



State Permit to Operate

Permit No: SP-XXXX
Date Issued: TBD

This certifies that:

Saint-Gobain Performance Plastics Corporation
701 Daniel Webster Highway
Merrimack, NH 03054

has been granted a State Permit to Operate for:

Coated Fabrics and Films Manufacturing Operations and Two Emergency Engines

at the following facility and location:

Saint-Gobain Performance Plastics Corporation
701 Daniel Webster Highway
Merrimack, NH 03054

Facility ID No: 3301100165
Application No: 21-0198, received December 28, 2021
22-0092, received June 1, 2022, with additional information received on April 12, 2023

which includes devices that emit air pollutants into the ambient air as set forth in the permit applications referenced above, which were 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 TBD.

Director
Air Resources Division

Saint-Gobain Performance Plastics Corporation

Abbreviations and Acronyms

AAL	Ambient Air Limit
AGQS	Ambient Groundwater Quality Standard
ARD	Air Resources Division
ASTM	American Society of Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal units
CAS	Chemical Abstracts Service
CFR	Code of Federal Regulations
CO	Carbon Monoxide
Env-A	New Hampshire Code of Administrative Rules – Air Related Programs
ft	foot or feet
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutants (as defined in Section 112 of the 1990 Clean Air Act Amendments)
HF	Hydrogen Fluoride (as F)
hp	horsepower
hr	hour
kW	kilowatt
lb	pound
MM	million
NAAQS	National Ambient Air Quality Standard
NG	Natural Gas
NHDES	New Hampshire Department of Environmental Services (department)
NO _x	Oxides of Nitrogen
NSPS	New Source Performance Standard
PFAS	Per- and Polyfluorinated Substances
PFHxS	Perfluorohexane Sulfonic Acid
PFNA	Perfluorononanoic Acid
PFOA	Perfluorooctanoic Acid
PFOS	Perfluorooctane Sulfonic Acid (PFOS)
PM ₁₀	Particulate Matter < 10 microns
ppt	parts per trillion
ppm	parts per million
PTFE	Polytetrafluoroethylene
RACT	Reasonably Available Control Technology
RSA	Revised Statutes Annotated
RTAP	Regulated Toxic Air Pollutant
RTO	Regenerative Thermal Oxidizer
scf	standard cubic foot
scfm	standard cubic foot per minute
SDS	Safety Data Sheet
SO ₂	Sulfur Dioxide
SSD	Stationary Source Database
SWQS	Surface Water Quality Standard
TSP	Total Suspended Particulate
TPE	Theoretical Potential Emissions
tpy	tons per consecutive 12-month period
USEPA	United States Environmental Protection Agency
VOCs	Volatile Organic Compounds

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I. Facility Description

Saint-Gobain Performance Plastics Corporation (SGPP), 701 Daniel Webster Highway in Merrimack, NH primarily manufactures PTFE coated fabrics and PTFE films. The fabrics are manufactured for a variety of chemical and weather resistant applications. This permit covers seventeen coating/casting towers, laminators and finishing devices that are tied into the regenerative thermal oxidizer. The devices located at SGPP are subject to the application of BACT as defined in RSA 125-C:10-b, I(a).

The permit also covers an antenna cover fabrication area, a fire pump, and an emergency generator. The Facility is a synthetic minor source of air pollution for VOCs and HAPs. The Facility does not have the potential to emit the criteria pollutants SO₂, NO_x, CO, and PM₁₀ at levels greater than the major source thresholds for these pollutants. Therefore, the Facility is a true minor source for SO₂, NO_x, CO, and PM₁₀.

II. Emission Unit Identification

This permit covers the devices identified in Tables 1 and 2:

Table 1 - Emission Unit Identification					
Emission Unit ID	Device Name	Installation Date	Process Parameters		
			Maximum Product Width (in)	# of Stages	Maximum Production (ft ² /hr)
EU01	MA Tower	1994	60	1	6,000
EU02	MB Tower	1998	175	1	17,500
EU03	MC Tower	1998	92	1	9,200
EU04	MR Tower	2002	92	1	9,200
EU05	MD Tower	1999	92	2	9,200
EU06	QX Tower	1989	60	5	6,000
EU07	20" SBC	1986	20	6	500
EU08	20" Coater	1986	20	1	500
EU12	MG Tower	2002	175	1	4,375
EU13	MP Tower	2002	175	1	4,375
EU15	MQ Tower	2002	44	1	1,100
EU16	MS Tower	2002	92	1	2,300
EU17	Antenna Cover Fabrication Area	1993	N/A	N/A	N/A
EU22	R & D Coater	N/A	26	1	2,600
EU23	Chemsil Coater	N/A	38	1	3,800
EU24	MTM	N/A	50	1	5,000
EU25	Laminator	N/A	48	1	4,800
EU26	Heat Clean	N/A	N/A	1	N/A

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Table 2 – Emission Unit Identification: Additional Fuel Burning Equipment

Emission Unit ID	Emission Unit Description	Installation Date	Maximum Design Capacity & Permitted Fuel Types ¹
EU20	Clarke fire pump - Model JU4H-UFAD58 John Deere engine - Model 4045 Serial #PE4045L273937	2015	1.20 MMBtu/hr (110 bhp; 82 kW) ULSD – equivalent to 8.7 gal/hr
EU21	Kohler emergency generator set - Model 40REOZJC John Deere engine - Model 4024HF285B Serial #SGM32DG5J	2015	0.47 MMBtu/hr (80 bhp; 60 kW) ULSD – equivalent to 3.4 gal/hr

III. Pollution Control Equipment Identification

The air pollution control equipment listed in Table 3 shall be operated at all times that the associated devices are operating except as permitted in Table 5.

Table 3 - Pollution Control Equipment Identification

Pollution Control Equipment ID	Description	Purpose	Emission Units Controlled
PCE01	Regenerative Thermal Oxidizer Air Clear Model: THERMGEN 3 Canister RTO Serial Number: 64504J5 2 burners – 8.8 MMBtu/hr each; firing natural gas	Control of PFAS and precursors	EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26

IV. Stack Criteria

The following devices at the Facility shall have exhaust stacks that meet the criteria in Table 4:

Table 4 - Stack Criteria

Stack Number ²	Emission Unit or Pollution Control Equipment ID	Stack Configuration	Minimum Height (feet above ground surface)	Maximum Exit Diameter (feet)
3	PCE01 – Main Stack	Vertical	60	6
6	EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26 (Bypass Stack)	Horizontal	63.52	5
2, 7 and 8	EU17	Horizontal – 3 identical exhaust points	3	6.25 ft ² (30"x30")

¹ The hourly fuel rates presented in Table 2 are set assuming a heating value of 137,000 Btu/gal for ultra-low sulfur diesel (ULSD). The fuel consumption and maximum power ratings for each engine come from their respective engine specification sheets which also state that both engines are US EPA Tier 3 certified.

² As denoted in the NHDES ARD Stationary Source Database.

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V. Operating and Emission Limitations

The owner or operator shall be subject to the operating and emission limitations identified in Table 5:

Table 5 - Operating and Emission Limitations			
Item #	Requirement	Applicable Emission Unit(s)	Regulatory Basis
1.	<p>Facility-Wide Emission Limitations³</p> <p>a. Facility-wide emissions of VOCs shall be limited to less than 50 tpy; and</p> <p>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.</p>	Facility Wide	Temporary Permit TP-0256
2.	<p>24-hour and Annual Ambient Air Limit</p> <p>The emissions of any RTAP shall not cause an exceedance of its associated 24-hour or annual AAL as set forth in Env-A 1450.01, <i>Table of All Regulated Toxic Air Pollutants</i>.</p>	Facility Wide	Env-A 1400 (State-only Enforceable Limit)
3.	<p>Revisions of the List of RTAPs</p> <p>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.</p>	Facility Wide	Env-A 1405.04 (State-only Enforceable Limit)
4.	<p>NSPS General Provisions</p> <p>a. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on available information which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source;</p> <p>b. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.</p>	EU01 – EU05, EU12, EU13, EU15 and EU16	40 CFR 60.11(d) and 40 CFR 60.11(g)

³ The Facility has the potential to emit VOCs at levels greater than the major source threshold for these pollutants of 50 tpy and HAPs at levels greater than the major source threshold of 10 tpy for any individual HAP and 25 tpy for all HAPs combined. The annual emission limits in Table 5, 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 NO_x, SO₂, CO and PM₁₀ at levels greater than the major source thresholds for these pollutants. Therefore, the Facility is a true minor source for NO_x, SO₂, CO, and PM₁₀.

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Table 5 - Operating and Emission Limitations

Item #	Requirement	Applicable Emission Unit(s)	Regulatory Basis
5.	<p><i>RSA 125-C:10-e Requirements for Air Emissions of Per and Polyfluoroalkyl Substances Impacting Soil and Water</i></p> <p>The owner or operator shall operate a three-chamber regenerative thermal oxidizer (PCE01) for the control of PFAS and precursors⁴ from EU01-EU08, EU12, EU13, EU15, EU16 and EU22-EU26 in accordance with the following:</p> <ol style="list-style-type: none"> a. Except as provided in (b.), the RTO shall operate at all times the coating towers or auxiliary equipment are operating. b. The RTO may shut down and exhaust the emissions from the coating towers and auxiliary equipment through Stack #6 (Bypass Stack) for up to 175 hours per calendar year and only during the following three (3) modes of operation of the RTO: “Burner Off”, “Emergency Shutdown” and “High Inlet Temperature Shutdown”. c. The RTO shall be operated in accordance with the <i>Saint-Gobain Air Pollution Control Equipment Monitoring Plan</i> (PL-EHS-003) as updated in accordance with Table 8, Item 8. d. The placement of dampers, natural draft openings and fan set points for EU01 – EU08, EU12, EU13, EU15, EU16, and EU22 shall be in accordance with the <i>Capture Efficiency Verification Plans</i> (G-EHS-004 to G-EHS-015) as updated in accordance with Table 8, Item 8. e. Except as provided in (b.), at all times the coating towers or auxiliary equipment are operating, the active combustion chamber of the RTO shall be maintained at a minimum temperature of 1832°F (1000°C), based on an hourly block average as required in Table 6, Item 8; f. The combustion chambers of the RTO shall have a minimum gas residence time of 1 second each. g. The inlet process gas airflow rate to the RTO shall not exceed 70,000 scfm. h. The maximum annual PFAS emission limits from the Main Stack #3 and Bypass Stack #6 combined shall be less than or equal to 0.69 lbs per calendar year for PFOA, 0.90 lbs per calendar year for PFOS, 0.98 lbs per calendar year for PFNA and 0.75 lbs per calendar year for PFHxS. 	<p>PCE01 EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26</p>	<p>RSA 125-C:10-e</p>

⁴ RSA 125-C:10-e l(d) defines PFAS as per and polyfluoroalkyl substances. RSA 125-C:10-e l(e) defines precursor as any substance that has been shown by sound science to be transformed into a PFAS under ambient conditions reasonably expected to occur in New Hampshire. RSA 125-C:10-e applies to devices that have caused or contributed to an exceedance of an AGQS or SWQS as a result of the deposition of any such PFAS or precursors from the air.

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Table 5 - Operating and Emission Limitations

Item #	Requirement	Applicable Emission Unit(s)	Regulatory Basis												
6.	<p>Work Practice Standards for Cleaning Materials Used in Coating of Paper, Fabric, Film and Foil Substrates</p> <p>A paper, fabric, film, or foil coating operation that uses VOC-containing cleaning material shall control VOC emissions from the cleaning materials using the following work practices:</p> <ul style="list-style-type: none"> a. Storing VOC-containing cleaning materials in closed containers; b. Keeping mixing and storage containers closed at all times except when depositing or removing VOC-containing materials; c. Minimizing spills of VOC-containing cleaning materials; d. Conveying VOC-containing cleaning materials from one location to another in closed containers or pipes; and e. Minimizing VOC emissions from the cleaning of storage, mixing, and conveying equipment. 	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24	Env-A 1207.02												
7.	<p>Emission Rate Limits for Coating of Paper, Fabric, Film and Foil Substrates</p> <p>A paper, fabric, film, or foil coating operation that has TPE of VOCs equal to or greater than 25 tons per consecutive 12-month period, as applied, shall be limited at all times to the following emission rates as applied:</p> <table border="1" data-bbox="266 978 987 1201"> <thead> <tr> <th colspan="3" data-bbox="266 978 987 1010">Paper, Film and Foil Surface Coating</th> </tr> <tr> <th colspan="3" data-bbox="266 1010 987 1041">(not including pressure sensitive tape and label coating)</th> </tr> </thead> <tbody> <tr> <td data-bbox="266 1041 363 1125">a.</td> <td data-bbox="363 1041 760 1125">kg VOC/kg solids [ER] (lb VOC/lb solids)</td> <td data-bbox="760 1041 987 1125">0.40 (0.40)</td> </tr> <tr> <td data-bbox="266 1125 363 1201">b.</td> <td data-bbox="363 1125 760 1201">kg VOC/kg coating [ER] (lb VOC/lb coating)</td> <td data-bbox="760 1125 987 1201">0.08 (0.08)</td> </tr> </tbody> </table>	Paper, Film and Foil Surface Coating			(not including pressure sensitive tape and label coating)			a.	kg VOC/kg solids [ER] (lb VOC/lb solids)	0.40 (0.40)	b.	kg VOC/kg coating [ER] (lb VOC/lb coating)	0.08 (0.08)	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24	Env-A 1207.03(c)
Paper, Film and Foil Surface Coating															
(not including pressure sensitive tape and label coating)															
a.	kg VOC/kg solids [ER] (lb VOC/lb solids)	0.40 (0.40)													
b.	kg VOC/kg coating [ER] (lb VOC/lb coating)	0.08 (0.08)													
8.	<p>Determination of Emissions</p> <p>For a coating source that uses a bubble to achieve compliance, the emission rate (E_R) shall be determined on a daily basis using the procedures specified in Table 6, Items 4 through 7.</p>	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24	Env-A 1205												
9.	<p>Visible Emission Standards⁵</p> <ul style="list-style-type: none"> a. The owner or operator shall not cause or allow visible emissions from any stationary source or device subject to Env-A 2100 to exceed an average of 20 percent opacity for any continuous 6-minute period. b. The owner or operator shall not cause or allow visible emissions from fuel burning devices installed after May 13, 1970, to exceed an average of 20 percent for any continuous 6-minute period. 	EU01 – EU08, EU12, EU13, EU15-EU17 and EU22 – EU26	Env-A 2103.02												
		EU20, EU21 and PCE01	Env-A 2002.02												
10.	<p>Particulate Emission Standards for Fuel Burning Devices Installed on or After January 1, 1985</p> <p>The particulate matter emissions from fuel burning devices installed on or after January 1, 1985 shall not exceed 0.30 lb/MMBtu.</p>	EU20, EU21 and PCE01	Env-A 2003.03												

⁵ Compliance with visible emission limitations shall be determined using 40 CFR 60, Appendix A, Method 9, or department approved method, upon request by the department.

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Table 5 - Operating and Emission Limitations

Item #	Requirement	Applicable Emission Unit(s)	Regulatory Basis
11.	<p>Maximum Sulfur Content Allowable in Liquid Fuels The sulfur content of diesel fuel burned in the emergency engines (EU20 and EU21) shall not exceed 15 ppm (0.0015 percent sulfur by weight).</p>	EU20 and EU21	40 CFR 60.4207 (Subpart IIII)
12.	<p>Engine Operating Requirements – Emergency Engine and Fire Pump Engine The owner or operator of the emergency engine shall:</p> <ol style="list-style-type: none"> Purchase a certified emergency engine in accordance with the requirements listed in 40 CFR Part 60, Subpart IIII; Install, configure, operate and maintain the engine according to the manufacturer’s emission-related written instructions or change only the emission-related settings in a way that is permitted by the manufacturer; and Operate and maintain the engine to meet the emission standards over the entire life of the engine. 	EU20 and EU21	40 CFR 60.4206 40 CFR 60.4211(a) and 40 CFR 60.4211(c) (Subpart IIII)
13.	<p>Operating Hours Limitation – Emergency Engine and Fire Pump Engine Each emergency engine shall be limited to 500 hours of total operation per any consecutive 12-month period and only under the operating scenarios listed in Table 5, Item 14.</p>	EU20 and EU21	Temporary Permit TP-0256
14.	<p>Emergency Engines – Emergency Engine and Fire Pump Engine Each emergency engine shall only operate:</p> <ol style="list-style-type: none"> As a mechanical or electrical power source during an emergency which is defined in Env-A 1302.17 as an unforeseeable condition that is beyond the control of the owner or operator that; <ol style="list-style-type: none"> Results in an interruption of electrical power from the electricity supplier to the premises; Requires an interruption of electrical power from the electricity supplier to the premises in order to enable the owner or operator to repair damage from fire, flood, or any other catastrophic event, natural or man-made; Requires operation of an emergency engine to minimize damage from fire, flood, or any other catastrophic event, natural or man-made; or During scheduled maintenance checks and readiness testing, as recommended by federal, state or local government, the manufacturer, the vendor or the insurance company associated with the engine, for a maximum of 100 hours per calendar year.⁶ The term does not include an engine for which the owner or operator of such engine is party to any other agreement to sell electrical power from such engine to an electricity supplier, or otherwise receives any reduction in the cost of electrical power for agreeing to produce power during periods of reduced voltage or reduced power availability. 	EU20 and EU21	Env-A 103.11 Env-A 1302.17 And 40 CFR 60.4211(f) (Subpart IIII)

⁶ The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency engine beyond 100 hours per calendar year.

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VI. Monitoring and Testing Requirements

The owner or operator is subject to the monitoring and testing requirements as contained in Table 6:

Table 6 - 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.	Sulfur Content of Liquid Fuels Conduct testing in accordance with appropriate ASTM test methods or retain documentation in accordance with Table 7, Item 4 in order to demonstrate compliance with the sulfur content limitation provisions specified in this permit for liquid fuels.	For each delivery of fuel oil/diesel to the facility	Facility Wide	Env-A 806.02 and Env-A 806.05
3.	VOC Content of a Coating a. VOC coating information based upon supplier or stationary source formulation data shall be prima facie evidence of the actual VOC content of the coating; or b. Use one of the following methods, as applicable, to determine VOC content for coatings: 1. Method 24 as described in 40 CFR 60, Appendix A, using the 60-minute bake time procedure for test ASTM D 2360-01; or 2. Method 24A as described in 40 CFR 60, Appendix A. c. Record all information in accordance with Table 7, Item 6.	Maintain on a continuous basis	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24	Env-A 804.03 and Env-A 804.04
4.	Calculation of VOC Content of a Coating Formulation For a coating that contains more than one VOC component, calculate the VOC content of the coating using the following formula, provided no chemical reaction occurs during the formulation process: $P = \frac{\sum_{i=1}^n (V_i \times C_i)}{V_t}$ Where: P = The VOC content of the coating formulation, as applied, used on a coating line or operation in units of lb VOC/gal coating, minus water and exempt VOC compounds; n = The number of different coatings or diluents, as applied, used in the coating formulation; i = The subscript denoting an individual coating or diluent; V _i = The volume of the coating or diluent, i, as applied, used in the coating formulation in units of gallons, minus water and exempt VOC compounds; C _i = The VOC content of the coating or diluent, i, as applied, used in the coating formulation in units of lb VOC/gal coating less water and exempt VOC compounds, as determined from the Method 24 or 24A analysis and the calculation procedures in Section 2.2 of EPA-304/1-86-016, <i>A Guideline for Surface Coating Calculations</i> , July, 1986; and	Maintain up-to-date data	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24	Env-A 804.05

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	<p>V_t = The total volume of the coating formulation, as applied, in units of gallons minus water and exempt VOC compounds.</p>			
<p>5.</p>	<p>Calculation of Daily-weighted Average for a Coating Line Using Multiple Coatings Calculate the daily-weighted average VOC content of each coating line or operation using the following formula:</p> $P_w = \frac{\sum_{i=1}^n (V_i \times C_i)}{V_t}$ <p>Where: P_w = The daily-weighted average VOC content of the coatings, as applied, used on a coating line or operation in units of lb VOC/gal coating, minus water and exempt VOC compounds; n = The number of different coatings or diluents, as applied, used each day on the coating line or operation; i = The subscript denoting an individual coating or diluent; V_i = The volume of the coating or diluent, i, as applied, used each day on a coating line or operation in units of gallons, minus water and exempt VOC compounds; C_i = The VOC content of the coating or diluent, i, as applied, used each day on a coating line or operation in units of lb VOC/gal coating less water and exempt VOC compounds, as determined from the Method 24 or 24A analysis and the calculation procedures in Section 2.2 of EPA-304/1-86-016, <i>A Guideline for Surface Coating Calculations</i>, July, 1986. For multiple component coatings, $C_i = P$ as calculated in Table 6, Item 4; and V_t = The total volume of all coatings, as applied, used each day on a coating line or operation in units of gallons minus water and exempt VOC compounds.</p>	<p>Maintain up-to-date data</p>	<p>EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24</p>	<p>Env-A 804.06</p>
<p>6.</p>	<p>Calculation of Daily-weighted Average Coating Density (ρ_w) for a Coating Line Using Multiple Coatings Calculate the daily-weighted average coating density of each coating line or operation using the following formula:</p> $\rho_w = \frac{\sum_{i=1}^n (V_i \times \rho_i)}{V_t}$ <p>Where: ρ_w = The daily-weighted average density of the coatings, as applied, used on a coating line or operation in units of lb/gal coating; n = The number of different coatings or diluents, as applied, used each day on the coating line or operation; i = The subscript denoting an individual coating or diluent; V_i = The volume of the coating or diluent, i, as applied, used each day on a coating line or operation in units of gallons; ρ_i = The density of the coating or diluent, i, as applied, used each day on a coating line or operation in units of lb/gal coating; and</p>	<p>Maintain up-to-date data</p>	<p>EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24</p>	<p>Env-A 804.06</p>

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	<p>V_t = The total volume of all coatings, as applied, used each day on a coating line or operation in units of gallons minus water and exempt VOC compounds.</p>			
<p>7.</p>	<p>Calculation of Daily-weighted Average Emission Rate (E_R) for a Coating Line Using Multiple Coatings without Add-on Control</p> <p>The owner or operator may choose to demonstrate compliance with the emission limitations specified in Table 5, Item 7. by calculating the daily weighted average E_R as follows:</p> $E_R = \frac{P_w}{\rho_w}$ <p>Where: E_R = The daily-weighted average VOC emission rate, as applied, used on a coating line or operation in units of lb VOC/lb coating; P_w = The daily-weighted average VOC content of the coatings, as applied, used on a coating line or operation in units of lb VOC/gal coating, minus water and exempt VOC compounds as calculated in Table 6, Item 5; and ρ_w = The daily-weighted average density of the coatings, as applied, used on a coating line or operation in units of lb/gal coating as calculated in Table 6, Item 6.</p>	<p>Maintain up-to-date data</p>	<p>EU01 – EU08, EU12, EU13, EU15 – EU17 and EU24</p>	<p>Env-A 804.06</p>
<p>8.</p>	<p>Monitoring of RTO Operating Parameters The RTO shall be monitored in accordance with the <i>Saint-Gobain Air Pollution Control Equipment Monitoring Plan</i> (PL-EHS-003) as updated in accordance with Table 8, Item 8.</p> <p>Monitoring RTO Temperature</p> <p>a. The owner or operator shall monitor the RTO combustion chamber temperature using the 7 thermocouples (TE303, TE306, TE309, TE312A, TE312B, TE313A, TE313B). RTO combustion chamber temperature shall be determined by using an average of the 7 thermocouple readings. The owner or operator shall calculate and record the RTO combustion chamber temperature in 1-minute temperature intervals and hourly block averages.</p> <p>Monitoring Low Temperature Events</p> <p>b. If the hourly block average RTO combustion chamber temperature is less than the minimum specified in Table 5, Item 5, then the owner or operator shall investigate and take corrective action immediately upon discovery of the permit deviation to restore the air pollution control equipment (PCE01) to within allowable permit conditions.</p> <p>c. If the hourly block average RTO combustion chamber temperature is less than the minimum specified in Table 5, Item 5, then the owner or operator shall keep records pursuant to Table 7, Item 8.</p>	<p>As noted</p> <p>Monitor every minute Calculate 1-minute and hourly block averages when the associated processes are operating</p> <p>As noted</p>	<p>PCE01, EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26</p>	<p>RSA 125-C:6, XI, Env-A 906, and Env-A 911.03(b)</p>

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	<p>d. If the hourly block average RTO combustion chamber temperature cannot be brought back up above the minimum specified in Table 5, Item 5 and occurs for 3 consecutive 1-hour blocks or more, then the owner or operator shall report the low temperature event pursuant to Table 8 Item 10.</p> <p>Monitoring RTO Inlet Process Gas Airflow and RTO Natural Gas Flow</p> <p>e. The owner or operator shall monitor the RTO inlet process gas airflow every minute (in scfm). The owner or operator shall calculate and record the hourly block average RTO inlet process gas airflow.</p> <p>f. The owner or operator shall monitor the RTO natural gas flow every minute (in scfm). The owner or operator shall calculate and record the hourly block average RTO natural gas flow.</p> <p>Monitoring PCE01 Bypass Events</p> <p>g. If any emissions from the coating towers and auxiliary equipment are diverted through Stack #6 (Bypass Stack), then the owner or operator shall investigate and take corrective action immediately upon discovery of the bypass event to minimize the time in which the air pollution control equipment (PCE01) is in bypass.</p> <p>h. If a bypass event occurs, then the owner or operator shall keep records pursuant to Table 7, Item 8.</p> <p>i. If a bypass event lasts more than 1 hour, then the owner or operator shall report the bypass event pursuant to Table 8, Item 10.</p>	<p>Monitor every minute Calculate hourly block averages when the associated processes are operating</p> <p>As noted</p>		
9.	<p>RTO Maintenance</p> <p>a. The RTO shall be maintained in accordance with the <i>Saint-Gobain Air Pollution Control Equipment Monitoring Plan</i> (PL-EHS-003) as updated in accordance with Table 8, Item 8.</p> <p>b. The ductwork from each source as well as the header leading to the RTO shall be maintained in accordance with the <i>Fire Response and Prevention Plan</i> (PL-EHS-001) as updated in accordance with Table 8, Items 8.</p> <p>c. The maintenance items shall be conducted by plant personnel familiar with the operation of the RTO and associated equipment.</p>	As documented in the Plans	PCE01 EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26	RSA 125-C:6, XI and Env-A 810
10.	<p>Bypass Stack Damper Monitoring Requirement</p> <p>Visually inspect the bypass stack damper seal or closure mechanism at least once every quarter to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass stack.</p>	Quarterly	PCE01	RSA 125-C:10-e
11.	<p>Capture Efficiency Verification Requirements</p> <p>a. In order to ensure average facial velocity into natural draft openings is at least negative 0.007 inches of water, each applicable emission unit shall be monitored</p>	As documented in the Plan	EU01 – EU08, EU12, EU13, EU15, EU16, and EU22	RSA 125-C:10-e

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	<p>in a manner and a frequency as outlined in the <i>Capture Efficiency Verification Plans</i> (G-EHS-004 to G-EHS-015) as updated in accordance with Table 8, Item 8.</p>			
	<p>b. The owner or operator shall conduct USEPA Method 204 capture efficiency testing annually but no more than 13 months after previous test in accordance with Table 6, Items 13 and 14 as applicable to evaluate the placement of dampers, natural draft openings, and fan set points of the applicable towers to confirm that they are operating at least negative 0.007 inches of water and update the <i>Capture Efficiency Verification Plans</i> (G-EHS-004 to G-EHS-015) accordingly.</p>	<p>Annually but no more than 13 months after previous test and within 60 days of any physical change to the control system that meets the criteria in Env-A 805.09(b)</p>		
	<p>c. In lieu of conducting annual capture efficiency testing required in (b) above, the owner or operator shall:</p> <ol style="list-style-type: none"> 1. Install, operate, and maintain gauges to monitor the static pressure of each opening on each emission unit (EU01 – EU06, EU12, EU13, EU15, EU16 and EU24) to assure that each emission unit is operated under negative pressure for the capture of PFAS emissions. 2. Install, operate, and maintain gauges on the 20" coater and 20" caster room (EU07 and EU08) and the R&D room (EU22) to assure that the rooms are maintained as a permanent total enclosure for the capture of PFAS emissions. 3. The static pressure of each emission unit or room shall be less than or equal to negative 0.007 inches of water to demonstrate compliance with the requirements of (c)(1) and (c)(2) above. 	<p>At all times the applicable emission units are operating</p>		
	<ol style="list-style-type: none"> 4. Monitor and record the static pressure readings at each location. 	<p>Four times per day on days when the applicable emission units are operating</p>		
	<ol style="list-style-type: none"> 5. If the static pressure readings of any emission unit or room are greater than the maximum listed in Table 6, Item 11(c)(3) above, then the owner or operator shall investigate and take corrective action immediately upon discovery to minimize the release of fugitive emissions. 6. If the static pressure readings of any emission unit or room are greater than the maximum listed in Table 6, Item 11 (c)(3) above, then the owner or operator shall keep records of the length of time and corrective action taken for the event. 	<p>For each event</p>		

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	7. Maintain and calibrate the pressure differential gauges. Record maintenance and calibration records in accordance with manufacturer's specifications.	In accordance with manufacturer's specifications		
	8. If the owner or operator installs the gauges identified in Table 6, Item 11(c) above, the owner or operator shall update the <i>Capture Efficiency Verification Plans</i> (G-EHS-004 to G-EHS-015) in accordance with Table 8, Item 8 to reflect installation and operation of gauges, monitoring, recordkeeping, and reporting requirements.	Within 30 days of installation of gauges		
	9. Conduct USEPA Method 204 capture efficiency testing concurrent with the performance testing required in Table 6, Item 15.	Concurrent with performance test frequency required in Table 6, Item 16		
12.	<p>Start-up and Shutdown Requirements</p> <p>a. The start-up and shutdown of PCE01 and associated process devices (EU01-EU08, EU12, EU13, EU15, EU16 and EU22-EU26) shall be in accordance with the <i>Saint-Gobain Air Pollution Control Equipment Monitoring Plan</i> (PL-EHS-003) as updated in accordance with Table 8, Item 8.</p> <p>b. When PCE01 is warming up to temperature or offline, the owner or operator shall not initiate a new run sequence of any process device prior to PCE01 reaching the established operational temperature required in Table 5, Item 5.</p> <p>c. During any shutdown condition, process operations will proceed to a safe stopping point to minimize potential emissions.</p> <p>d. In the event of an unplanned RTO shutdown:</p> <ol style="list-style-type: none"> 1. All process devices that are currently running will continue to run until the roll length is finished in order to achieve a safe stop. 2. Any process devices that were not running prior to the RTO shutting down cannot be started until PCE01 reaches the established operational temperature required in Table 5, Item 5. 3. Once a process device is stopped whether manually or the roll length runs out, it cannot be restarted until PCE01 reaches the established operational temperature required in Table 5, Item 5. 	Continuous	PCE01 EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26	RSA 125-C:10-e Env-A 810.01 and Env-A 910.01

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
13.	<p>Performance Test Notifications and Reports Compliance testing shall be planned and carried out in accordance with the following:</p> <ul style="list-style-type: none"> a. At least 30 days prior to the commencement of source testing, the owner or operator shall notify the department of the date(s) of any planned compliance stack testing. b. At least 30 days prior to the commencement of source testing, the owner or operator shall submit to the department a pre-test protocol which contains all the information specified in Env-A 802.04. c. At least 15 days prior to the test date, the owner or operator and any contractor retained by the owner or operator to conduct the test shall meet with a department representative in person or over the telephone to finalize the details of the testing as outlined in Env-A 802.05. d. A pre-test meeting may be held less than 15 days prior to the test so long as the department staff are available and implementation of any testing or operation changes resulting from the meeting can be carried out prior to scheduled test date and scheduled test integrity is not jeopardized. e. The owner or operator shall notify the department by telephone, fax, or electronic mail prior to any proposed changes in the testing schedule for a compliance stack test. f. The owner or operator shall obtain prior approval from the department, which shall be based on staff availability, of any new date for a compliance stack test. g. The owner or operator shall submit a report to the department that contains all the information specified in Env-A 802.11 no more than 60 days after the completion of testing. 	30 days prior to performance testing or as specified	PCE01	RSA 125-C:10-e and Env-A 802
14.	<p>Performance Test Requirements</p> <ul style="list-style-type: none"> a. Each performance test shall conform to the following: <ul style="list-style-type: none"> 1. The general requirements of 40 CFR §60.8; and 2. The test methods contained in 40 CFR 60, Appendix A, 40 CFR 51, Appendix M, or any other stack test method promulgated by the USEPA, or any alternative, conditional or other test method approved by the USEPA, or any alternative method approved by the department in accordance with Env-A 809. b. An owner or operator shall sample emissions at locations and sampling points that will provide representative measurements of the actual emissions during source operation at the time of the test. c. Prior to each compliance stack test that includes a measurement of stack volumetric flow rate, the owner or operator shall perform a verification of the absence 	For each performance test	PCE01	RSA 125-C:10-e and Env-A 802

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	<p>of cyclonic flow following the method and acceptance criteria specified in 40 CFR 60, Appendix A, Method 1.</p> <ul style="list-style-type: none"> d. The owner or operator shall provide calibration data for any sampling equipment used during the compliance stack test to the department upon request during the day of testing. e. The owner or operator shall provide copies of all calibration and field test data taken during the testing, including failed runs, to the department upon request. f. The department shall approve deviations from the agreed-upon test method or pre-test protocol only if the following criteria are met: <ul style="list-style-type: none"> 1. The owner or operator informs department personnel assigned to the stack test of the following: <ul style="list-style-type: none"> i. The deviation from the testing method or planned operational mode of the source; ii. The reason(s) for the deviation; and iii. The implications of such a deviation; 2. The owner or operator provides technical justification showing that allowance of such deviation will not affect the accuracy of the compliance stack emissions test; g. Compliance testing shall be conducted under one of the following operating conditions: <ul style="list-style-type: none"> 1. Between 90 and 100%, inclusive, of maximum production rate or rated capacity; 2. A production rate at which maximum emissions occur; or 3. At such operating conditions agreed upon during a pre-test meeting conducted pursuant to Table 6, Item 13. 			
15.	<p>Periodic RTO Performance Test Requirements</p> <ul style="list-style-type: none"> a. The owner or operator shall conduct a periodic performance test in accordance with Table 6, Items 13 and 14 to evaluate pre- and post-RTO emissions of PFAS analytes to determine compliance with Table 5, Item 5. b. The following test methods, or department approved alternatives, shall be used, as applicable: <ul style="list-style-type: none"> 1. USEPA Methods 1-4 for exit flow rate, percentage of carbon dioxide, oxygen, and moisture. 2. For PFAS testing, the testing shall consist of three separate sampling runs using USEPA Method OTM-45 and analyzing for all PFAS analytes listed in the method and/or any additional EPA-approved methods as required by the department⁷. 	Annually no more than 13 months after previous test for a minimum of 2 consecutive performance tests conducted during this permit term or no more than 37 months after previous test if using criteria in	PCE01	RSA 125-C:10-e

⁷ Stack test samples shall be analyzed for the complete list of PFAS analytes identified in the stack test method(s). If additional performance test methods have been proposed by EPA at the time of the required periodic performance testing in Table 6, Item 15, then NHDES may require utilization of these additional test methods as appropriate.

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Table 6 - Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis
	<p>c. The following process information shall be collected for each periodic performance test:</p> <ol style="list-style-type: none"> 1. Dip pan samples of formulated dispersions shall be taken during each performance test run and analyzed for PFAS analytes as listed in the method.⁸ 2. Process information as agreed upon in the pre-test protocol required in Table 6, Item 13. 	Table 6, Item 16		
16.	<p>Performance Test Frequency Reduction</p> <ol style="list-style-type: none"> a. If emissions for all PFAS analytes are at or below 75% of the emission limits specified in Table 5, Item 5 for at least 2 consecutive performance tests conducted during this permit term and there are no process changes that may increase emissions, the performance test frequency requirement of Table 6, Item 15 may be reduced to no more than 37 months after the previous test. b. The performance test frequency shall return to annual testing if any performance test results show emissions of any PFAS analyte exceeds 75% of the emission limits specified in Table 5, Item 5. Annual performance testing must be conducted until at least 2 consecutive performance tests show compliance with Table 6, Item 16 (a). 	As specified	PCE01	RSA 125-C:10-e
17.	<p>Emergency Engine Hours of Operation</p> <p>Each emergency engine shall be equipped with a non-resettable hour meter.</p>	Continuous	EU20 and EU21	40 CFR 60.4209 (Subpart IIII)
18.	<p>Capture Efficiency Verification Requirements (EU24 Modification)</p> <ol style="list-style-type: none"> a. The owner or operator shall conduct USEPA Method 204 capture efficiency testing of EU24 during the next stack test required in Table 6, Item 15 in accordance with Table 6, Items 13 and 14 as applicable to evaluate the placement of dampers, natural draft openings, and fan set points of the tower. b. The owner or operator shall submit a <i>Capture Efficiency Verification Plan</i> for EU24 with the stack test report required in Table 6, Item 13(g). c. If the owner or operator installs the gauges identified in Table 6, Item 11(c), the owner or operator shall update the <i>Capture Efficiency Verification Plan</i> required in Table 6, Item 18(b) above in accordance with Table 8, Item 8 to reflect installation and operation of gauges, monitoring, recordkeeping and reporting requirements. 	<p>No more than 13 months after previous test</p> <p>No more than 60 days after the completion of testing</p> <p>Within 30 days of installation of gauges</p>	EU24	RSA 125-C:10-e

⁸ Historically, these samples were analyzed using Method 537.1 (modified) for 24 PFAS analytes. As of the date of this permit's issuance, an EPA certified method for this medium has not been developed.

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VII. Recordkeeping Requirements

The owner or operator shall be subject to the recordkeeping requirements identified in Table 7:

Table 7 - Recordkeeping Requirements				
Item #	Requirement	Duration/Frequency	Applicable Unit	Regulatory Basis
1.	Record Retention and Availability 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.	General Recordkeeping Requirements for Process Operations 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;	Monthly	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU22 – EU26	Env-A 903.02 and Env-A 906
	c. Safety Data Sheets (SDSs) or other documentation containing the concentration of total VOCs, each HAP and RTAP in each raw material used; and d. Results of dip pan samples of formulated dispersions taken in accordance with Table 6, Item 14 containing the concentration of PFAS.	As specified		
3.	General Recordkeeping Requirements for Combustion Devices Maintain the following records of fuel characteristics and utilization for the fuel used in the combustion devices: a. Type (e.g., diesel fuel) and amount of fuel burned in each device; or b. Type and amount of fuel burned in multiple devices and hours of operation of each device to be used to apportion fuel use between the multiple devices. c. Hours of operation for each emergency engine; and d. Documentation that the fuel meets the sulfur limits.	Monthly	EU20 and EU21	Env-A 903.03
4.	Liquid Fuel Oil Recordkeeping Requirements In lieu of sulfur testing pursuant to Table 6, Item 2, the owner or operator may maintain fuel delivery tickets that contain a written statement from the fuel supplier that the sulfur content of the fuel as delivered does not exceed state or federal standards for that fuel.	Whenever there is a change in fuel supplier but at least annually	EU20 and EU21	Env-A 806.05
5.	VOC Emission Statements Recordkeeping Requirements 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: 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 each VOC-emitting processes or devices identified in (a.) above, including: 1. Actual monthly VOC emissions, in tons; 2. Typical high ozone season day VOC emissions, in pounds per day; and 3. The emission factors and the origin of the emission	Maintain Data for Annual Report	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU20 – EU22	Env-A 904

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Table 7 - Recordkeeping Requirements

Item #	Requirement	Duration/ Frequency	Applicable Unit	Regulatory Basis
	factors used to calculate the VOC emissions.			
6.	<p>VOC Recordkeeping for Surface Coating and Printing Operations Record the following information for each coating operation subject to Env-A 1200:</p> <ul style="list-style-type: none"> a. Coating formulation and analytical data, as follows: <ul style="list-style-type: none"> 1. Supplier; 2. Name and color; 3. Type; 4. Identification number; 5. Density described as lbs/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 volume percent; 10. Solids content described as volume percent; 11. Diluent name and identification number; 12. Diluent solvent density described in lbs/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 ratio described as gal diluent solvent per gal coating. b. The number of gallons of each coating, including solvents and diluents, utilized during a typical high ozone season day; and c. Process information for a typical high ozone season day, including: <ul style="list-style-type: none"> 1. Method of application; 2. Number of coats; 3. Drying method; and 4. Substrate type and form. 	Maintain Current Data	EU01 – EU08, EU12, EU13 and EU15 – EU17	Env-A 904.03
7.	<p>Recordkeeping for VOC RACT Compliance Maintain the following records in order to show compliance with the VOC RACT limits stated in Table 5, Item 7:</p> <ul style="list-style-type: none"> a. If all compliant coatings are used on a given day, then records of VOC coating content shall be maintained pursuant to Table 6, Items 3 and 4, and Table 7, Item 6. These records shall be used to show compliance with the coating limits in Table 5, Item 7. b. If a bubble is used to average coating VOC contents, then maintain records of the calculations conducted pursuant to Table 6, Items 5, 6, and 7. The result of the bubble calculation shall be less than the limit contained in Table 5, Item 7. 	Daily	EU01 – EU08, EU12, EU13 and EU15 – EU17	Env-A 906
8.	<p>Recordkeeping Requirements: Air Pollution Control Equipment Maintain records of all air pollution control equipment activities required in Tables 5 and 6 as well as the records listed in the <i>Saint-Gobain Air Pollution Control Equipment Monitoring Plan</i> (PL-EHS-003), the <i>Capture Efficiency Verification Plans</i> (G-EHS-004</p>	Maintain Current Data	PCE01 EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 –	Env-A 906 and RSA 125-C:10-e

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Table 7 - Recordkeeping Requirements

Item #	Requirement	Duration/ Frequency	Applicable Unit	Regulatory Basis
	<p>to G-EHS-015) or the <i>Fire Response and Prevention Plan</i> (PL-EHS-001) as updated in accordance with Table 8, Item 8., including:</p> <ul style="list-style-type: none"> a. The hourly block average RTO combustion chamber temperature in degrees F, hourly block average inlet process gas flowrate in scfm, and hourly block average RTO natural gas flowrate in scfm in accordance with Table 6, Item 8; b. Air pollution control equipment maintenance activities conducted in accordance with Table 6, Items 9 and 10; c. Capture efficiency verification records in accordance with Table 6, Item 11; d. Performance test results required pursuant to Table 6; e. Records of startup and shutdown of the RTO in conjunction with appropriate operational information of the process operations to demonstrate compliance with Table 6, Item 12; and f. Records of all bypass events including the inlet process gas airflow (scfm) at the start of the bypass event, the date and time emissions began going to the atmosphere, the date and time emissions stopped going to the atmosphere, length of time spent in bypass, running total of hours per calendar year of bypass events, the emission unit(s) in operation at the time of bypass events, the mode of operation of the RTO during each bypass event, and PFOA, PFOS, PFNA and PFHxS emissions (type, amount and calculations) for each bypass event and running total emissions of PFOA, PFOS, PFNA and PFHxS for all bypass events for the calendar year; g. Date, time, duration, and probable cause of pollution control equipment monitoring parameter excursions; h. Corrective actions and preventative measures taken for all permit deviations, low temperature events and bypass events; and i. <i>Appendix A: RTO Malfunction Report</i> from the Monitoring Plan for each malfunction. 		EU26	
9.	<p>General NOx Recordkeeping Requirements</p> <p>If the actual annual NOx 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"> 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 (a.) above, including: <ul style="list-style-type: none"> 1. Typical hours of operation per day; 2. Typical days of operation per calendar month; 3. Type and amount of each fuel burned; 4. Design heat input rate in MMBtu/hr; and 5. The following NOx emission data: <ul style="list-style-type: none"> i. Actual NOx emissions per month; ii. Typical high ozone season day NOx emissions, in pounds per day; and iii. Emission factors and the origin of the emission factors used to calculate the NOx emissions. 	Maintain Data for Annual Report	EU01 – EU06, EU12, EU13, EU15, EU16, EU20 – EU22, EU24 and EU26	Env-A 905.02

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Table 7 - Recordkeeping Requirements

Item #	Requirement	Duration/Frequency	Applicable Unit	Regulatory Basis
10.	<p>Regulated Toxic Air Pollutants Maintain records documenting compliance with Env-A 1400. Compliance was demonstrated at the time of permit issuance as described in the department's Permit Application Review Summary for Applications #21-0198 and #22-0092. The source must update the compliance demonstration using one of the methods provided in Env-A 1405 if:</p> <ol style="list-style-type: none"> There is a revision to the list of RTAPs lowering the AAL or <i>de minimis</i> value for any RTAP emitted from the Facility; 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); An RTAP that was not evaluated in the Application Review Summary will be emitted (e.g., a new coating will be used); or 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)
11.	<p>Additional Recordkeeping Requirements: Facility-wide emission limitations⁹ Maintain a 12-month running total of facility-wide emissions, calculated pursuant to Env-A 705.03, of VOC and HAPs, for the purpose of demonstrating that the total emissions of these pollutants are below the major source thresholds as limited in Table 5, Item 1.</p>	Monthly	Facility Wide	Env-A 906 and Env-A 604.02(a)(3)
12.	<p>40 CFR 60 Subpart VVV – Polymeric Coating of Supporting Substrates Recordkeeping Requirements Maintain records of estimates of the projected annual amount of VOC to be used for the manufacture of polymeric coated substrates over the year and actual 12-month VOC use.</p>	Semiannual	EU01 – EU08, EU12, EU13, EU15, EU16 and EU24	40 CFR 60.744(b) and 40 CFR 60.747(c) (Subpart VVV)
13.	<p>40 CFR 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engines Recordkeeping Requirements The owner or operator shall maintain the following records:</p> <ol style="list-style-type: none"> Documentation from the engine manufacturer certifying that the engine complies with the applicable emission standards stated in 40 CFR Part 60, Subpart IIII; A copy of the manufacturer's emission-related written instructions (O&M manual) for the engine and its associated control devices; The maintenance conducted on the engine in order to demonstrate that the device was operated and maintained according to the O&M manual; The operation of the engine in emergency (i.e. loss of power) and non-emergency situations (i.e. maintenance and testing) that are recorded through the non-resettable hour meter. The owner or operator must record the time of operation of the engine and the reason the engine was in operation during that time; and 	Maintain Up-to-date Data	EU20 and EU21	40 CFR 60.4211 and 40 CFR 60.4214 (Subpart IIII)

⁹ Facility-wide VOC emissions shall include not only the contribution from the process equipment, but also the contribution from fuel burned in the process equipment burners and the emergency engines.

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Table 7 - Recordkeeping Requirements

Item #	Requirement	Duration/ Frequency	Applicable Unit	Regulatory Basis
	e. Documentation of the federal, state or local standard(s) that require the owner or operator to conduct maintenance and testing for more than 100 hours per calendar year if the owner or operator is exercising the option listed in Footnote 7.			
14.	Permit Deviation Recordkeeping 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.	As specified	EU01 – EU08, EU12, EU13, EU15 – EU17, EU20 – EU26 and PCE01	Env-A 911.03(b)

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 8 below.

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Table 8 - Reporting Requirements

Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis
1.	<p>General Reporting Requirements</p> <ul style="list-style-type: none"> a. Each report shall be separately and clearly labeled with: <ul style="list-style-type: none"> 1. The name, mailing address and physical address of the source covered by the report; 2. The operating period covered by the report; 3. The permit number and condition or item number that requires the report submittal; 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 5. The date the report was prepared; 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 Table 8, Item 1a. above, and indicate which portions of the report have been revised; 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 Table 8, Items 1a. and 1b. above, if applicable, for each report; and d. The owner or operator shall submit reports as paper documents or by electronic means. 	For each report submitted to the department	Facility Wide	Env-A 907.01

Saint-Gobain Performance Plastics Corporation

Table 8 - Reporting Requirements

Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis
2.	<p>Annual Emissions Report Submit an annual emissions report which shall include the following information:</p> <ol style="list-style-type: none"> a. Actual calendar year emissions from each coating tower (EU01-EU08, EU12, EU13, EU15 – EU17, EU22 – EU26) of: <ol style="list-style-type: none"> 1. Total VOCs; 2. Each HAP and RTAP, reported by CAS number; and 3. PFOA, PFOS, PFNA and PFHxS emissions from the RTO (Stack #3), the bypass stack (Stack #6), and combined to show compliance with Table 5, Item 5 emission limitations. b. Actual calendar year emissions from the process heaters associated with the coating towers (EU01 – EU06, EU12, EU13, EU15, EU16, EU22, EU24 and EU26) and the engines (EU20 and EU21)¹⁰ of: <ol style="list-style-type: none"> 1. NO_x; 2. Total VOCs; 3. Filterable PM; 4. CO; and 5. SO₂. 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>; d. The emission factors and the origin of the emission factors; e. All information recorded in accordance with Table 7, Items 2 and 3; and f. Total calendar year hours of operation in bypass mode. 	Annually (received by the department no later than April 15th of the following year)	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU20 – EU26	Env-A 907.02, Env-A 910 and RSA 125-C:10-e
3.	<p>VOC Emission Statements Reporting Requirements 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 7, Item 5 with the annual emission report.</p>	Annually (received by the department no later than April 15th of the following year)	EU01 – EU08, EU12, EU13, EU15 – EU17 and EU20 – EU22	Env-A 908

¹⁰ The burners in RTO (PCE01), are each rated at less than 10 MMBtu/hr burning natural gas, and a boiler located at the facility is, rated at 1.56 MMBtu/hr burning #2 fuel oil. Since these devices, are also located at the facility but because they are below permitting thresholds of Env-A 607.01 and the facility is a true minor source for SO₂, NO_x, CO, and PM, the criteria pollutant emissions from these combustion devices are not required to be included in the annual emissions reporting requirements pursuant to Env-A 907.02.

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Table 8 - Reporting Requirements

Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis
4.	<i>NOx Emission Statements Reporting Requirements</i> If the actual annual NOx emissions from all permitted devices located at the Facility are greater than or equal to 10 tpy, then include all data recorded in accordance with Table 7, Item 9 with the annual emission report.	Annually (received by the department no later than April 15th of the following year)	EU01 – EU06, EU12, EU13, EU15, EU16, EU20 – EU22, EU24 and EU26	Env-A 909
5.	<i>Update to Air Pollution Dispersion and Deposition Modeling Impact Analysis</i> If an update to the facility's air pollution dispersion or deposition modeling impact analysis is required pursuant to Env-A 606.02 (e.g., stack parameters including exhaust flow rate and temperature for PCE01 differ from stack parameters as modeled in Application #18-0227), submit the information required pursuant to Env-A 606.04: a. With the permit application submitted for the change which triggered the analysis; or b. Within 15-days of completion of the change which triggered the analysis, if a permit application is not required.	As specified	EU01 – EU08, EU12, EU13, EU15 – EU17, EU22 – EU26 and PCE01	RSA 125-C:10-e and Env-A 910.01
6.	<i>Permit Deviation Reporting Requirements</i> 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 – EU08, EU12, EU13, EU15 – EU17, EU20 – EU26 and PCE01	Env-A 911.04(a) and Env-A 911.04(d)
7.	<i>Annual Emission Fee</i> Pay annual emission fee in accordance with Condition XII.	Annually (received by department no later than May 15th of the following year)	EU01 – EU08, EU12, EU13, EU15 – EU17, EU20 – EU26 and PCE01	Env-A 705
8.	<i>Air Pollution Control Equipment Monitoring Plan</i> If the owner or operator determines that the information and procedures documented in the <i>Saint-Gobain Air Pollution Control Equipment Monitoring Plan</i> (PL-EHS-003), the <i>Capture Efficiency Verification Plans</i> (G-EHS-004 to G-EHS-015) or the <i>Fire Response and Prevention Plan</i> (PL-EHS-001) needs to be changed at any time to accurately represent the activities performed to maintain or operate the control equipment, emergency bypass stack or the associated emission units, the owner or operator shall submit a revised plan, as applicable, to the department in writing.	Submit to the department within 30 days of any change to the plan	PCE01 EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26	RSA 125-C:10-e and Env-A 810.01(e)

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Table 8 - Reporting Requirements

Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis
9.	<p>NSPS Reporting Requirements Submit to the department and U.S. EPA Region 1, a report on the first semiannual estimate in which projected annual VOC use exceeds 95 Mg and report the first 12-month period in which the actual VOC use exceeds the applicable cutoff. The address for USEPA Region 1 is: Director, Enforcement and Compliance Assurance Division U.S. EPA Region I 5 Post Office Square Suite 100 (04-2) Boston, MA 02109-3912 Attn: Air Compliance Clerk</p> <p>The address for the department is: NHDES – Air Resources Division Attn: Compliance Measurement & Data Programs Manager PO Box 95 29 Hazen Drive Concord, NH 03301-0095</p>	As required	EU01 – EU08 and EU11 – EU16	40 CFR 60.747(c) (Subpart VVV)
10.	<p>Reporting of Low Temperature and Bypass Events For low temperature events or bypass events that meet the criteria of Table 6, Item 8, the owner or operator shall notify the department within 24 hours of discovery and submit the <i>Appendix A: RTO Malfunction Report</i> from the Monitoring Plan by paper or by electronic means to the department within 10 days of discovery.</p>	As specified	PCE01 EU01 – EU08, EU12, EU13, EU15, EU16 and EU22 – EU26	RSA 125-C:10-e and Env-A 910

IX. Permit Deviation Reporting Requirements

- A. Env-A 101, 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,

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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

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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_x, SO₂, VOCs, HAPs or PM₁₀; 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 1710, 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.
 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 Condition XII.C and a baseline emission fee stated in Condition XII.D. 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 2023 shall be received on or before May 15, 2024.
- 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 Condition XII.B; 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:

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1. Env-A 705.07(a), \$5,250; or
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.

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