



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

August 13, 2013

Chris Gilman
Saint-Gobain Performance Plastics Corp.
701 Daniel Webster Hwy
Merrimack, NH 03054

RE: On-Site Full Compliance Evaluation Report

Dear Mr. Gillman

The New Hampshire Department of Environmental Services (“DES”) has completed a Full Compliance Evaluation of Saint Gobain Performance Plastics Corp. The compliance evaluation included an on-site inspection completed on July 23, 2013. This is a copy of the On-Site Full Compliance Evaluation Report for your records.

DES identified deficiencies during this compliance evaluation, as detailed in this report. The results of this compliance evaluation will be forwarded to the Enforcement Section for further review.

If you have any questions, please do not hesitate to give Tom Guertin a call at (603) 271-0907 or reach him by email at Thomas.guertin@des.nh.gov.

Sincerely,

Greg Helve
Compliance Section Supervisor
Air Resource Division

cc: Town Manager, Town of Merrimack, 6 Baboosic Lake Rd., Merrimack, NH 03054

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 unit
CAS	Chemical Abstracts Service
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
DER	Discrete Emission Reduction
DES	New Hampshire Department of Environmental Services
Env-A	New Hampshire Code of Administrative Rules – Air Resource Division
ERC	Emission Reduction Credit
ft	foot or feet
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hp	horse power
hr	hour
kW	kilowatt
lb	pound
LPG	liquefied petroleum gas (propane)
MM	million
MSDS	Material Safety Data Sheet
MW	megawatt
NAAQS	National Ambient Air Quality Standard
NG	natural gas
NO _x	oxides of nitrogen
NSPS	New Source Performance Standard
PM ₁₀	Particulate Material <10 micron
ppm	part per million
psi	pounds per square inch
RACT	Reasonably Available Control Technology
RSA	Revised Statue Annotated
RTAP	Regulated Toxic Air Pollutant
scf	Standard cubic foot (feet)
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulate
tpy	tons per year
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

I. Facility Description

DES conducted on On-Site Full Compliance Evaluation (“FCE”) of Saint Gobain Performance Plastics Corp. (“The Source”). This FCE covers the period from January 1, 2008 to July 23, 2013 and the results are presented herein.

The Source primarily manufactures polytetrafluoroethylene (PTFE) coated fabrics and PTFE films. The fabrics are used in a variety of chemical and weather resistant applications.

Facility Name and Address	Saint Gobain Performance Plastics Corp. 701 Daniel Webster Hwy Merrimack, NH 03054
County	Hillsborough
Telephone	(603) 424-9000
AFS#	3301100165
Permit Type	✓ SM-80
Inspection Date/Time	July 23, 2012
Inspection Type	On-Site FCE
Weather	85°F, Wind-SSW, Overcast, rain
Inspected by	Thomas Guertin, Sr. Compliance Assessment Specialist
Source Contact(s)	John Nolan, Plant Manager
Last inspection	February 28, 2008
<p>Last Inspection Results:</p> <ol style="list-style-type: none"> 1. The Source failed to submit Annual Emission Statements for 2003 and 2004 so that they were received by DES on or before April 15 of the year following the emissions year; 2. The Source failed to include in its Annual Emission Statements monthly facility wide emissions of NO_x, CO, PM₁₀, SO₂, TSP and monthly VOC emissions; 3. The Source failed to include a NO_x Emission Statement for 2004 through 2006 in its Annual Emission Statements; and 4. The Source failed to document semi-annual estimates of VOC usage for 2004, 2006 and 2007 as required by 40 CFR 60 Subpart VVV. <p>Items 1-3 have since been corrected. Item 4 was found to be deficient again during this compliance evaluation.</p>	

Permit Number(s):

SP-0072 Issued: December 17, 2009
 Expires: December 31, 2014

The FCE included an opening meeting to discuss the purpose of the inspections well as the rules pertaining to claims of confidentiality and facility safety concerns. The Source agreed to the inspection and authorized access to the facility. Material provided and operations conducted by the Source at the time of the inspection was not claimed to be confidential.

II. Emission Unit Identification and Facility Wide Emissions

Table 1 below is taken from the permit and lists the permitted emission units.

Table 1 – Emission Unit Identification			
Emission Unit ID	Process	Installation Date	Max Design Capacity
EU01	Tower MA	1994	The maximum square feet per minute of fabric as stated in the email submittal dated October 5, 2009 as an addendum to Application #08-0335 is incorporated by reference into the permit.
EU02	Tower MB	1998	
EU03	Tower MC	1998	
EU04	Tower MR	2002	
EU05	Tower MC	1999	
EU06	Tower QX	1989	
EU07	20-inch SBC	1986	
EU08	20-inch Coater	1986	
EU09	Tower MH	2002	
EU10	Tower MX	2002	
EU11	Tower ME	2002	
EU12	Tower MG	2002	
EU13	Tower MP	2002	
EU14	Tower MI	2003	
EU15	Tower MQ	2002	
EU16	Tower MS	2002	
EU17	Antenna Coating	1993	

DES observed the devices identified in this table and the facility has made no changes to these devices nor has it added devices classified as significant or insignificant activities.

The table below lists the facility-wide reported annual emissions for the review period.

Facility Wide Reported Annual Emissions							
	Nitrogen Oxides (tpy)	Sulfur Dioxide (tpy)	Carbon Monoxide (tpy)	Particulate Matter (tpy)	VOCs (tpy)	HAPs	RTAPs
Permitted Limits	-	-	-	-	<50	-	
2012	7.26	0.11	6.08	0.14	29.39	4.58	4.79
2011	8.24	0.05	6.92	0.16	30.51	4.75	4.96
2010	7.57	0.05	6.36	0.14	32.11	7.92	8.49
2009	6.75	0.04	5.67	0.13	21.14	6.47	6.55
2008	7.97	0.05	6.70	0.15	30.46	9.9	10.0

III. Control Equipment

There is no air pollution control equipment required for the devices listed in Table 1.

IV. Stack Criteria

Modeling was not performed at this facility because compliance with Env-A 1400 was shown based on de minimus emission rates or the adjusted in-stack concentration methods. All stacks are vertical and unobstructed.

V. Compliance with Operating and Emission Limitations

Table 2 below, taken from the permit, lists the operational and emission limitations for the facility as well as any deficiencies noted during the evaluation.

Table 2 – Operational and Emission Limitations				
Item #	Applicable Requirement	Emission Unit	Rule Citation	Compliant?
1.	<u>Facility-Wide Emission Limitations</u> The Facility-wide emissions of VOCs shall be limited to less than 50 tpy	Facility Wide	Env-A 604.02(a)(1)	Yes
2.	<u>Facility-Wide HAP Emission Limitations</u> Facility-wide emissions of Hazardous Air Pollutants (HAPS as defined in Section 112 of the 1990 Clean Air Act Amendments) shall be limited to less than 10 tpy for any individual HAP and 25 tpy for all combined HAPs.	Facility Wide	Env-A 604.02(a)(1)	Yes
<p><i>Findings: The Source reports combined HAP and RTAP emissions. Since the total of all combined RTAPs and HAPs emitted during each emissions year is less than the 10 tpy threshold for an individual HAP, it stands to reason that the emissions for each individual HAP is below the 10 tpy threshold. In the future, DES recommends that the source report HAP and RTAP emission separately in the event the source approaches either threshold.</i></p>				

Table 2 – Operational and Emission Limitations

Item #	Applicable Requirement	Emission Unit	Rule Citation	Compliant?
3.	<p><u>24-Hour and Annual Ambient Air Limit</u> 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 Containing the List Naming All Regulated Toxic Air Pollutants</i>.</p> <p>Compliance was demonstrated at the time of permit issuance as described in the Division’s Application Review Summary for application #80-0335. The source must update the compliance demonstration using one of the methods provided in Env-A 1405 if:</p> <ul style="list-style-type: none"> a. There is a revision to the list of RTAPs lowering the AAL for any RTAP emitted from the facility; b. 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 used); or d. Stack conditions (e.g., air flow rate) change. 	Facility Wide	Env-A 1400	No
<p>Findings: The source did not maintain the records necessary to demonstrate compliance with this requirement.</p>				
4.	<p><u>Revisions of the List of RTAPS</u> In accordance with RSA 125-I:5 IV, if the Division 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 o 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.</p>	Facility Wide	RSA 125-I:5 IV	Unknown
<p>Findings: The Source failed to demonstrate compliance with Env-A 1400 Regulated Toxic Air Pollution; hence, it is unknown whether or not a permit modification is necessary.</p>				
5.	<p><u>Visible Emission Standard</u> The average opacity shall not exceed 20 percent for any continuous 6-minute period. Except one 6 minute continuous period in any 60 minute period during startup, shutdown or malfunction.</p>	EU01 – EU17	Env-A 2103.02	Yes

Table 2 – Operational and Emission Limitations				
Item #	Applicable Requirement	Emission Unit	Rule Citation	Compliant?
6.	<u>Applicability Criteria and Compliance Standards for Coating of Paper, Fabric, Film and Foil Substrates</u> The coating processes shall be limited at all times to an emission rate of 2.9 lb of VOC/gal of coating, as applied, excluding water and exempt compounds.	EU01 – EU17	Env-A 1204.10	Unknown
Findings: The Source stated that it used several coatings that exceeded the 2.9lb VOC/gal limit during the inspection period. The Source may be able to show compliance by the use of a “Bubbling” method for the period during which the noncompliant coatings were used.				
7.	<u>Sulfur Content Limitations for Gaseous Fuels</u> Gaseous fuels shall contain no more than 15 grains of sulfur per 100 cubic feet of gas at standard temperature and pressure.	EU01 – EU16	Env-A 1605.01	Yes

VI. Compliance with Monitoring and Testing Requirements

Table 3 below, taken from the permit, lists the monitoring and testing requirements for the facility, and any discrepancies noted during the evaluation.

Table 3 – Monitoring and Testing Requirements						
Item #	Parameter	Applicable Requirement	Frequency	Rule Citation	Applicable Unit	Compliant?
1.	To Be Determined	When conditions warrant, the Division may require the Owner or Operator to conduct stack testing in accordance with USEPA or other Division approved methods.	Upon request by the Division	RSA 125-C:6,XI	Facility Wide	Not Applicable
Findings: DES has not required the Source to conduct stack testing, to date.						
2.	Sulfur content of gaseous fuels	Conduct testing to determine the sulfur content in grains of sulfur per 1000 cubic feet of gaseous fuels.	Upon written request by USEPA or the Division	Env-A 806.03	Facility Wide	Yes

VII. Compliance with Recordkeeping Requirements

Table 4 below, taken from the permit, lists the recordkeeping requirements for the facility, and any deficiencies noted during the evaluation.

Table 4 – Recordkeeping Requirements					
Item #	Applicable Requirement	Frequency/ Duration	Applicable Unit	Regulatory Basis	Compliant?
1.	<u>Record Retention and Availability</u> Keep the required records on file. These records shall be made available for review by the Division upon request.	Retain for a minimum of 5 years.	Facility Wide	Env-A 902	Yes
2.	<u>Regulated Toxic Air Pollutants</u> Maintain records documenting compliance with Env-A 1400	Maintain Up-To-Date Data	Facility Wide	Env-A 902.01	No
Findings: The source failed to maintain the records necessary to demonstrate compliance as required by Table 5, Item 2 of the permit.					
3.	<u>Additional Recordkeeping Requirements: Facility-Wide</u> Maintain a 12-month running total of Facility-wide emissions of VOCs and HAPs, which shall include emissions from non-permitted devices, for the purpose of demonstrating that the total emissions of these pollutants are below the major source thresholds for these pollutants.	Monthly	Facility Wide	Env-A 906 and Env-A 604.02(a)(3)	No
Findings: The source failed to maintain a 12-month running total of HAPs as required by Table 4, Item 3 of the permit.					
4.	<u>General Recordkeeping Requirements for Process Operations</u> a. Total quantity of raw materials containing VOCs or RTAPs ; and b. Hours of operation of each process.	Monthly	EU01-EU17	Env-A 903.02	Yes
5.	<u>VOC Emission Statements Recordkeeping Requirements</u> If the actual VOC emissions from all permitted devices located at the facility are greater than or equal to 10 tpy, then record the following information: a. Identification of each VOC-emitting process or device; 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: 1. Typical hours of operation per day; and 2. Typical days of operation per calendar month. c. The following VOC emission data from all VOC-emitting processes or devices identified in Table 4, Item 5.a of the permit including: 1. Actual VOC emissions for: i. The calendar year, in tons; and ii. A typical high ozone season	Maintain Up-To-Date Data	EU01-EU17	Env-A 904	Yes

Table 4 – Recordkeeping Requirements

Item #	Applicable Requirement	Frequency/ Duration	Applicable Unit	Regulatory Basis	Compliant?
	<p>day during that calendar year, in pounds per day; and</p> <p>2. The emission factors and the origin of the emission factors used to calculate the VOC emissions.</p>				
6.	<p><u>VOC Recordkeeping for Surface Coating and Printing Operations</u></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 for each coating operation identified in Table 4, Item 5, above:</p> <p>a. Records for coating formulation and analytical data shall be kept for all base coatings and all mixtures not specifically exempted in d. below, as follows:</p> <ol style="list-style-type: none"> 1. Supplier; 2. Name and color; 3. Type; 4. Identification number; 5. Density described as lb/gal; 6. Total volatile content described as weight percent; 7. Water content described as weight percent; 8. Exempt solvent content described as weight percent; 9. VOC content described as weight percent; 10. Solids content described as weight percent; 11. Diluent name and identification number; 12. Diluent solvent density described in lb/gal; 13. Diluent VOC content described as weight percent; 14. Diluent exempt solvent content described as weight percent; 15. Volume of diluent VOC described as gal; and 16. Diluent/solvent ration described as gal diluent solvent per gal of coating. <p>b. The number of gallons of each coating, including solvents and diluents, used during a typical high ozone season day; and</p> <p>c. Process information for a typical high ozone season day, including:</p> <ol style="list-style-type: none"> 1. Method of application; 2. Number of coats; 3. Drying method; and 4. Substrate type and form. <p>d. The following mixtures shall be exempt from the recordkeeping in item a. above, provided that the base coatings used in the mixtures comply with the VOC RACT requirement stated in Table 2, Item 6. of the permit</p>	<p>Maintain Up-To-Date Data</p>	<p>EU01-EU17</p>	<p>Env-A 904.03</p>	<p>Yes</p>

Table 4 – Recordkeeping Requirements

Item #	Applicable Requirement	Frequency/ Duration	Applicable Unit	Regulatory Basis	Compliant?
	1. Coatings that use water as the only diluent in the mixture' and Coatings that do not use solvent-based diluents.				
7.	<u>Format for Recording Information</u> The information recorded pursuant to Table 4, Item 6 of the permit shall be recorded on a standard form included in the <i>Recordkeeping Guidance Document for Surface Coating Operations and the Graphic Arts Industry</i> , USEPS, July, 1998, or alternative form that contains all the data recorded pursuant to Table 4, Item 6 of the permit.	Maintain Up-To-Date Data	EU01-EU17	Env-A 904.04	Yes
8.	<u>General Recordkeeping Requirements for Combustion Devices</u> Maintain records of the type (e.g. diesel fuel, natural gas) and amount of fuel burned in each device, <u>or</u> type and amount of fuel burned in multiple devices and the hours of operation of each device to be used to apportion the fuel use between the multiple devices.	Monthly	EU01-EU16	Env-A 903.03	Yes
9.	<u>Gaseous Fuel Recordkeeping Requirements</u> Maintain one of the following: a. Sulfur content as percent sulfur by weight or in grains per 100 cubic feet of fuel; b. Documentation that the fuel source is from a utility pipeline; or c. Documentation that the fuel meets state sulfur limits.	Whenever there is a change in natural gas supplier but at least annually	Facility Wide	Env-A 903.03	Yes
10.	<u>General NOx Recordkeeping Requirements</u> If the actual NOx emissions from all permitted devices located at the facility are greater than or equal to 10 tpy, then record the following information; a. Identification of each fuel burning device; b. Operating schedule during the high ozone season (June 1 through August 31) for each fuel burning device identified in Table 4, Item 10,a, above, including; 1. Typical hours of operation per day; 2. Typical days of operation per calendar month; 3. Number of weeks of operation; 4. Type and amount of each fuel burned; 5. Heat input rate in MMBtu/hr; 6. Actual NOx emissions for the calendar year; and Emission factors and the origin of the emission factors used to calculate NOx emissions.	Maintain Up-To-Date Data	EU01-EU16	Env-A 905.02	Not Applicable
Findings: The Source did not emit NOx in amounts that exceed 10 tpy.					
11	<u>NSPS Recordkeeping Requirements</u> Maintain records of estimates of the projected annual amount of VOCs to be used for the	Semiannual	EU01 – EU06 & EU09 –	40 CFR 60.744(b) (Subpart	No

Table 4 – Recordkeeping Requirements

Item #	Applicable Requirement	Frequency/ Duration	Applicable Unit	Regulatory Basis	Compliant?
	manufacture of polymeric coated substrates over the year.		EU17	VVV)	
Findings: The Source failed to maintain records of estimates of the projected annual amount of VOCs to be used as required by Subpart VVV.					

VIII. Compliance with Reporting Requirements

Table 5 below, taken from the permit, lists the reporting requirements for the facility, and any deficiencies noted during the evaluation.

Table 5 – Reporting Requirements

Item #	Applicable Requirement	Frequency	Applicable Unit	Rule Citation	Compliant?
1.	<u>Annual Emissions Report</u> Submit an annual emissions report which shall include the following information: a. Actual calendar year emissions from each emission unit of NOx, CO, SO2, TSP and VOCs (speciated by individual VOC), HAP (speciated by individual HAP), and RTAPs (speciated by individual RTAP); b. The method used to calculate such emissions in accordance with Env-A 705.02, <i>Determination of Actual Emissions for Use in Calculating Emission Based Fees</i> ; and c. All information recorded in accordance with Table 4, Items 4 and 8 of the permit.	Annually (received by DES no later than April 15 th of the following year)	EU01- EU17	Env-A 907.01	Yes
2.	<u>VOC Emission Statements Reporting Requirements</u> If the actual VOC emissions from all permitted devices located at the Facility are greater than or equal to 10 tpy, then include the following information with the annual emission report: a. Facility information, including: 1. Source name; 2. Standard Industrial Classification (SIC) code; 3. North American Industrial Classification (NAICS) code; 4. Physical and mailing addresses; and b. A breakdown of VOC emissions reported pursuant to Table 5, Item 1 of the permit, by month; and c. All data recorded pursuant to Table 4, Item 6 of the permit.	Annually (received by DES no later than April 15 th of the following year)	EU01- EU17	Env-A 908	No
Findings: The Source failed to include SIC code and NAICS Code in its VOC Emission Statements. In addition the Source failed to include all the data recorded pursuant to Table 4, Item 6 of the permit.					

Table 5 – Reporting Requirements

Item #	Applicable Requirement	Frequency	Applicable Unit	Rule Citation	Compliant?
3.	<p><u>NOx Emissions Statements Reporting Requirements</u> If the actual annual NOx emissions from all permitted devices located at the facility are greater than or equal to 10 tpy then include the following information with the annual emission report:</p> <p>a. A breakdown of NOx emissions reported pursuant to Table 5, Item 1 of the permit by month; and</p> <p>b. All data recorded in accordance with Table 4, Item 10.</p>	Annually (received by DES no later than April 15 th of the following year)	EU01-EU17	Env-A 909	Not Applicable
<p>Findings: The Source did not emit NOx in amounts that exceed 10 tpy.</p>					
4.	<p><u>NSPS Reporting Requirements</u> Submit to the Division and EPA Region 1 a report on the first semi-annual estimate in which projected annual VOC use exceeds 95 Mg.</p> <p>The address for the USEPA Region 1 is: USEPA Region 1 Attn: Air Compliance Clerk 1 Congress Street Suite 1100 Mail Code SEA Boston, MA 02114-2023</p>	As required	EU01-EU06 and EU09-EU17	40CFR60.74 7(c)(Subaprt VVV)	No
<p>Findings: The source was not able to demonstrate that it is projecting annual VOC usages and making submissions to the Division and EPA Region 1 when projected annual VOC use exceeds 95 Mg as required by Subpart VVV.</p>					
5.	<p><u>Permit Deviation Reporting Requirements</u> Report permit deviations that cause excess emissions in accordance with Condition VII.B of the permit</p>	Within 24 hours of discovery of excess emission	EU01-EU17	Env-A 911.04(b)	Yes
6.	<p><u>Emission based Fees</u> Pay emission based fees in accordance with Condition IX of the permit</p>	Annually (received by DES no later than April 15 th of the following year)	EU01-EU17	Env-A 700	Yes

IX. Permit Deviations

No permit deviations have been reported by the Source, during the inspection period.

X. Other Findings

No additional findings were identified during this inspection.

XI. Enforcement History and Status

On September 5, 2008 the Source was issued a Letter of Deficiency for several recordkeeping and recording deficiencies. Two of those deficiencies were identified as deficiencies during this inspection (see Section XII below).

XII. Compliance Assistance, Recommendations and Corrective Actions

DES makes the following recommendations to return the Source to compliance:

1. The Source shall provide Env-A 1400 Regulated Toxic Air Pollutants Compliance Demonstration as described in Table 2 Item 3 and 4, and Table 4, Items 2 and 4 of the permit. The source must demonstrate compliance by doing an accounting of all RTAP emissions at the facility and compare these usages with the corresponding 24 hour and Annual Ambient Air Limit. The Source may use any of the 3 methods outlined in the rule to show compliance which include *Di Minimis*, in-stack concentration method, or air dispersion modeling. The Source must use the most recent edition of the table found in Env-A 1450 (issued June 1, 2012).
2. The Source stated that it is using coating formulations that exceed the 2.9 lb/gal RACT standard in their permit. The Source may need to account for these excess emissions by either purchasing DERs (credits), if they used non-compliant coatings from 2008 to 2012. The Source may have the option to use a bubbling method of compliance determination for those years of operation. If it uses a bubble method and still does not meet the RACT requirements, it would need to purchase DERs. The Source acquires authority to purchase credits either from a RACT order or an enforcement action. For future emissions years, the Source may be able to bubble coating formulations as long as it shows compliance. If it bubbles and still does not comply, it would ultimately have to apply for a RACT Order. Alternatively, the Source could change formulations or install a control device in which case a RACT order would not be required. The Source must submit its RACT calculations for the VOC containing coatings as well as MSDS for all VOC containing materials.
3. For future emissions years, the Source shall demonstrate compliance with 40CFR60 subpart VVV by projecting VOC usages and reporting to DES and USEPA when the amount exceeds 95 metric tons. Report submissions must be made on the first semiannual (on or before July 31 of the emissions year). ***Failure to project VOC usages and report such projections to DES and USEPA when said projections exceed 95 metric tons was identified as a deficiency during the February, 2008 inspection.***

4. In future Annual Emission Reports during which greater than 10 tpy of VOCs is emitted, the Source must include records required by Env-A 904.03 *VOC Recordkeeping for Surface Coating and Printing Operations*, as specified in Table 4, Item 6 of the permit.
5. Submit an amended VOC Emission Statement Report for calendar year 2012, including SIC and NAICS codes, as well as the information required by Table 6, Item 2 of the permit.
6. For the inspection period, the Source shall provide a 12 month running total of HAPs as required by Table 4, Item 3 of the permit.
7. For future Annual Emission Statements, the Source shall quantify individual HAP emissions in order to show compliance with Env-A 604.02(a)(1); less than 10 tpy of any individual HAP and/or 25 tons of HAPs combined as required by Table 2, Item 2 of the permit. ***Failure to identify individual HAP and RTAP emissions was identified as a deficiency during the February, 2008 inspection.***

Submissions made pursuant to these deficiencies must be received by DES on or before September 9, 2013.

Report Prepared By	Thomas V. Guertin
Title	Sr. Compliance Assessment Specialist
Signed	