223(b)(6) Subpart JJJJJ

<sup>11</sup> If a Method 9 test is conducted, the records shall include a copy of the certification for the person who conducted the test.

Table 5 - Recordkeeping Requirements				
Item #	Requirement	Duration/Frequency	Applicable Unit	Regulatory Basis
	<p>JJJJJ, and all documentation supporting any Initial Notification or Notification of Compliance Status submitted.</p> <p>b. Records to document conformance with the work practices, emission reduction measures, and management practices which must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer’s specifications to which the boiler was tuned.</p> <p>c. The records must be in a form suitable and readily available for expeditious review; and</p> <p>d. Maintain on-site and submit, if requested by the USEPA, Region 1 or the department, a report containing the following information:</p> <ol style="list-style-type: none"> <li>1. The concentrations of CO in the effluent stream in parts per million, by volume and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;</li> <li>2. A description of any corrective actions taken as a part of the tune-up of the boiler;</li> <li>3. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler. Units sharing a fuel meter may estimate the fuel used by each unit.</li> </ol>			
12.	<p><b>Permit Deviation Recordkeeping</b> Maintain records of each permit deviation which result in excess emissions or monitoring parameter excursions lasting 48 hours or more. The content of the records is specified in Condition IX.B.2.(e through n).</p>	As specified	EU01, EU02, PCE01, EU13/PCE02	Env-A 911.03
13.	<p><b>NSPS – Permit Deviation Recordkeeping</b> Maintain records of all periods during actual coating operations in excess of 3 hours during which the average temperature in any boiler that is used to control emissions from metal coil coating remains more than 50° F below the temperature determined during the most recent stack test required in Table 4, Item 6.</p>	For each occurrence and duration	EU02, PCE01, PCE02	40 CFR 60.464(c) Subpart TT

**VIII. Reporting Requirements**

- A. Pursuant to Env-C 203.02(b), *Date of Issuance or Filing*, written documents shall be deemed to have been filed with or received by the department on the actual date of receipt by the department, as evidenced by a date stamp placed on the document by the department in the normal course of business.
- B. All emissions data submitted to the department shall be available to the public. Claims of confidentiality for any other information required to be submitted to the department pursuant to this permit shall be made at the time of submission in accordance with Env-C 208.04, *Initial Claim of Confidentiality*.
- C. The owner or operator shall be subject to the reporting requirements identified in Table 6 below.

Table 6 - Reporting Requirements

Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis
1.	<p><b>General Reporting Requirements</b></p> <p>a. Each report shall be separately and clearly labeled with:</p> <ol style="list-style-type: none"> <li>1. The name, mailing address and physical address of the source covered by the report.</li> <li>2. The operating period covered by the report.</li> <li>3. The permit number and condition or item number that requires the report submittal.</li> <li>4. The type of report, using the name of the report as specified in the reporting condition in the permit, that is being submitted; and</li> <li>5. The date the report was prepared.</li> </ol> <p>b. An owner or operator who submits a report that is a revision to a previously submitted report shall clearly identify the revised report with the information specified in (a.) above and indicate which portions of the report have been revised.</p> <p>c. The owner or operator may submit more than one report with a single cover, provided the owner or operator clearly identifies each report being submitted using the information required in (a.) and (b.) above, if applicable, for each report; and</p> <p>d. The owner or operator shall submit reports as paper documents or by electronic means.</p>	For each report submitted to the department	Facility Wide	Env-A 907.01
2.	<p><b>Annual Emissions Report</b></p> <p>Submit an annual emissions report which shall include the following information:</p> <p>a. Actual calendar year emissions from each fuel burning device of:</p> <ol style="list-style-type: none"> <li>1. NOx</li> <li>2. Total VOCs</li> <li>3. Filterable PM</li> <li>4. CO; and</li> <li>5. SO<sub>2</sub></li> </ol> <p>b. Actual calendar year emissions from process devices of each HAP and RTAP reported by CAS number.</p> <p>c. The methods used in calculating such emissions in accordance with Env-A 705.03, <i>Determination of Actual Emissions for Use in Calculating Emission-Based Fee</i>.</p> <p>d. The emission factors and the origin of the emission factors; and</p> <p>e. All information recorded in accordance with Table 5, Items 4.(a.), 4.(b.), 4.(c.), and 5.</p>	Annually (received by the department no later than April 15th of the following year)	EU01, EU02, EU05, EU06, EU11, EU12, EU13	Env-A 907.02
3.	<p><b>VOC Emission Statements Reporting Requirements</b></p> <p>If the actual annual VOC emissions from all permitted devices located at the Facility are greater than or equal to 10 tpy, then include all the data recorded in accordance with Table 5, Item 6 with the annual emission report.</p>	Annually (received by the department no later than April 15th of the following year)	EU01, EU02, EU05, EU06, EU11, EU12, EU13/PCE02, PCE01	Env-A 908

Table 6 - Reporting Requirements

Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis
4.	<p><b><i>Air Pollution Control Equipment Monitoring Plan</i></b> If the owner or operator determines that the information and procedures documented in the Air Pollution Control Equipment Monitoring Plan submitted with Application 22-0090 need to be changed at any time to accurately represent the activities performed to maintain the control equipment, the owner or operator shall submit a revised monitoring or management plan, as applicable, to the department in writing.</p>	Submit to the department within 30 days of any change to the plan	PCE01, PCE02	Env-A 810.01(e)
5.	<p><b><i>NESHAP for Area Sources: Boiler Compliance Certification Report</i></b> The owner or operator shall prepare the following data and submit the report upon request of the USEPA Region 1 or the department:</p> <ol style="list-style-type: none"> <li>a. Company name and address.</li> <li>b. Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The notification must include the following certifications of compliance, as applicable: <ol style="list-style-type: none"> <li>1. "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up of each boiler"; and</li> <li>2. "No secondary materials that are solid waste were combusted in any affected unit".</li> </ol> </li> </ol>	Prepared biennially no later than March 1st and submitted to USEPA Region 1 and the department upon request	EU13	40 CFR 63.11225(b) Subpart JJJJJ
6.	<p><b><i>NESHAP for Area Sources: Boiler Reporting Requirements – Fuel Switch</i></b> If the owner or operator intends to switch fuels, and this fuel switch may result in the applicability of a different subcategory or a switch into Subpart JJJJJ, the owner or operator must submit the following to USEPA Region 1 and the department:</p> <ol style="list-style-type: none"> <li>a. The name of the owner or operator.</li> <li>b. The company's address.</li> <li>c. The boiler(s) that will/have switched fuels.</li> <li>d. The date of the notice.</li> <li>e. The currently applicable subcategory under subpart JJJJJ.</li> <li>f. The date on which the facility became subject to subpart JJJJJ; and</li> <li>g. The date upon which the fuel switch will/has commenced.</li> </ol>	Within 30 days of the fuel switch, physical change or issuance of a permit	PCE01	40 CFR 63.11225(g) Subpart JJJJJ
7.	<p><b><i>NSPS – Metal Coil Surface Coating Reporting Requirements</i></b> The owner or operator shall identify, record, and submit a written report as follows:</p> <ol style="list-style-type: none"> <li>a. Every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than that limit specified in Table 3, Item 8; or</li> </ol>	As specified	EU02, PCE01, PCE02	40 CFR 60.465(c), 60.465(d) Subpart TT

Table 6 - Reporting Requirements				
Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis
	b. Semiannually if there were no such instances where the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than that limit specified in Table 3, Item 8; and c. Submit reports semiannually of the information recorded in accordance with Table 5, Item 13'. If there were no deviations, the owner or operator shall state this in the report.			
8.	<b>NSPS – Polymeric Coating of Supporting Substrates</b> The owner or operator shall report: a. The first semiannual estimate in which projected annual VOC use exceeds the cutoff of 95 Mg of VOC per year; and b. The first 12-month period in which the actual annual VOC use exceeds the applicable cutoff of 95 Mg of VOC per year.	As specified	EU01, EU02	40 CFR 60.747(c) Subpart VVV
9.	<b>Permit Deviation Reporting Requirements</b> Report permit deviations that cause excess emissions, or monitoring parameter excursions lasting 48 hours or more, in accordance with Condition IX.B.	As specified	EU01, EU02, PCE01,EU13/ PCE02	Env-A 911.04
10.	<b>Annual Emission Fee</b> Pay annual emission fee in accordance with Condition XII.	Annually (received by department no later than May 15th of the following year)	EU01, EU02, EU05, EU06, EU11, EU12, EU13	Env-A 705

**IX. Permit Deviation Reporting Requirements**

- A. Env-A 100, Purpose; Definitions:
  - 1. A permit deviation is any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in either a Title V permit, state permit to operate, temporary permit or general state permit issued by the department.
  - 2. An *excess emission* is an air emission rate that exceeds any applicable emission limitation.
  - 3. An *emission limitation* means "emission limitation" as defined in section 302(k) of the Act, namely "a requirement established by the State or the Administrator which limits the quantity, rate, or concentration of emissions of air pollutants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice or operational standard promulgated under this Act." This term includes "emission standard".
- B. Env-A 911.04, *Reporting Requirements*: In the event of a permit deviation that causes excess emissions, or for pollution control equipment monitoring parameter excursions lasting more than 48 hours in duration:
  - 1. Notify the department of the permit deviation and excess emissions by telephone (603-271-1370), fax (603-271-7053) or e-mail (pdeviations@des.nh.gov), within 24 hours of discovery of the permit deviation, unless it is a Saturday, Sunday, or state legal holiday, in which event, the department shall be notified on the next day which is not a Saturday, Sunday, or state legal

- holiday.
2. Submit a written report of the deviation on paper or by electronic means to the department within 10 days of discovery of the permit deviation reported above. The report shall include all of the following information:
    - a. Facility name;
    - b. Facility address;
    - c. Name of the responsible official;
    - d. Facility telephone number;
    - e. A description of the permit deviation, including the applicable permit number and permit condition(s);
    - f. The probable cause of the permit deviation;
    - g. The date and time of the discovery of the permit deviation;
    - h. The actual date(s) and time(s) of the permit deviation;
    - i. The duration of the permit deviation, including the date and time that the device, process or air pollution control equipment returned to operation in compliance with an enforceable emission limitation or operating condition;
    - j. The specific device, process or air pollution control equipment that contributed to the permit deviation;
    - k. Any corrective measures taken to address the permit deviation;
    - l. Preventative measures taken to prevent future permit deviations;
    - m. The type and amount of excess emissions that occurred as a result of the permit deviation; and
    - n. The calculation or estimation used to quantify the excess emissions.

#### **X. Permit Amendments**

- A. Env-A 612.01, *Administrative Permit Amendments*:
  1. An administrative permit amendment includes the following:
    - a. Corrects typographical errors;
    - b. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
    - c. Requires more frequent monitoring or reporting; or
    - d. Allows for a change in ownership or operational control of a source provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the department.
  2. The owner or operator may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
- B. Env-A 612.03, *Minor Permit Amendments: Temporary Permits and State Permits to Operate*:
  1. The owner or operator shall submit to the department a request for a minor permit amendment for any proposed change to any of the conditions contained in this permit which does not qualify as either an administrative or significant amendment.
  2. The request for a minor permit amendment shall be in the form of a letter to the department and shall include the following:
    - a. A description of the proposed change; and
    - b. A description of any new applicable requirements that will apply if the change occurs.
  3. The owner or operator may implement the proposed change immediately upon filing a request for the minor permit amendment, but shall be subject to enforcement if the department later determines that the change violated any applicable state or federal requirement.
- C. Env-A 612.04, *Significant Permit Amendments: Temporary Permits and State Permits to Operate*:
  1. The owner or operator shall submit a written request for a permit amendment to the



department prior to the implementation of any proposed change which meets one of the following:

- a. Any proposed change to an existing process or device that results in the following:
    - i. Any increase in allowable hourly or annual emissions of NO<sub>x</sub>, SO<sub>2</sub>, VOCs, HAPs or PM<sub>10</sub>; or
    - ii. Any increase in potential emissions equal to or greater than 5 lb/hr of CO;
  - b. Any proposed change to operating or emission limitations;
  - c. Any proposed change in the type of pollution control equipment; or
  - d. Any proposed change that results in an increase in previously-allowed loading of existing pollution control equipment by greater than 50%.
2. A request for a significant permit amendment shall include the following:
    - a. A complete application form, as described in Env-A 1703 through Env-A 1708, as applicable;
    - b. A description of:
      - i. The proposed change;
      - ii. The emissions resulting from the change; and
      - iii. Any new applicable requirements that will apply if the change occurs; and
    - c. Where air pollution dispersion modeling is required for a device pursuant to Env-A 606.02, the information required pursuant to Env-A 606.04.
    - d. An air pollution control equipment monitoring plan or catalyst management plan pursuant to Env-A 810.01.
  3. The owner or operator shall not implement the proposed change until the department issues the amended permit.

#### **XI. Inspection and Entry**

Department personnel shall be granted access to the facility covered by this permit, in accordance with RSA 125-C:6, VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement found in the New Hampshire Rules Governing the Control of Air Pollution and/or conditions of any permit issued pursuant to Chapter Env-A 600.

#### **XII. Annual Emission Fee Requirements**

- A. Env-A 705.02, *Annual Emission Fee*: The owner or operator shall pay to the department each year an annual emission fee consisting of an emission-based fee calculated pursuant to (C.) below and a baseline emission fee stated in (D.) below. The owner or operator shall submit, to the department, payment of the annual emission fee so that the department receives it on or before May 15th for emissions during the previous calendar year. For example, the fees for calendar year 2022 shall be received on or before May 15, 2023.
- B. Env-A 705.03, *Determination of Actual Emissions for use in Calculating of Emission-based Fee*: The owner or operator shall determine the total actual annual emissions from the emission units listed in Table 1 for each calendar year in accordance with the methods specified in Env-A 705.03.
- C. Env-A 705.04, *Calculation of Emission-based Fee*: The owner or operator shall calculate the annual emission-based fee for each calendar year in accordance with the procedures specified in Env-A 705.04 and the following equation:

$$FEE = E * DPT$$

where:

FEE = The annual emission-based fee for each calendar year as specified in Env-A 705;

E = Total actual emissions as determined pursuant to (B.) above; and

DPT = The annual fee, in dollars per ton of emissions, which the department has calculated in accordance with Env-A 705.04.

- D. Env-A 705.06, *Payment of Annual Baseline Emission Fee*: In addition to the annual emission-based fee, the owner or operator shall pay to the department each year an annual baseline emission fee pursuant to the following:
1. Env-A 705.07(a), \$3,250; and
  2. Env-A 705.06(c), If the owner or operator is not required to pay an emission-based fee for any calendar year because the Facility had zero reportable emissions, the annual baseline fee shall be \$500 in lieu of the fee stated in (D.)(1.) above.