



TITLE V OPERATING PERMIT

Permit No: **TV-0009**
Date Issued: **May 22, 2014**

This certifies that:

Textile Tapes Corporation
104 Pickering Road
Rochester, NH 03867-4604

has been granted a Title V Operating Permit for the following facility and location:

Textile Tapes Corporation
104 Pickering Road
Rochester, NH 03867-4604

Facility ID No: **3301700039**
Application No: **09-0232**, received September 21, 2009 – Renewal of Title V Operating Permit
Application No: **12-0042**, received March 5, 2012 – Minor Modification to incorporate TP-0086 into TV permit.

This Title V Operating Permit is hereby issued under the terms and conditions specified in the Title V application referenced above filed with the New Hampshire Department of Environmental Services under the signature of the responsible official certifying to the best of his knowledge that the statements and information therein are true, accurate and complete.

This Permit is issued by the New Hampshire Department of Environmental Services, Air Resources Division pursuant to its authority under New Hampshire RSA 125-C and in accordance with the provisions of the Code of Federal Regulations, Title 40, Part 70.

This Permit is effective upon issuance and expires on **May 31, 2019**.

Craig Wright
COPY

Director, Air Resources Division

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ABBREVIATIONS

ARD	Air Resources Division
AAL	Ambient Air Limit
acf	actual cubic foot
ags	above ground surface
ASTM	American Society of Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAM	Compliance Assurance Monitoring
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
The Division	DES Air Resources Division
Env-A	New Hampshire Code of Administrative Rules – Air Resources Division
ERC	Emission Reduction Credit
ft	foot or feet
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hp	horsepower
hr	hour
kW	kilowatt
lb	pound
LPG	Liquefied Petroleum Gas
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 Matter < 10 microns
ppm	parts per million
psig	pounds per square inch gauge
QIP	Quality Improvement Plan
RACT	Reasonably Available Control Technology
RSA	Revised Statutes Annotated
RTAP	Regulated Toxic Air Pollutant
scf	standard cubic foot
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulate
tpy	tons per consecutive 12-month period
USEPA	United States Environmental Protection Agency

Facility Specific Title V Operating Permit Conditions

I. Facility Description of Operations

Textile Tapes Corporation (TTC) operates a substrate coating facility in Gonic, New Hampshire. The plant operates two coating lines, 1B and 1C, which coat woven and non-woven materials with adhesive in the production of tapes and coated products. TTC utilizes the knife coating process in the coating lines. Coating Line 1B vents its emissions from the dryer, associated with the coating line, to the recuperative thermal oxidizer (RTO). Coating Line 1C utilizes hot melt technology which coats a backing material without the heat curing step. The facility has potential VOC emissions of 63.8 tons/yr, which is above the major source threshold of 50 tons/year. As a major source of VOC emissions, it therefore requires a Title V Permit. The facility maintains HAPs below the major source thresholds of 10 tons/yr for any single HAP and 25 tons/year for 2 or more HAPs.

II. Permitted Activities

In accordance with all of the applicable requirements identified in the Permit, the Owner or Operator is authorized to operate the devices and/or processes identified in Sections III, IV, V, and VI within the terms and conditions specified in this permit.

III. Emission Unit Identification

a. Significant Activities

The activities identified in Table 1 are subject to and regulated by this Title V Operating Permit.

Table 1 - Significant Activities			
Emission Unit ID	Description of Emission Unit	Installation Date	Maximum Design Capacity
EU01	Coating Line 1B Natural Gas Dryer 1.5MMBtu/hr Recuperative Thermal Oxidizer 3.0 MMBtu/hr NG fired burner	Prior to 1979	The solvent application rate for non-compliant coatings shall not exceed 500 pounds per hour.
EU02	Coating Line 1C	1993	VOC emissions from generic release coating shall be limited to less than 5 tons/yr during any consecutive 12 month period.
EU03	Solvent Wipe Cleaning of Process Equipment	Prior to 1979	VOC emissions of less than 5 tons per year.

b. Stack Criteria –

The following devices at the Facility shall have exhaust stacks that discharge vertically, without obstruction, and meet the criteria in Table 2:

Table 2 - Stack Criteria			
Stack #	Emission Unit #	Minimum Height (feet above ground surface)	Maximum Exit Diameter (feet)
Stack 1	EU01/PCE01	35.0	2.85
Stack 2	EU02	21	0.75 x 1.1 (width x length)

IV. Insignificant Activities Identification

All activities at this facility, which meet the criteria identified in Env-A 609.04, shall be considered insignificant activities. Emissions from the insignificant activities shall be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this Permit.

V. Exempt Activities Identification

All activities identified in Env-A 609.03(c) shall be considered exempt activities and shall not be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this permit.

VI. Pollution Control Equipment Identification

Air pollution control equipment listed in Table 3 shall be operated at all times that the associated device is processing non-compliant coatings in order to meet permit conditions.

Table 3 - Pollution Control Equipment Identification			
Pollution Control Equipment ID	Description	Purpose	Emission Unit Controlled
PCE01	Regenerative Thermal Oxidizer (RTO) TANN Langbein Engelbracht America 3.0 MMBtu/hr Natural Gas fired burner Model No.: TR-1090 Installed August 2011	Control of VOCs	EU01

VII. Alternative Operating Scenarios

No alternative operating scenarios were identified for this permit.

VIII. Applicable Requirements

a. State-only Enforceable Operational and Emission Limitations

The Owner or Operator shall be subject to the state-only¹ operational and emission limitations identified in Table 4 below:

Table 4 - State-only Enforceable Operational and Emission Limitations			
Item #	Applicable Requirements	Applicable Emission Unit	Regulatory Citation
1.	<u>24-hour and Annual Ambient Air Limit²</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> .	Facility wide	Env-A 1400
2.	<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 of RSA 125-I or RSA 125-C, the Owner or Operator shall have 90 days following publication of notice of such final revision in the New Hampshire Rulemaking Register to file a complete application for such permit or permit modification.	Facility wide	RSA 125-I:5 IV

b. Federally Enforceable Operational and Emission Limitations

The Owner or Operator shall be subject to the federally enforceable operational and emission limitations identified in Table 5 below:

Table 5 - Federally Enforceable Operational and Emission Limitations			
Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Citation
1.	<u>Facility-Wide HAP Emission Limitation</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 HAPs combined ³ .	Facility Wide	Env-A 604.02(a)(1) & RACT Order ARD-96-001 Amended November 16, 2012
2.	<u>Sulfur Content Limitations for Gaseous Fuels</u> Gaseous fuels shall contain no more than 5 grains of sulfur per 100 cubic feet of gas, calculated as hydrogen sulfide at standard conditions.	Facility wide	40 CFR 52 & Env-A 402.03 (SIP Approved Rule)

¹ The term “state-only requirement” is used to refer to those requirements that are not federally enforceable but are state requirements as defined in Env-A 101.186.

² Env-A 1450.01, *Table Containing the List Naming All Regulated Toxic Air Pollutants*, is typically updated annually. The updates can be found at <http://des.nh.gov/organization/commissioner/legal/rulemaking/index.htm#aair>.

³ The Facility has the potential to emit a HAP (HAPs, as defined in Section 112 of the 1990 Clean Air Act Amendments) at levels greater than the major source threshold of 10 tpy for any individual HAP. The annual emission limit in Table 5, Item 1 is less than this threshold and establishes the Facility as a synthetic minor source of air pollution for HAPs. The Facility does not have the potential to emit the criteria pollutants SOx, NOx, CO and particulate matter, at levels greater than the major source thresholds for these pollutants. Therefore the Facility is a true minor source for SO₂, NOx, CO, and particulate matter. The facility is a major source of VOC.

Table 5 - Federally Enforceable Operational and Emission Limitations

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Citation
3.	<p>a.) Facility-wide limit of VOC emissions shall be limited to 63.8 tons, on a consecutive 12-month rolling basis.</p> <p>b.) VOC emissions from generic release coating processed in EU03 shall be limited to less than 5 tons during any consecutive 12-month period.</p>	Facility Wide	<p>RACT Order ARD-96-001 Amended November 16, 2012</p>
4.	<p><u>VOC RACT Requirements</u></p> <p>For Line 1B and Line 1C, when applying compliant coatings, defined in Env-A 1202.38 effective June 1, 2011 (formerly Env-A 1204(q)) until January 1, 2016, the Facility shall comply with the provisions of Env-A 1207.03, <i>Applicability Criteria and Compliance Standards for Coating of Paper, Fabric, Film and Foil Substrates</i>, which limits the emission rate of VOC, at all times, to 2.9 lb VOC/gallon of coating; as applied, excluding water and exempt compounds;</p> <p>a.) For line 1B, when applying non-compliant coatings, defined in Env-A 1203.52 effective June 1, 2011 (formerly Env-A 1204.03(az)), the Facility shall demonstrate compliance with the provisions of Env-A 1207.03(a) as specified above by:</p> <ol style="list-style-type: none"> i. Venting all emissions from non-compliant coatings to the thermal oxidizer; or ii. Using the daily weighted average procedure described as follows: <ol style="list-style-type: none"> 1. "VOC_w" means the daily-weighted average VOC content of coatings, as applied, used on a given coating line, in units of pounds of VOC per gallon of coating, minus water and exempt compounds; 2. "n" means the number of different coatings, as applied, used each day on a coating line; 3. "V_i" means the volume of the ith coating, as applied, used each day on a coating line, in units of gallons, minus water and exempt compounds; 4. "C_i" means the VOC content of the ith coating, as applied, used each day on a coating line in units of pounds of VOC per gallon of coating, minus water and exempt compound; 5. "V_T" means the total volume of all coating, as applied, used each day on a coating line in units of gallons, minus water and exempt compounds; and 6. The "VOC_w" shall be equal to the sum, over the n coatings used on a given coating line, of the products of each V_i and C_i, divided by V_T, as in the following equation: $VOC_w = \frac{\sum_{i=1}^n (V_i C_i)}{V_T}$ <p>b.) For Line 1C, when applying non-compliant coatings other than generic release coatings, the Facility shall comply with the provisions of Env-A 1207.03(a) as specified above either by:</p>	EU01 & EU02	<p>Env-A 1200 & RACT Order ARD-96-001 Amended November 16, 2012</p>

Table 5 - Federally Enforceable Operational and Emission Limitations

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Citation
	<ul style="list-style-type: none"> i. Using the daily weighted average procedure as described in Table 5, Item 4(a)(ii). above; or ii. Using generated or purchased DERs to offset excess emissions in accordance with Condition VIII.C; c.) For any generic release coating utilized on Line 1C, the Facility shall: <ul style="list-style-type: none"> i. Limit the emission rate of VOC resulting from the application of the generic release coating, at all times, to 5.9 lb VOC/gallon of coating applied, less water and exempt compounds; and ii. Limit the facility-wide use of the generic release coating to less than 5 tons during any consecutive 12-month period; 		
5.	<p><u>Pollution Control Equipment Operation and Maintenance</u></p> <ul style="list-style-type: none"> a.) RTO shall be operated whenever the non-compliant coatings are run on Line 1B per Table 5, item 4 a). b.) The minimum destruction efficiency shall be at least 95%; c.) The RTO combustion temperature shall not drop below the hourly average temperature at which TTC has demonstrated compliance with 95% destruction efficiency during the most recent DES-approved stack test; d.) The combustion temperature of the RTO shall be monitored and recorded continuously. e.) Bypassing of the RTO shall be monitored and recorded. f.) RTO shall be maintained in a manner consistent with manufacturer's recommendations, Table 6A, and the Monitoring Plan per Table 6, Item 9. g.) The Facility shall operate low-temperature lockout, a low temperature alarm, or a temperature chart which shall be examined at least once every 24 hours to ensure compliance with the combustion temperature identified in Table 5, Item 5(c) above. Records of all temperature monitoring shall be maintained at the facility for inspection for at least 5 years. 	PCE01	Env-A 604.01, Env-A 810 & RACT Order ARD-96-001 Amended November 16, 2012
6.	<p>Prior to the use of any new coating, TTC shall demonstrate compliance by one of the following options:</p> <ul style="list-style-type: none"> a.) Chemical manufacturers Material Safety Data Sheet (MSDS) information (density and weight percent VOC content) along with the Facility coating formulation recipe information (gallons of each ingredient, <i>i.e.</i> coatings, diluent solvent, and exempt diluent solvent; density of each ingredient; and weight percent VOC content of each ingredient). The Facility shall calculate the pounds VOC per gallon coating as applied, minus water and exempt compounds using the following formula: $\frac{P * X}{(1 - Y_w - Y_e)}$ <p>Where:</p> 	EU01, EU02, & EU03	RACT Order ARD-96-001 Amended November 16, 2012

Table 5 - Federally Enforceable Operational and Emission Limitations

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Citation												
	<p>“P” means the density of the mixed coating as applied (pounds coating/gallon coating);</p> <p>“X” means the weight fraction of VOC in the mixed coating;</p> <p>“Y_w” means the volume fraction of water in the mixed coating; and</p> <p>“Y_e” means the volume fraction of exempt compounds in the mixed coating.</p> <p>When using this option, the Facility shall maintain the calculation sheets and records for each coating formulation; or</p> <p>b.) The reference liquid VOC test method specified as follows:</p> <p>c.) Method 24, 40 CFR part 60, Appendix A for all coatings as applicable using the 60-minute bake time procedure; or</p> <p>d.) Method 24A, 40 CFR Part 60, Appendix A as applicable.</p> <p>e.) DES reserves the right to have the Facility perform Method 24 testing on any coatings for formal demonstration of compliance.</p> <p>f.) All Method 24 analyses, Method 9 analyses, and/or calculation sheets for new coatings shall be submitted in the annual VOC report.⁴</p>														
7.	<p><u>Applicability Criteria and Compliance Standards for Coating of Paper, Fabric, Film, and Foil Substrates</u></p> <p>Those processes applying a coating to any woven or non-woven, fibrous or non-fibrous substrate, including paper, fabric, glass matting, plastic film, ribbon, and magnetic tapes shall be subject at all times to the following:</p> <p>a.) After January 1, 2016, operations that have a TPE equal to or greater than 25 tons per consecutive 12-month period, as applied, shall be limited at all times:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th style="text-align: center;">Units</th> <th style="text-align: center;">Pressure Sensitive Tape and Label Surface Coating</th> <th style="text-align: center;">Paper, Film, and Foil Surface Coating (Not including Pressure Sensitive Tape and Label Coating)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Control Efficiency (%)</td> <td style="text-align: center;">90</td> <td style="text-align: center;">90</td> </tr> <tr> <td style="text-align: center;">kg VOC/kg solids (lb VOC/lb solids)</td> <td style="text-align: center;">0.20 (0.20)</td> <td style="text-align: center;">0.40 (0.40)</td> </tr> <tr> <td style="text-align: center;">kg VOC/kg coating (lb VOC/lb coating)</td> <td style="text-align: center;">0.067 (0.067)</td> <td style="text-align: center;">0.08 (0.08)</td> </tr> </tbody> </table> <p>b.) By June 1, 2015, the facility shall submit an application to revise RACT Order ARD-96-001 which was amended on November 16, 2012 to reflect the requirements listed in Table 5, Item 7(a) above.</p>	Units	Pressure Sensitive Tape and Label Surface Coating	Paper, Film, and Foil Surface Coating (Not including Pressure Sensitive Tape and Label Coating)	Control Efficiency (%)	90	90	kg VOC/kg solids (lb VOC/lb solids)	0.20 (0.20)	0.40 (0.40)	kg VOC/kg coating (lb VOC/lb coating)	0.067 (0.067)	0.08 (0.08)	EU01 & EU02	Env-A 1207.03 (effective 6-01-2011)
Units	Pressure Sensitive Tape and Label Surface Coating	Paper, Film, and Foil Surface Coating (Not including Pressure Sensitive Tape and Label Coating)													
Control Efficiency (%)	90	90													
kg VOC/kg solids (lb VOC/lb solids)	0.20 (0.20)	0.40 (0.40)													
kg VOC/kg coating (lb VOC/lb coating)	0.067 (0.067)	0.08 (0.08)													
8.	<p><u>Work Practice Standards for Cleaning Materials Used in Coating of Paper, Fabric, Film and Foil Substrates.</u></p> <p>A paper, fabric, film, or foil coating operation that uses VOC-containing cleaning materials shall control VOC emissions from the cleaning materials using the following work practices:</p>	EU01, EU02, & EU03	Env-A 1207.02 (effective 6-1-2011)												

⁴ Opacity measurements shall be conducted for a stationary source by using the procedures set forth in 40 CFR 60, Appendix A, Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources or by a certified opacity CEM system installed on the stack for which the opacity is being measured.

Table 5 - Federally Enforceable Operational and Emission Limitations

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Citation
	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.		
9.	<u>Visible Emission Standard for Fuel Burning Devices Installed After May 13, 1970</u> The average opacity from fuel burning devices installed after May 13, 1970 shall not exceed 20 percent for any continuous 6-minute period. ⁵	Facility Wide	Env-A 2002.02 (effective 4-23-2013) (SIP Approved rule formerly Env-A 1202)
10.	<u>Particulate Emission Standards for Fuel Burning Devices Installed After May 13, 1970, but before January 1, 1985</u> The particulate matter emissions from fuel burning devices installed after May 3, 1970, but before January 1, 1985 shall not exceed 0.60 lb/MMBtu.	Facility Wide	Env-A 2002.07 (effective 4-23-2013) (SIP Approved rule formerly Env-A 1202)
11.	<u>Particulate Emission Standards for Fuel Burning Devices Installed on or After January 1, 1985</u> The particulate matter emissions from fuel burning devices installed on or after January 1, 1985 shall not exceed 0.30 lb/MMBtu.	Facility Wide	Env-A 2002.08 (effective 4-23-2013) (SIP Approved rule formerly Env-A 1202)
12.	<u>Visible Emission Standards</u> The average opacity shall not exceed 20 percent for any continuous 6-minute period. ⁵	Facility Wide	Env-A 2103.02 (effective 4-23-2013) (SIP Approved rule formerly Env-A 1203)
13.	<u>Calculation of Particulate Matter Emission Standards for New Process Devices</u> Particulate matter emissions from a 'New Device' ⁶ : a.) With a process weight rate up to 30 tons per hour, shall not exceed the emission rate averaged over a one hour period, as specified in the formula below: $E = 4.10 \times P^{0.67}$ or b.) With a process weight rate in excess of 30 tons per hour, shall not exceed the emission rate averaged over a one hour period, as in the formula below: $E = 55.0 \times P^{0.11} - 40$ Where: E = the maximum allowable particulate matter emission rate in pounds per hour; P = the process weight rate in tons per hour	EU01 & EU02	Env-A 2102.04(c) (effective 4-23-2013) (SIP Approved rule formerly Env-A 1203)
14.	<u>Accidental Release Program Requirements</u> The quantities of regulated chemicals stored at the facility are less than the applicable threshold quantities established in 40 CFR 68.130. The facility is subject to the Purpose and General Duty clause of the 1990 Clean Air Act, Section 112(r)(1). General Duty includes the following responsibilities:	Facility wide	CAA 112(r)(1)

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

⁶ New Device - A process or device, used by a manufacturing and service-based industry installed after February 18, 1972.

Table 5 - Federally Enforceable Operational and Emission Limitations

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Citation
	a.) Identify potential hazards which result from such releases using appropriate hazard assessment techniques; b.) Design and maintain a safe facility; c.) Take steps necessary to prevent releases; and d.) Minimize the consequences of accidental releases that do occur.		
15	<u>Permit Deviations</u> In the event of a permit deviation, the Owner or Operator of the affected device, process, or air pollution control equipment shall investigate and take corrective action immediately upon discovery of the permit deviation in order to restore the affected device, process, or air pollution control equipment to within allowable permit levels.	Facility wide	Env-A 911.03 (effective 4-21-2007)
16.	<u>Minor Core Activities</u> One or more minor core activities of VOCs at a stationary source having total aggregate actual emissions of less than 5 tons per year combined for all classifiable and unclassifiable processes or devices, shall be exempt from the provisions of Env-A 1200. ⁷	Facility wide	Env-A 1201.04(c)

c. Emission Reductions Trading Requirements – State Only Enforceable

Per VOC RACT Order ARD-96-001, TTC shall be allowed to use generated or purchased DERs to comply with VOC RACT according to the following:

- (a) Non-compliant coatings shall only be applied on Coating Line 1C when there is a physical limitation preventing TTC from applying the coatings on Coating Line 1B;
- (b) DERs shall only be used to achieve compliance when the RTO is out of service due to a malfunction or routine maintenance, or when a non-compliant coating must be applied on Coating Line 1C;
- (c) The amount of DERs required to achieve compliance shall be calculated according to the following:
 - i) The emission rate limit shall be determined on a solids basis, according to the equation in Section VIII.C(ii)(6) below.
 - ii) The Allowable VOC Emissions per Coating shall be calculated for each coating as follows:
 - (1) “E_{al}” means the allowable VOC emission rate of a given coating in units of lb/month or kg/month;
 - (2) “S” means the VOC emission standard in terms of lb VOC/gal or kg VOC/l of coating solids, as calculated in item 6.c.i, above;
 - (3) “W” means the weight of coating or dilution solvent used in the coating line in units of pounds or kg;
 - (4) “D” means the density of the coating or dilution solvent in units of

⁷ EU03 is considered a minor core activity.

lb/gal coating, or kg/l coating as determined from Method 24 or 24A analysis;

- (5) “V_S” means the volume fraction of the solids content of the coating, in units of gal solids/gal coating or l solids/l coating as determined by calculation using the formulation; and
- (6) “E_{al}” shall be equal to the product of S, V_S and W divided by D for each coating or dilution solvent used, as in the following equation:

$$E_{al} = S * V_S *(W/D)$$

iii) The Actual VOC Emissions per Coating shall be calculated for each coating as follows:

- (1) “E_{ac}” means the actual VOC emission rate of a given coating in units of pounds;
- (2) “W” means the weight of coating or dilution solvent used in the coating line in units of pounds;
- (3) “W_V” means the weight fraction of VOC content of the coating, in units of lb VOC/lb coating as determined by calculation using the formulation; and
- (4) “E_{ac}” shall be equal to the product of W and W_V, as in the following equation:

$$E_{ac} = W * W_V$$

iv) The Excess Emissions per Coating shall be equal to the difference between the actual VOC emissions (E_{ac}) and the allowable VOC emissions (E_{al}).

$$\text{Excess Emissions} = E_{ac} - E_{al}$$

v) At the time of use, TTC shall permanently retire ten percent of all DERs dedicated to that particular use, such that the amount of DERs required to demonstrate compliance shall equal the excess emissions calculated in item iv above divided by an environmental benefit factor of 0.9.

d. Monitoring and Testing Requirements

The Owner or Operator is subject to the monitoring and testing requirements as contained in Table 6 below:

Table 6 - Monitoring/Testing Requirements

Item #	Parameter	Method of Compliance	Frequency of Method	Applicable Emission Unit	Regulatory Citation
1.	Sulfur content of gaseous fuels	Conduct testing to determine the sulfur content in grains of sulfur per 100 cubic feet, of gaseous fuels.	Upon written request by EPA or DES	Facility wide	Env-A 806.03 (effective 10-31-2010)
2.	Opacity Measurement	Per <u>Table 5, Item 6(f)</u> , opacity measurements shall be conducted for a stationary source by using either of the following, following the procedures set forth in 40 CFR 60, Appendix A: a.) Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources; or b.) A certified opacity CEM system installed on the stack for which the opacity is being measured.	Upon request by DES/EPA	EU01 – EU02 & PCE01	Env-A 807.02 (effective 10-31-2010)
3.	VOC content of coatings	For sources subject to Env-A 804.02 the VOC content of the coatings shall be determined as follows: 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; b.) An Owner or Operator relying on supplier formulation data to determine the actual VOC content of a coating shall record all of the formulation required by the VOC data sheet found on page II-2 of EPA document EPA-450/3-84-019, <i>Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings</i> , 1984; c.) To determine facility's compliance with Env-A 1207, the Owner or Operator shall use one of the following methods: 1.) Method 24 as described in 40 CFR 60, Appendix A, using the 60-minute bake time procedure for test ASTM D 2369-01; or 2.) Method 24A as described in 40 CFR 60, Appendix A. d.) Where one or more coating or diluents of the coating formulation chemically reacts with another, in lieu of the methods specified in (c) above, the Owner or Operator shall: 1.) Obtain separate samples of each coating or diluent; 2.) Mix the coatings or diluents in a container in the same proportions as those in the formulation as applied; 3.) Keep the container in which mixing takes place closed between additions and during mixing; 4.) Hold approximately 100 ml of the mixture in a container designed and chosen to minimize headspace prior to withdrawing a sample; 5.) Withdraw a sample from the mixture, transfer the sample to a tarred dish, and allow it to stand	N/A	EU01 – EU02	Env-A 804.03 & Env-A 804.04 (effective 10-31-2010)

Table 6 - Monitoring/Testing Requirements

Item #	Parameter	Method of Compliance	Frequency of Method	Applicable Emission Unit	Regulatory Citation
		for minimum for one hour but not more than 24 hours prior to conducting Method 24 or 24A analysis; and 6.) Conduct Method 24 or 24A of the sample.			
4	RTO Preventative Maintenance	Conduct a visual external integrity inspection of the RTO. a.) The inspection shall include an evaluation of whether all emissions are being vented through the dedicated stack exit. b.) The inspection shall be conducted by personnel familiar with the operation of the oxidizer and associated equipment ⁸ . c.) Annual check for accuracy of RTO thermocouples. Replace thermocouples per manufacturer's recommendations.	As needed, but not less than annually	PCE01	40 CFR 70.6(a)(3) & RACT Order ARD-96-001 Amended November 16, 2012
5	VOC Control Efficiency	Conduct emissions testing to evaluate compliance with the VOC control efficiency requirement in Table 5 Item 5.b. Testing shall be conducted in accordance with Table 6, Items 6, 7 and 8.	Within 5 years of the date of the most recent compliance test	PCE01	Env-A 804 & RACT Order ARD-96-001 Amended November 16, 2012
6	Pretest Protocol & Test Report	Compliance testing shall be planned and carried out in accordance with the following schedule: a.) A pre-test protocol shall be submitted to the Division at least 30 days prior to the commencement of testing; b.) The Owner or Operator and any contractor retained by the Owner or Operator to conduct the test shall meet with a Division representative at least 15 days prior to the test date to finalize the details of the testing; and c.) A test report shall be submitted to the Division within 60 days after the completion of testing.	Within 5 years of the date of the most recent compliance test	PCE01	Env-A 802 & RACT Order ARD-96-001 Amended November 16, 2012
7.	VOC Control Efficiency	The following test methods, or Division approved alternatives, shall be used: a.) USEPA Methods 1-4 for exit flow rate, percentage of carbon dioxide, oxygen and moisture; b.) USEPA Method 25 or 25A for total non-methane VOCs.	Within 5 years of the date of the most recent compliance test	PCE01	Env-A 804 & RACT Order ARD-96-001 Amended November 16, 2012

⁸ TTC currently contracts with the RTO vendor to perform annual inspection and maintenance.

Table 6 - Monitoring/Testing Requirements

Item #	Parameter	Method of Compliance	Frequency of Method	Applicable Emission Unit	Regulatory Citation
		<p>c.) Testing shall be performed at the inlet and outlet of the RTO in order to determine the destruction efficiency of the device.</p> <p>d.) USEPA Method 204 for capture efficiency.</p>			
8.	VOC Control Efficiency	<p>During the compliance testing, the combustion chamber temperature shall be recorded and the corresponding instantaneous and hourly average RTO bed temperatures shall be monitored and recorded during the test. If the hourly average bed temperatures at which compliance is demonstrated during the test are different than those specified in the previous compliance stack test, then the hourly average RTO chamber temperatures recorded during the test shall become the new operational limit for the RTO, as is specified in Table 5, Item 5(c).</p>	Within 5 years of the date of the most recent compliance test	PCE01	Env-A 802 & RACT Order ARD-96-001 Amended November 16, 2012
9.	Monitoring Plan	<p>The Owner or Operator shall prepare a written monitoring plan which documents the maintenance procedures, control equipment parameter monitoring, and any sampling or testing specified by the manufacturer of the device, in order to demonstrate continued effectiveness of the control equipment to comply with the applicable emission standard. The air pollution control equipment monitoring plan shall include the following information:</p> <p>a.) The type of control device;</p> <p>b.) The manufacturer of the control device;</p> <p>c.) The model and serial number of the control device;</p> <p>d.) The pollutant(s) controlled by the device;</p> <p>e.) A description of the control device and how it operates in the process;</p> <p>f.) A description of the bypass and when the RTO bypass is used.</p> <p>g.) The capture efficiency of the device and its method of determination;</p> <p>h.) The control efficiency of the device and its method of determination;</p> <p>i.) The operational parameters of the device that are or will be monitored, such as temperature, pressure, differential pressure, pH, and flow rate, the normal range for each parameter monitored, and the range of each parameter during startup or shutdown conditions, if different;</p> <p>j.) A description of any data recording or recordkeeping, parameter set points and alarms, and corresponding operator responses to malfunctions of the device to prevent uncontrolled emissions of air pollution;</p> <p>k.) The manufacturer's recommended procedures for operation of the device;</p> <p>l.) The manufacturer's recommended scheduled for service, maintenance, and calibration of the device; and</p>	Maintain updated Plan	PCE01	Env-810

Table 6 - Monitoring/Testing Requirements

Item #	Parameter	Method of Compliance	Frequency of Method	Applicable Emission Unit	Regulatory Citation
		m.) Any other operational parameters that affect the ability of the device to control air pollution.			
10.	Compliance Assurance Monitoring	Comply with the requirements listed in 40 CFR Part 64, <i>Compliance Assurance Monitoring</i> .	As needed	PCE01	40 CFR Part 64
11.	Periodic Monitoring	<p>a.) If TTC accumulates excursions of any of the indicator ranges specified in Table 6A, Item 2 for more than 5% of the rolling 12-month total operating time for EU01-PCE01, develop and implement a Quality Improvement Plan (QIP).</p> <p>b.) The QIP shall include procedures for evaluating the control performance problems.</p> <p>c.) Based on the evaluation, modify the plan to include procedures for conducting one or more of the following actions, as appropriate:</p> <ol style="list-style-type: none"> 1.) Improve preventive maintenance practices. 2.) Operational changes. 3.) Appropriate improvements to control methods. 4.) Other steps to improve control performance. 5.) More frequent or improved monitoring. 	As expeditiously as practicable	EU01 & PCE01	40 CFR 64.8

Table 6A –CAM for Thermal Oxidizer for VOC Control

Parameter	RTO Chamber Temperature	Pressure Differential Across the Permanent Total Enclosure (PTE)	Work Practice
1. Indicator a. Measurement Approach	The chamber temperature is monitored with K type thermocouples.	The pressure is monitored with a magnehelic gauge in accordance with Method 204.	Annual I/M of PTE and RTO according to I/M checklist. Maintenance performed as needed.
2. Indicator Range	<p>The temperature indicator range is defined in Table 5, Item 5(c).</p> <p>An excursion is defined as any temperature reading less than Table 5, Item 5(c) based on hourly average. An excursion triggers an inspection, corrective action, and a reporting requirement.</p>	An excursion is defined as any pressure differential reading higher than 0 inches of water. An excursion triggers an inspection, corrective action, and a reporting requirement.	An excursion is defined as failure to perform an annual inspection of PTE and RTO, or failure to perform maintenance as required.

Table 6A –CAM for Thermal Oxidizer for VOC Control

Parameter	RTO Chamber Temperature	Pressure Differential Across the Permanent Total Enclosure (PTE)	Work Practice
3. Performance Criteria a. Data Representativeness	The type K thermocouple is located in the combustion chamber and connected to the lockout mechanism. The thermocouple is of duplex construction with two probes/elements within one sheath. The duplex construction provides an immediate backup probe should the primary thermocouple fail. The minimum accuracy is within $\pm 11^{\circ}\text{F}$.	The magnehelic gauge is located in the PTE on the wall farthest from the intake ducts. The minimum accuracy is $\pm 2\%$ of the scale.	Not applicable
b. QA/QC Practices and Criteria	The RTO is equipped with a lockout mechanism that does not allow the operation of the drying ovens until the RTO combustion chamber temperature reaches the temperature specified in Table 5, Item 5(c).	The gauge shall be re-zeroed on a quarterly basis. PTE doors/curtains shall remain closed whenever not in use.	Qualified personnel performs inspections.
c. Monitoring Frequency	Temperature shall be measured continuously.	Pressure differential shall be measured continuously.	Annual inspections.
i. Data Collection Procedure	Temperature shall be recorded continuously on a strip chart recorder or equivalent.	Pressure differential shall be recorded once per shift.	Record results of annual inspections in a log book.
ii. Averaging Period	Hourly average	Not applicable	Not applicable

e. Recordkeeping Requirements

The Owner or Operator shall be subject to the recordkeeping⁹ requirements identified in Table 7 below:

⁹ NH rules cited in this section as Federally Enforceable are contained in the EPA-approved State Implementation Plan (SIP), or they are awaiting EPA approval and are at least as stringent as the SIP rule. Each citation of a non-SIP rule is followed by the effective date of that rule.

Table 7 - Applicable Recordkeeping Requirements

Item #	Applicable Recordkeeping Requirement	Records Retention/ Frequency	Applicable Emission Unit	Regulatory Citation
1.	The Owner or Operator shall retain records of all required monitoring data, recordkeeping and reporting requirements, and support information for a period of at least 5 years from the date of origination.	Retain for a minimum of 5 years	Facility wide	40 CFR 70.6(a)(3)(ii)(B)
2.	The Owner or Operator shall maintain records of monitoring requirements as specified in Table 6A of this Permit including: a.) Summary of maintenance and repair records for pollution control equipment listed in Table 3; b.) Daily pressure differential measurements; c.) All method 24 analyses per Table 5 item 6(f); d.) Temperature readings; and e.) Periods when the bypass of the RTO is used.	Maintain on a continuous basis	Facility wide	40 CFR 70.6(a)(3)
3.	<u><i>Gaseous Fuel Recordkeeping Requirements</i></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 fuel supplier but at least annually	Facility wide	Env-A 903.03
4.	<u><i>Records on Process Operations</i></u> Monthly records shall be kept regarding process operations including the following information for each process/device: a.) Monthly hours of operation; b.) Quantity of raw materials used per month; and c.) Distribution of the process discharges if the process discharges air pollutants through more than one discharge point.	Monthly	EU01 & EU02	Env-A 901.04
5.	<u><i>VOC Recordkeeping Requirements</i></u> The Owner or Operator shall record and maintain the following information if the actual VOC emissions are greater than or equal to 10 tons per year at the facility: a) Identification of each VOC-emitting device or process, except: i) Processes or devices associated exclusively with non-core activities; and ii) Processes or devices emitting only exempt VOCs. b) Operating schedule information for each VOC emitting device/process identified in a. above, including:	Maintain Data for Annual Report	Facility wide	Env-A 904.02 (SIP approved effective date 4-21-07)

Table 7 - Applicable Recordkeeping Requirements

Item #	Applicable Recordkeeping Requirement	Records Retention/ Frequency	Applicable Emission Unit	Regulatory Citation
	<ul style="list-style-type: none"> i) Days of operation per calendar week during the normal operating schedule; ii) Hours of operation per day during normal operating schedule and for a typical high ozone season day, if different from the normal operating schedule; and iii) Hours of operation per year under normal operating conditions; c) The following VOC emissions data for each VOC-emitting process/device identified in Table 7, Item 5 (a) above: <ul style="list-style-type: none"> i) Annual theoretical potential emissions, using the VOC content for the calculation year, in tons per year and during a typical day during the high ozone season of each year, in pounds per day; ii) Applicable emission factors, if used to calculate emissions; iii) Actual emissions from each VOC-emitting device or process identified in b. above, in tons per year and a typical day during the high ozone season in pounds per day. iv) Estimated emissions code; and v) Applicable emission factors, if used to calculate emissions. 			

Table 7 - Applicable Recordkeeping Requirements

Item #	Applicable Recordkeeping Requirement	Records Retention/ Frequency	Applicable Emission Unit	Regulatory Citation
6.	<p><u>VOC Coating Recordkeeping Requirements</u></p> <p>For all surface coating operations, in addition to the requirements listed in Table 7, Item 5(a), the Owner or Operator shall record and maintain the following information:</p> <ul style="list-style-type: none"> a. Coating or dye formulation and analytical data as follows: <ul style="list-style-type: none"> i. Supplier; ii. Name and color; iii. Type; iv. Identification number; v. Density described in pounds/gallon (lb/gal); vi. Total volatiles content described as weight percent; vii. Water content described as weight percent; viii. Exempt solvent content described as weight percent; ix. VOC content described as weight percent; x. Solids content described as volume percent; xi. Diluent name and identification number; xii. Diluent solvent density described as lb/gal; xiii. Diluent VOC content described as weight percent; xiv. Diluent exempt solvent content described as weight percent; xv. Volume of diluent VOC described as gallons; and xvi. Diluent/solvent ratio described as gallon diluent solvent/gallon coating. b. Solvent throughput data; including records of total annual and typical high ozone season day throughput, in gallons consumed, of each coating or dye formulation provided in compliance with a., above, for each coating/saturation line; c. Process information for each coating line identified in Item 10.b. above, for both the normal operating schedule and for a typical high ozone season day, if different from the normal operating schedule, including: <ul style="list-style-type: none"> i. Method of application; ii. Number of coats for coating operations; iii. Drying method; and iv. Substrate type and form. 	Maintain Data for Annual Report	Facility wide	Env-A 904.03 (SIP Approved effective date 4-21-07)

Table 7 - Applicable Recordkeeping Requirements

Item #	Applicable Recordkeeping Requirement	Records Retention/ Frequency	Applicable Emission Unit	Regulatory Citation
7.	Maintain records of actual emissions for each significant and insignificant activity for determination of emission based fees.	Annually	Facility wide	Env-A 903.01
8.	<p><u>Regulated Toxic Air Pollutants</u></p> <p>Maintain records documenting compliance with Env-A 1400. Compliance was demonstrated at the time of permit issuance as described in the Division's Application Review Summary for application #09-0232 and 12-0042. The source must update the compliance demonstration using one of the methods provided in Env-A 1405 if:</p> <p>a.) There is a revision to the list of RTAPs lowering the AAL or de minimis emission levels for any RTAP emitted from the Facility;</p> <p>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);</p> <p>c.) An RTAP that was not evaluated in the Application Review Summary will be emitted (e.g., a new coating will be used); or</p> <p>d.) Stack conditions (e.g. air flow rate) change.</p>	Update prior to process changes and within 90 days of each revision of Env-A 1400	Facility wide	Env-A 902.01 (State only enforceable)
9.	Recordkeeping of deviations from Permit requirements shall be conducted in accordance with Section XXVIII of this Permit.	Maintain up-to-date data	Facility Wide	Env-A 911 (effective 4-21-2007)
10.	<p>The Facility shall maintain copies of compliance stack test records on site. These records shall be made available to DES/USEPA upon request.</p> <p>a.) The combustion temperature of the RTO shall be monitored and recorded continuously.</p> <p>b.) Maintain records in accordance with the most recent stack test conducted per Table 6, Items 6, 7, and 8.</p>	Maintain up-to-date data	PCE01	RACT Order ARD-96-001 Amended November 16, 2012
11.	<p>Maintain the follow records of DER credits:</p> <p>a.) A brief description of the generation activity;</p> <p>b.) A list of the source's applicable allowable emission rates;</p> <p>c.) The amount of DERs generated each month;</p> <p>d.) A calculation of the amount of DERs generated;</p> <p>e.) The amount of DERs used each month;</p> <p>f.) A calculation of the amount of DERs required to demonstrate compliance with the emission limits stated above;</p> <p>g.) Protocol used to calculate DERs; and</p> <p>h.) Copy of "Notice and Certification of Generation"</p>	Maintain up-to-date data	EU01 & EU02	RACT Order ARD-96-001 Amended November 16, 2012

Table 7 - Applicable Recordkeeping Requirements

Item #	Applicable Recordkeeping Requirement	Records Retention/ Frequency	Applicable Emission Unit	Regulatory Citation
	submitted by the source to the DES.			
12.	The owner or operator of any stationary source or device with add-on VOC control equipment shall record and maintain the following information, as applicable: a) The air pollution control device identification number, type, model number, and manufacturer; b) Installation date; c) Process(es) or device(s) controlled; d) The type and location of the capture system, capture efficiency percentage, and method of e) determining capture efficiency; f) Information as to whether or not the control device is always in operation when the process(es) or device(s) are in operation; g) device(s) are in operation; h) The destruction or removal efficiency of the add-on air pollution control equipment, including: i) Destruction or removal efficiency, in percent; j) Date tested; k) The emission test results, if tested, including: i) The inlet VOC concentration in ppm; ii) The outlet VOC concentration in ppm; and iii) The method of determination of the concentrations in a. and b. above; l) The method of determining destruction or removal efficiency, if not tested; and m) For thermal incinerators, the design combustion temperature in degrees F.	Maintain up-to-date data	PCE01	Env-A 904.07
13.	Quality Improvement Plan Maintain a written QIP when the conditions in Table 6, Item 10 are met.	Maintain continuously if required	PCE01 & EU01	40 CFR 64.8

f. Reporting Requirements

- i. 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 Division on the actual date of receipt by the Division, as evidenced by a date stamp placed on the document by the Division in the normal course of business.
- ii. All emissions data submitted to the Division shall be available to the public. Claims of confidentiality for any other information required to be submitted to the Division pursuant to this permit shall be made at the time of submission in accordance with Env-A 103, *Claims of Confidentiality*.
- iii. The Owner or Operator shall be subject to the reporting requirements identified in Table 8 below.

Table 8 - Applicable Reporting Requirements

Item #	Reporting Requirements	Frequency of Reporting	Applicable Emission Unit	Regulatory Citation
1.	Any report submitted to the DES and/or EPA shall include the certification of accuracy statement outlined in Section XX.B. of this Permit and shall be signed by the responsible official.	As specified in Section XXI.B.	Facility wide	40 CFR 70.6(c)(1)
2.	<u><i>Semi-annual Permit Deviation and Monitoring Report</i></u> The Owner or Operator shall submit a semi-annual permit deviation and monitoring report, which contains: a.) Summaries of all monitoring and testing requirements contained in this permit; and b.) A summary of all permit deviations and excursions that have occurred during the reporting period.	Semi-annually received by DES no later than July 31 st and January 31 st of each calendar year.	Facility wide	Env-A 907.04 (SIP Approved effective date 4-21-2007) & 40 CFR 70.6(a)(3)(iii)(A)
3.	<u><i>VOC Reporting Requirements</i></u> The Owner or Operator shall submit the following information if the actual VOC emissions are greater than or equal to 10 tons per year at the facility: a) Facility information, including: i) Source name; ii) Standard Industrial Classification (SIC) code; iii) North American Industrial Classification System (NAICS) code; iv) Physical address; and v) Mailing address; b) Identification of each VOC-emitting process or device operating at the source identified in (b), above; c) Operating schedule during the high ozone season for each VOC-emitting process or device identified in (b), above, including: i) The typical hours of operation per day; and ii) The typical days of operation per calendar week; and d) The following VOC emissions data: i) Actual calendar year VOC emissions, in tons, from each VOC-emitting process or device identified in (b), above; and ii) The typical high ozone season day VOC emissions, in pounds per day, from each VOC emitting process or device identified in (b), above. e) Coating operations subject to this part shall submit to the department, for each coating line, the information required pursuant to Env-A 904.03 per Table 7, Item 6.	Annually (received by DES no later than April 15 th of the following year)	Facility Wide	Env-A 908 (SIP Approved 4-21-2007)
4.	<u><i>Payment of Emission-Based Fee</i></u> Annual reporting of emission based fees shall be conducted in accordance with Section XXIII of this Permit.	Annually (received by DES no later than April 15 th of the following year)	Significant & Insignificant Activities	Env-A 705.04
5.	<u><i>Annual Emissions Report</i></u> The Owner or Operator shall submit an annual emissions report which shall include the following information: a.) Actual calendar year emissions from each combustions device	Annually (received by DES no later than April 15 th of the following year)	Facility wide	Env-A 907.01

Table 8 - Applicable Reporting Requirements

Item #	Reporting Requirements	Frequency of Reporting	Applicable Emission Unit	Regulatory Citation
	<p>of NOx, CO, SO₂, TSP, and Total VOCs;</p> <p>b.) Actual calendar year emissions from each process devices or operation of VOCs (speciated by individual VOC), HAPs (speciated by individual HAP), and RTAPs (speciated by individual RTAP);</p> <p>c.) The methods used in calculating such emissions in accordance with Env-A 705.02, <i>Determination of Actual Emissions for Use in Calculating Emission-Based Fees</i>; and</p> <p>d.) All information recorded in accordance with Table 7, Item 4.</p>			
7.	Annual compliance certification shall be submitted in accordance with Section XXI of this Permit.	Annually (received by DES no later than April 15 th of the following year)	Facility wide	40 CFR 70.6(c)(5)
8	<p><u>Update to Air Pollution Dispersion Modeling Impact Analysis</u></p> <p>If an update to the facility's air pollution dispersion modeling impact analysis is required pursuant to Env-A 606.02, submit the information required pursuant to Env-A 606.04:</p> <p>a. With the permit application submitted for the change which triggered the analysis; or</p> <p>b. Within 15-days of completion of the change which triggered the analysis, if a permit application is not required..</p>	As specified	Facility-wide	Env-A 910.01
9.	<p>Annually by April 15, TTC shall submit a report to DES on the balance of credits for the previous calendar year. This report shall meet the requirements of Env-A 3103.08, <i>Notice and Certification of Generation</i> and Env-A 3104.09, <i>Notice and Certification of Use</i>, including the following information:</p> <p>c.) The name and location of the owner or operator of the source;</p> <p>d.) A brief description of the generation activity;</p> <p>e.) A list of the source's applicable allowable emission rates;</p> <p>f.) The amount of DERs generated each month;</p> <p>g.) A calculation of the amount of DERs generated;</p> <p>h.) The amount of DERs used each month;</p> <p>i.) A calculation of the amount of DERs required to demonstrate compliance with the emission limits stated above;</p> <p>j.) A statement that the reductions were calculated in accordance with Env-A 3103.07;</p> <p>k.) A statement that the DERs were not generated in whole or in part from actions prohibited pursuant to Env-A 3103.07;</p> <p>l.) A statement that due diligence was made to verify that the DERs were not previously used, and not generated as a result of actions prohibited under the regulations or other provisions of law;</p> <p>m.) A statement that the DERs were not used in a manner</p>	Annually (received by DES no later than April 15 th of the following year)	EU01 & EU02	RACT Order ARD-96-001 Amended November 16, 2012

Table 8 - Applicable Reporting Requirements

Item #	Reporting Requirements	Frequency of Reporting	Applicable Emission Unit	Regulatory Citation
	<p>prohibited under the regulations or other provisions of law; and</p> <p>n.) A certification by a responsible official of truth, accuracy, and completeness that states:</p> <p>o.) Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete; and</p> <p>p.) The user source in compliance with all National Ambient Air Quality Standards, except ground level ozone, and all Ambient Air Limits for Regulated Toxic Air Pollutants.</p>			
10.	<p>Annually by November 30, TTC shall submit a report to DES on the projected use of credits for the upcoming year. This report shall meet the requirements of Env-A 3104.08, <i>Notice of Intent to Use DERs</i>, including the following information:</p> <p>a.) The name and location of the user;</p> <p>b.) A copy of the Notice and Certification of Generation submitted by the generator source to the State (for paperwork reduction purposes, a certified statement that the notice is on file with DES will suffice);</p> <p>c.) The protocol used to document the amount of DERs needed to demonstrate compliance; and</p> <p>d.) A certification statement that TTC is in compliance with Env-A 1400, <i>Regulated Toxic Air Pollutants</i>.</p>	<p>Annually (received by DES no later than November 30th for the following year)</p>	EU01 & EU02	<p>RACT Order ARD-96-001 Amended November 16, 2012 & Env-A 3104.08</p>
11	<p><u>Monitoring Plan Submittal</u></p> <p>Submit to the Division the air pollution control equipment monitoring plan. The air pollution control equipment monitoring plan shall include the information listed in Table 6, Item 9.</p>	<p>Submit report within 60 days after issuance of permit</p>	PCE01	<p>Env-A 810.01 (effective date 10/31/2010)</p>
12	<p><u>Revised RACT Order ARD-96-001</u></p> <p>The facility shall submit an application to revise RACT Order ARD-96-001 which was amended on November 16, 2012 to reflect the requirements listed in Table 5, Item 7(a) above.</p>	<p>Received by DES no later than June 1, 2015</p>	EU01 & EU02	Env-A 1200
13.	<p><u>Quality Improvement Plan Submittal</u></p> <p>Notify DES if the period for completing the improvements contained in the QIP exceeds the 180 days from the date on which the need to implement the QIP was determined.</p>	<p>As expeditiously as practicable</p>	EU01 & PCE01	40 CFR 64.8

IX. Requirements Currently Not Applicable

Requirements not currently applicable to the facility were not identified by the owner or operator.

General Title V Operating Permit Conditions

X. Issuance of a Title V Operating Permit

- A. This Permit is issued in accordance with the provisions of Env-A 609. In accordance with 40 CFR 70.6(a)(2), this Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the five (5) years after issuance of this Permit.
- B. Permit expiration terminates the owner or operator's right to operate the emission units, control equipment or associated equipment covered by this Permit, unless a timely and complete renewal application is received by the Department at least six (6) months before the expiration date.

XI. Title V Operating Permit Renewal Procedures

Pursuant to Env-A 609.07(b), an application for renewal of this Permit shall be considered timely if it is received by the Department at least six (6) months prior to the designated expiration date of the current Title V Operating Permit.

XII. Application Shield

Pursuant to Env-A 609.08, if an applicant submits a timely and complete application for the issuance or renewal of a permit, the failure to have a permit shall not be considered a violation of this part unless or until the Department takes final action on the application.

XIII. Permit Shield

- A. Pursuant to Env-A 609.09(a), a permit shield shall provide that:
 - 1. For any applicable requirement or any state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically included in this Permit, compliance with the conditions of this Permit shall be deemed compliance with said applicable requirement or said state requirement as of the date of permit issuance; and
 - 2. The owner or operator need not comply with any applicable requirement or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution and specifically identified in Section IX of this Title V Operating Permit as not applicable to the stationary source or area source.
- B. The permit shield identified in Section XIII.A. of this Permit shall apply only to those conditions incorporated into this Permit in accordance with the provisions of Env-A 609.09(b). It shall not apply to certain conditions as specified in Env-A 609.09(c) that may be incorporated into this Permit following permit issuance by the Department.
- C. If a Title V Operating Permit and amendments thereto issued by the Department does not expressly include or exclude an applicable requirement or a state requirement found in the New Hampshire Rules Governing the Control of Air Pollution, that applicable requirement or state requirement shall not be covered by the permit shield and the owner or operator shall comply with the provisions of said requirement to the extent that it applies to the owner, operator, stationary source, area source, or device.
- D. If the Department determines that this Title V Operating Permit was issued based upon inaccurate or incomplete information provided by the applicant, owner or operator of a stationary source, area source, or device, any permit shield provisions in said Title V Operating Permit shall be void as to the portions of said Title V Operating Permit which are affected, directly or indirectly, by the inaccurate or incomplete information.

- E. Pursuant to Env-A 909.09(f), nothing contained in Section XIII of this Permit shall alter or affect the ability of the Department to reopen this Permit for cause pursuant to Env-A 609.19 and Condition XIV. or to exercise its summary abatement authority pursuant to RSA 125-C:15, I.
- F. Pursuant to Env-A 609.09(g), nothing contained in this section or in any Title V Operating Permit issued by the Department shall alter or affect the following:
 - 1. The ability of the Department to order abatement requiring immediate compliance with applicable requirements upon finding that there is an imminent and substantial endangerment to public health, welfare, or the environment;
 - 2. The state of New Hampshire's ability to bring an enforcement action pursuant to RSA 125-C:15, II;
 - 3. The provisions of section 303 of the CAA regarding emergency orders including the authority of the USEPA Administrator under that section;
 - 4. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - 5. The applicable requirements of the acid rain program, consistent with section 408(a) of the CAA;
 - 6. The ability of the Department or the USEPA Administrator to obtain information about a stationary source, area source, or device from the owner or operator pursuant to section 114 of the CAA; or
 - 7. The ability of the Department or the USEPA Administrator to enter, inspect, and/or monitor a stationary source, area source, or device.

XIV. Reopening for Cause

The Department shall reopen and revise a Title V Operating Permit for cause if any of the circumstances contained in Env-A 609.19(a) exist. In all proceedings to reopen and reissue a Title V Operating Permit, the Department shall follow the provisions specified in Env-A 609.19(b) through (g).

XV. Administrative Permit Amendments

- A. Pursuant to Env-A 612.01, the owner or operator may implement the changes addressed in the request for an administrative permit amendment as defined in Env-A 101 immediately upon filing the request with the Department.
- B. Pursuant to Env-A 612.01, the Department shall take final action on a request for an administrative permit amendment in accordance with the provisions of Env-A 612.01(b) and (c).

XVI. Operational Flexibility

- A. Pursuant to Env-A 612.02, the owner or operator subject to and operating under this Title V Operating Permit may make changes involving trading of emissions, off-permit changes, and section 502(b)(10) changes at the permitted stationary source or area source without filing a Title V Operating Permit application for and obtaining an amended Title V Operating Permit, provided that all of the following conditions are met, as well as conditions specified in Section XVI.B through E of this Permit, as applicable.
 - 1. The change is not a modification under any provision of Title I of the CAA;

2. The change does not cause emissions to exceed the emissions allowable under the Title V Operating Permit, whether expressed therein as a rate of emissions or in terms of total emissions;
 3. The owner or operator has obtained any Temporary Permit required by Env-A 600;
 4. The owner or operator has provided written notification to the Department and USEPA Administrator of the proposed change and such written notification includes:
 - a. The date on which each proposed change will occur, or has occurred;
 - b. A description of each such change;
 - c. Any change in emissions that will result;
 - d. A request that the operational flexibility procedures be used; and
 - e. The signature of the responsible official, consistent with Env-A 605.04(b); and
 5. The owner or operator has attached the written notice required above to its copy of the current Title V Operating Permit.
- B. For changes involving the trading of emissions, the owner or operator must also meet the following conditions:
1. The Title V Operating Permit issued to the stationary source or area source already contains terms and conditions, including all terms and conditions which determine compliance required under 40 CFR 70.6(a) and (c) and which allow for the trading of emissions increases and decreases at the permitted stationary source or area source solely for the purpose of complying with a federally-enforceable emissions cap that is established in the permit independent of otherwise applicable requirements;
 2. The owner or operator has included in the application for the Title V Operating Permit proposed replicable procedures and proposed permit terms which ensure that the emissions trades are quantifiable and federally enforceable for changes at the permitted facility which qualify under a federally-enforceable emissions cap that is established in the Title V Operating Permit independent of the otherwise applicable requirements;
 3. The Department has not included in the emissions trading provision any devices for which emissions are not quantifiable or for which there are no replicable procedures to enforce emissions trades; and
 4. The written notification required in Condition XVII.A. above is made at least 7 days prior to the proposed change and includes a statement as to how any change in emissions will comply with the terms and conditions of the Title V Operating Permit.
- C. For off-permit changes, the owner or operator must also meet the following conditions:
1. Each off-permit change meets all applicable requirements and does not violate any existing permit term or condition;
 2. The owner or operator provides contemporaneous written notification to the Department and the USEPA Administrator of each off-permit change, except for changes that qualify as insignificant under the provisions of Env-A 609.04;
 3. The change is not subject to any requirements under Title IV of the CAA and the change is not a Title I modification;

4. The owner or operator keeps a record describing the changes made at the source which result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this Permit, and the emissions resulting from those changes; and
 5. The written notification required in Condition XVI.A. above includes a list of the pollutants emitted and any applicable requirement that would apply as a result of the change.
- D. For section 502(b)(10) changes, the owner or operator must also meet the following conditions:
1. The written notification required in Condition XVI.A. above is made at least 7 days prior to the proposed change; and
 2. The written notification required in Condition XVI.A. above includes any permit term or condition that is no longer applicable as a result of the change.
- E. Pursuant to Env-A 612.02(f), the off-permit change and section 502(b)(10) change shall not qualify for the permit shield under Env-A 609.09.

XVII. Minor Modifications

- A. Prior to implementing a minor Title V Operating Permit modification, the owner or operator shall submit a written request to the Department in accordance with the requirements of Env-A 612.05(b) through (d).
- B. The request for a minor permit modification shall include the following:
1. An application form containing all information pertinent to the modification, including, if applicable, the information specified in Env-A 1709;
 2. The fee(s) specified in Env-A 702 through Env-A 705, as applicable;
 3. A description of the change, the emissions resulting from the change, and any new requirements that will apply if the change occurs;
 4. Where air pollution dispersion modeling is required for a source or device pursuant to Env-A 606.02, the information required pursuant to Env-A 606.03;
 5. The owner or operator's proposed draft permit conditions;
 6. Certification by a responsible official, consistent with the provisions of Env-A 605.04(b), that the proposed change meets the criteria for the use of the minor permit modification procedures; and
 7. A request that minor permit modification procedures be used.
- C. The Department shall take final action on the minor permit modification request in accordance with the provisions of Env-A 612.05(e) through (g).
- D. Pursuant to Env-A 612.05(h), the owner or operator may implement the proposed change immediately upon filing a request for a minor permit modification with the Department.
- E. Pursuant to Env-A 612.05(i), pending final action on the permit modification by the Department, the owner or operator shall comply with both the applicable requirements governing the change and the proposed permit conditions.
- F. Pursuant to Env-A 612.05(j) the permit shield specified in Env-A 609.09 shall not apply to minor permit modifications under Section XVII. of this Permit.

- G. Pursuant to Env-A 612.05(a), the owner or operator shall be subject to the provisions of RSA 125-C:15 if the change is made prior to the filing with the Director of a request for a minor permit amendment.

XVIII. Significant Permit Modifications

- A. Pursuant to Env-A 612.06, a change at the facility shall qualify as a significant permit modification if it meets the criteria specified in Env-A 612.06(a)(1) through (5).
- B. Prior to implementing a significant permit modification, the owner or operator shall file a written request with the Department which includes the following:
1. An application form containing all information pertinent to the modification, including, if applicable, the supplemental information specified in Env-A 1709;
 2. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 3. The owner or operator's suggested draft permit conditions;
 4. Certification by a responsible official, consistent with the provisions of Env-A 605.04(b), that the proposed change meets the criteria for the use of the significant permit modification procedures;
 5. A request that the significant permit modification procedures be used;
 6. Air pollution dispersion modeling impact analysis documentation in accordance with Env-A 606.04, as applicable; and
 7. The fee(s) specified in Env-A 702 through Env-A 705, as applicable.
- C. Pursuant to Env-A 612.06(d), the applicant shall forward a copy of the request for a significant permit modification, including those items listed in Condition XVIII.B(1) through (4), to USEPA.
- D. The Department shall take final action on the significant permit modification request in accordance with the provisions of Env-A 612.06(e) and (f).
- E. Pursuant to Env-A 612.06(g), the owner or operator shall obtain an amended Title V Operating Permit from the Department which incorporates the significant permit modification prior to implementing such modification, except as provided in Env-A 609.07(a)(3).
- F. The owner or operator shall be subject to the provisions of RSA 125-C:15 if a request for a significant permit amendment is not filed with the Director and/or the change is made prior to the issuance of an amended Title V Operating Permit.

XIX. Title V Operating Permit Suspension, Revocation or Nullification

Pursuant to RSA 125-C:13 and 541-A:30, the Director may terminate, modify, revoke, or reissue for cause any permit or authorization issued to an affected source, prior to expiration of such permit, consistent with the requirements of the Clean Air Act.

XX. Inspection and Entry

USEPA and 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 or state

requirement found in the New Hampshire Rules Governing the Control of Air Pollution and/or condition of any permit issued pursuant to Chapter Env-A 600.

XXI. Certifications

A. Compliance Certification Report

In accordance with 40 CFR 70.6(c), the Responsible Official shall certify for the previous calendar year that the facility is in compliance with the requirements of this Permit. The report shall be submitted annually, no later than April 15th of the following year. The report shall be submitted to the Department and to the U.S. Environmental Protection Agency – Region I. The report shall be submitted in compliance with the submission requirements below.

In accordance with 40 CFR 70.6(c)(5) and Env-A 907.04, the report shall include the following information for each and every requirement and condition of the effective permit:

1. The particular permit condition or item number that references each requirement, and a brief summary of the requirement;
2. The compliance status of the source with respect to the requirement and whether during the year compliance with the requirement was continuous, intermittent, not achieved, or not applicable;
3. The method(s) used to determine compliance, including a description of the monitoring, recordkeeping, and reporting requirements or test methods;
4. The frequency, either continuous or intermittent, of the method(s) used to determine compliance;
5. If compliance was not continuous, a description of each permit deviation; and
6. Any additional information required in order for the Department to determine the compliance status of the source.

B. Certification of Accuracy Statement

All documents (including any application form, report, or compliance certification) submitted pursuant to 40 CFR 70 to the Department and USEPA shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in accordance with the requirements of 40 CFR 70.6(d) and contain the following language:

“I am authorized to make this submission on behalf of the facility for which the submission is made. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the enclosed documents are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.”

All reports submitted to the Department (except those submitted as emission based fees as outline in Section XXIII of this Permit) shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
29 Hazen Drive
P.O. Box 95

Concord, NH 03302-0095
ATTN: Section Supervisor, Compliance Bureau

All reports submitted to USEPA shall be submitted to the following address:

USEPA-New England, Region 1
5 Post Office Sq. Suite 100
Mail Code OES04-2
Boston, MA 02109-3912

XXII. Enforcement

Any noncompliance with a permit condition constitutes a violation of RSA 125-C:15, and, as to the conditions in this permit which are federally enforceable, a violation of the Clean Air Act, 42 U.S.C. Section 7401 et seq., and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the Department and/or USEPA.

Noncompliance may also be grounds for assessment of administrative, civil or criminal penalties in accordance with RSA 125-C:15 and/or the Clean Air Act. This Permit does not relieve the owner or operator from the obligation to comply with any other provisions of RSA 125-C, the New Hampshire Rules Governing the Control of Air Pollution, or the Clean Air Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

In accordance with 40 CFR 70.6(a)(6)(ii), the owner or operator shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

XXIII. Emission-Based Fee Requirements

- A. Env-A 705.01, *Emission-Based Fee*: The owner or operator shall pay to the Department each year an emission-based fee for emissions from the facility.
- B. Env-A 705.02, *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 facility for each calendar year in accordance with the methods specified in Env-A 705.02.
- C. Env-A 705.03, *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 705.03 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 XXIII.B; and

DPT = The annual fee, in dollars per ton of emissions, which the Department has calculated in accordance with Env-A 705.03¹⁰.

- D. Env-A 705.04, *Payment of Emission-Based Fee*: The owner or operator shall submit to the Department payment of the emission-based fee so that the Division receives it on or before April 15th for emissions during the previous calendar year.

¹⁰ For additional information on emission-based fees, visit the Department's website at <http://des.nh.gov/organization/divisions/air/pehb/apps/fees.htm>.

XXIV. Duty To Provide Information

In accordance with 40 CFR 70.6(a)(6)(v), the owner or operator shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the owner or operator shall also furnish to the Department copies of records that the owner or operator is required to be kept by this Permit. The owner or operator may make a claim of confidentiality as to any information submitted pursuant to this condition in accordance with Env-A 103 at the time such information is submitted to the Department. The Department shall evaluate such requests in accordance with the provisions of Env-A 103.

XXV. Property Rights

Pursuant to 40 CFR 70.6(a)(6)(iv), this Permit does not convey any property rights of any sort, or any exclusive privilege.

XXVI. Severability Clause

Pursuant to 40 CFR 70.6(a)(5), the provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

XXVII. Permit Deviation

Deviations are instances where any permit condition is violated. In accordance with Env-A 911, *Recordkeeping and Reporting Requirements for Permit Deviations*, the owner or operator shall maintain records and report to the Department deviations from permit requirements as follows:

- A. Recordkeeping Requirement – All Deviations – In accordance with Env-A 911.03, in the event of a permit deviation, the owner or operator of the affected device, process, or air pollution control equipment shall investigate and take corrective action immediately upon discovery of the permit deviation to restore the affected device, process, or air pollution control equipment to within allowable permit levels; and record the information per Env-A 911.03(b).
- B. Excess Emissions Reporting Requirement – Excess Emission Deviations Only – In the event of a permit deviation that causes excess emissions, the owner or operator of the affected device, process, or air pollution control equipment shall:
 - 1. Notify the Department of the permit deviation and excess emissions by telephone (603) 271-1370, e-mail (pdeviations@des.nh.gov), or fax (603) 271-7053, within 24 hours of discovery of the permit deviation¹¹; and
 - 2. Submit a written report in accordance with Env-A 911.04(d) to the Department within 10 days of the discovery of the permit deviation reported in Section XXVII.B.1.

¹¹ Unless it is Saturday, Sunday or a state legal holiday, in which event the Department shall be notified on the next day which is not a Saturday, Sunday, or state legal holiday.

- C. Reporting Requirements for Permit Deviations Continuing for Greater Than 9 Consecutive Days – In the event the permit deviation does not cause an excess emission but continues for a period greater than 9 consecutive days, the owner or operator of the affected device, process, or air pollution control equipment shall notify the Department of the subsequent corrective actions to be taken by telephone (603) 271-1370, e-mail (pdeviations@des.nh.gov), or fax (603) 271-7053 on the tenth day of the permit deviation11.
- D. Semi-Annual Summary Report – Pursuant to Env-A 911.05, the owner or operator shall submit a summary of all permit deviations previously reported to the Department pursuant to Section XXVII.B. and C. and a list of all permit deviations recorded pursuant to Section XXVII.A. to the Department in the Semi-Annual Permit Deviation and Monitoring Report due January 31st and July 31st of each calendar year covering the periods of July 1st through December 31st and January 1st through June 30th, respectively, or an alternative time period approved by the Department pursuant to Env-A 912.

Reporting a permit deviation is not an affirmative defense for action brought for noncompliance.