COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Green Bay Packaging Inc.
Winchester Coated Products Division
Frederick County, Virginia
Permit No. VRO81158

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Green Bay Packaging, Inc. has applied for renewal of the Title V Operating Permit for its pressure sensitive material manufacturing facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: LRJ for Laura R. Justin (540) 574-7857 Date: 5/13/14

Air Permit Manager: Janardan R. Pandey Janardan R. Pandey, P.E. Date: 5/13/14

FACILITY INFORMATION

Permittee
Green Bay Packaging Inc.
P. O. Box 19017
Green Bay, WI 54307-9017

Facility
Green Bay Packaging Inc.
Winchester Coated Products Division
285 Park Center Drive
Winchester, Virginia 22603
Plant ID No. 51-069-0108

SOURCE DESCRIPTION

Facility Description: NAICS 322222 (Coated and Laminated Paper Manufacturing)

Green Bay Packaging Inc. - Winchester Coated Products Division (referred to as Green Bay Packaging or the permittee) manufactures pressure sensitive materials for the Roll Label industry. The material is manufactured in wide web, bulk roll form on a large machine called a tandem coating line. All coatings and laminating are done in one process. This process is broken down into various stages. Liner rolls are mounted on a turret and are coated with a solvent-less silicone. The silicone is applied to a gravure roll, which is deposited to a rubber roll and in turn is transferred to the liner. Dryer #1 cures the silicone on the liner. After a cooling and moisturizing stage, the liner is coated with a water-based adhesive by one of three methods. These methods are the Gravure, Mayer rod, or a slot die mechanism. Dryer #2 dries the adhesive. Facer rolls are mounted on the turret. The face material then comes in contact with the silicone-coated liner carrying adhesive in the laminating station. The combined product is rewound into larger diameter rolls. Emission sources include the coating operations and the gas-fired dryers.

The facility is a Title V major source of volatile organic compounds (VOC) and total hazardous air pollutants (total HAP or THAP). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility has a minor new source review (NSR) permit issued on January 21, 2004, as amended on February 12, 2009.

COMPLIANCE STATUS

The most recent full compliance evaluation of this facility, including a site visit, was conducted on December 12, 2013. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

CHANGES SINCE RENEWAL OF THE TITLE V PERMIT IN 2009

The existing Title V permit became effective on May 18, 2009, and one permit modification has been issued since then: a minor modification dated February 15, 2011. This minor modification was issued at the permittee's request in order to update the permit's listing of Insignificant Emission Units after the installation of a second Miura steam generating boiler (rated at 1.977 MMBtu/hr; a similar boiler rated at 2.000 MMBtu/hr had been previously installed in 2008). Although the boiler initially qualified as an insignificant emissions unit under 9 VAC 5-80-720 due to its size, it is now subject to the Boiler MACT (40 CFR 63 Subpart DDDDD) which was promulgated since the unit's installation. Accordingly, it is no longer listed in the Insignificant Emission Units table in the renewed Title V permit. There have been no new source review (minor or major) permit actions for the facility during the most recent term of the Title V permit.

CHANGES TO THE EXISTING TITLE V PERMIT

Revisions to the renewed permit from the existing permit dated May 18, 2009 are summarized below.:

Global Changes: The formatting of the Title V permit has been updated to reflect current agency protocol. This is most apparent in the removal of permit section numbers such that all permit conditions are now numbered sequentially.

Emission Units Section (formerly Section II): Fuel burning units have been added to the emission units table: Units 1M1 and 1M2 (conditioning units for Coating Line 1) and an emergency generator (1EG1). The units previously were considered insignificant emission units under 9 VAC 5-80-720, but are now subject to MACT standards and therefore no longer qualify as insignificant units.

Process Equipment Requirements – Tandem Emulsion Coating Line 1 (formerly Section III): The specification "filterable" has been added to the PM-10 limits in Condition 6, to clarify the intent of the condition.

Fuel Burning Equipment – Units 1M1, 1M2 and 1EG1 (formerly SectionIV): Work practice standards and reporting requirements from the Boiler MACT (40 CFR 63 Subpart DDDDD) have been incorporated into the section. Requirements from the RICE MACT (40 CFR 63 Subpart ZZZZ) applicable to the emergency generator have also been added.

Insignificant Emission Units (formerly Section VII): Units 3T and 3U (now renamed to 1M1 and 1M2) have been removed from the Insignificant Emissions Unit table, since they no longer qualify as insignificant units because they are subject to the Boiler MACT (40 CFR 63 Subpart DDDDD). Additionally, Units 3A and 3R have been dismantled and are no longer operable (see email

correspondence from Jay Jagodinski dated January 24, 2014) and thus have been removed from the Insignificant Emission Units table. Other miscellaneous changes to the table have been made so that the table corresponds to the renewal permit application.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tandem Coating Line							
1		Egan Machinery Company #920282 (constructed 1992) (NSPS Subpart RR) with a total gas-fired rated capacity of 14.4 mmBTU per hour, consisting of:		---	---	---	01/21/04, as amended 02/12/09
	1A	A- Adhesive Application/Dryer #2	563 gallons/hour				
	1C	C- Silicone Application/Dryer #1	19 gallons/hour				
Fuel Burning Equipment							
1M1		Miura LX 50-05 (installed July 2007)	2.000 MMBtu/hr	-	-	-	-
1M2		Miura LX 50-SG07 (installed November 2010)	1.977 MMBtu/hr	-	-	-	-
1EG1		Ford LSG-4231-6005-F	30 kW				

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2012 emission inventory report is included as Attachment A. Emissions are summarized in the following tables.

2012 Criteria Pollutant Actual Emissions (tpy)

	VOC	CO	SO_2	PM-10	NO_x
Unit 1*	21.47	1.26	0.01	1.62	1.50

* Includes fuel burning.

2012 Hazardous Air Pollutant Actual Emissions (tpy)

Vinyl Acetate	0.29

EMISSION UNIT APPLICABLE REQUIREMENTS

Tandem Emulsion Coating Line (Unit 1) (Section III)

Limitations

The tandem emulsion coating line (Unit 1) is subject to 40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. All applicable limitations from Subpart RR have been included in the permit. The following limitations are state BACT and other applicable requirements from the state minor NSR permit, as amended on February 12, 2009, and Subpart RR. Please note that the condition numbers are from the 2009 permit; a copy of the minor NSR permit is included as Attachment B.

Condition 6: Limits VOC emissions to 0.20 pounds of VOC per pound of coating solids applied. This limit is to be calculated on a weighted monthly average. (NSPS Subpart RR)

Condition 2: Limits VOC emissions by requiring the use of water based adhesives.

Condition 3: Requires proper handling of VOCs to minimize emissions.

Condition 7: Emission limits in lbs/day and tons/yr for PM and PM-10, and tons/yr for VOC. Annual emissions are to be calculated monthly as the sum of each consecutive 12-month period. These limits apply only to the coating

operations.

Condition 8: Visible emission limit of 5% opacity on tandem coating line stacks 1A and 1C.

Since Frederick County is classified as a VOC Control Area under 9 VAC 5-20-206.1.e., the following Virginia Administrative Codes - Emission Standards for Paper and Fabric Coating Application Systems (Rule 4-31) - that have specified requirements have been determined to be applicable and included in the permit:

9 VAC 5-40-4330, Standard for volatile organic compounds
9 VAC 5-40-4340, Control Technology Guidelines
9 VAC 5-40-4390, Compliance
9 VAC 5-40-4420, Records

Monitoring

All applicable monitoring requirements from the minor NSR permit and Subpart RR have been included in the permit. The permittee is required to monitor and record on a daily basis the total amount of coating material used and the weighted average VOC and solids fractions of each coating applied using the coating manufacturer's formulation data as required by the minor NSR permit and NSPS Subpart RR. The permittee is required to calculate, on a daily basis, the VOC to solids ratio and the total pounds of VOCs, PM, and PM-10 emitted. Equations for calculating the VOC to solids ratio and emissions of VOCs and PM/PM-10 have been included in the permit. Compliance with the VOC weighted monthly average, PM and PM-10 daily and annual limits, and VOC annual limits can all be demonstrated with a mass balance approach. Therefore, the recordkeeping requirements are adequate to satisfy the periodic monitoring requirement for these limits.

Although there is not a VOC limit in the permit for cleaning solvents, there is a requirement for monitoring and recordkeeping of cleaning solvent usage. These requirements were added as part of the minor NSR permit in cooperation with the permittee to track the facility's efforts to minimize the use of cleaning solvents.

The permit requires records to show that each coating as applied meets the 2.9 pounds per gallon limit.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the VOC content of cleaning solvents; certified Material Safety Data Sheets/VOC Data Sheets or other equivalent documentation; amount of coating material used; weighted average VOC and solids fractions; the VOC to solids ratio; the total pounds of VOC, PM, and PM-10 emitted; and VEE and performance evaluation results.

Compliance Assurance Monitoring (CAM)

This facility does not have any add-on control equipment; therefore, it is not subject to CAM.

Testing

The permit does not require source emission tests for this unit. The permit states that if testing is performed, the permittee shall use appropriate test methods in accordance with procedures approved by the Department. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit includes quarterly/semi-annual reporting of exceedances of the NSPS Subpart RR VOC emission limit. A schedule of reporting periods and report due dates are included in the permit. Copies of the reports are to be sent to DEQ and EPA.

An additional quarterly report is required to be submitted to DEQ that indicates monthly and annual throughput and VOC content of cleaning solvents used, weighted average VOC and solids fractions of each coating applied, the VOC to solids ratio, and the total pounds (daily and annual) of VOC, PM, and PM-10 emitted.

Streamlined Requirements

The 5% opacity limit for the stacks of Unit 1 is more stringent than the Virginia Administrative Code Standard for visible emissions, 9 VAC 5-50-80, 9 VAC 5-40-4350, and 9 VAC 5-40-4360. Therefore, only the more stringent 5% opacity was included in the permit.

Fuel Burning Equipment (Section IV)

Limitations

The following limitation is state BACT from the minor NSR permit, as amended on February 12, 2009. Please note that the condition number is from the 2009 permit; a copy of the permit is included as Attachment B.

Condition 5: Limits fuels to be used at the facility to natural gas and liquified petroleum gas (propane).

The following Virginia Administrative codes that have specified requirements have been determined to be applicable and included in the permit:

9 VAC 5-40-280, Standard for Sulfur Dioxide, Combustion installations.

The following Virginia Administrative Code that has specific emission requirements has been determined to be applicable but has not been included in the permit because the facility process does not have the potential to emit the regulated pollutant:

9 VAC 5-40-290, Standard for Hydrogen Sulfide

Monitoring and Recordkeeping

The permittee will monitor types of fuel purchased. The permittee will keep records of daily and annual throughput of each type of fuel. Annual fuel throughput recordkeeping is necessary for emissions reporting and fee purposes only.

The fuel burning unit for the tandem coating line is rated at 14.4 mmBtu/hr heat input. Using the standard for sulfur dioxide formula in the permit (S=2.64K where S = the allowable emission of the sulfur dioxide in pounds per hour and K = the actual heat input at total capacity expressed in mmBtu/hr), the allowable sulfur dioxide emissions equals 38.02 lb/hr. Based on EPA AP-42 emission factors, the maximum sulfur dioxide emissions from the unit are as follows:

Fuel Type	Capacity of Fuel Burning Equipment	Maximum Hourly Throughput	AP-42 Emission Factor for Sulfur Dioxide	Maximum Sulfur Content (S)	Maximum lb/hr Emissions of Sulfur Dioxide	Sulfur Dioxide Emission Standard
Natural Gas	14.4 mmBtu/hr	0.0144 mmcf/hr	0.6 lb/mmcf	negligible	0.0086 lb/hr	38.02 lb/hr
Propane	14.4 mmBtu/hr	0.1585 mgal/hr	0.1S lb/mgal	15 gr/100cf	0.24 lb/hr	38.02 lb/hr

As shown in the table above, the maximum hourly emission of sulfur dioxide is only a small fraction of the allowable amount. As long as natural gas or propane is combusted in the dryers, the hourly sulfur dioxide standard cannot be exceeded. Therefore, limitations on fuel type combined with the monitoring of type of fuel purchased provide a reasonable assurance that the sulfur dioxide emission limitation is being met and thus satisfies the periodic monitoring requirement.

The permit includes requirements for maintaining records of all monitoring. These records include the DEQ-approved, pollutant-specific emission factors, fuel throughput, and fuel purchase records.

Testing

The permit does not require source emission tests for this unit. The permit states that if testing is performed, the permittee shall use appropriate test methods in accordance with procedures

approved by the Department. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

There are no reporting requirements for the fuel burning equipment.

40 CFR 63 Subpart DDDDD (Boiler MACT) requirements

Units 1M1 and 1M2 are subject to the Major Source Boiler MACT (40 CFR 63 Subpart DDDDD); accordingly, the following requirements have been included in the Title V renewal permit.

- A tune-up shall be conducted on Boilers 1M1 and 1M2 at least once every five years (40 CFR 63.7500(e))
- A one-time energy assessment shall be performed on Boilers 1M1 and 1M2 (40 CFR 63.7540)
- A compliance report shall be submitted at least once every five years (40 CFR 63.7550)

40 CFR 63 Subpart ZZZZ (RICE MACT) requirements

The emergency generator (1EG1) is subject to the RICE MACT (National Emission Standards for HAPs from Stationary Reciprocating Internal Combustion Engines). The following work practice standards (from Table 2c of the MACT) have been included in the permit:

- Change oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Other RICE MACT requirements that have been included in the permit are the requirement to install a non-resettable hour meter, to operate and maintain the emergency generator according to the manufacturer's recommended maintenance plan or a maintenance plan developed by the permittee, and a limit of 100 hours per year of non-emergency operation.

Facility Wide Requirements for Hazardous Air Pollutants ()

Applicability

The facility is subject to the 40 CFR 63 Subpart JJJJ, *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* (POWC MACT). The requirements

became effective on December 5, 2005 and were included in the facility's previous Title V permit. The permit contains two options for utilizing compliant coatings. Conditions 31 through 45 contain the permittee's preferred compliance option and Conditions 46 through 60 contain the alternative compliance option. The permittee has elected not to pursue add-on controls as a compliance option.

The permittee is required to maintain a log to record which compliance option is in effect at any given time. Log entries are to be made contemporaneous with the change and must include the date the change was made and the compliance option in effect.

Limitations

All applicable limitations from the POWC MACT have been included in the permit. Being subject to the POWC MACT means that the permittee is also subject to 40 CFR 63 Subpart A, General Provisions. Any applicable limitations from the general provisions have also been included in the permit.

Monitoring

The POWC MACT contains requirements for continuous compliance, including monthly recordkeeping. The POWC MACT contains adequate monitoring to meet the periodic monitoring requirements, so no additional monitoring has been incorporated into the Title V permit.

Compliance Assurance Monitoring (CAM)

This facility does not have any add-on control equipment and is therefore not subject to CAM.

Recordkeeping

The POWC MACT contains various requirements for recordkeeping, including organic HAP content, volatile matter, and coating solids content data; as well as organic HAP usage, volatile matter usage, and coating solids usage.

The permittee is required to maintain a log for tracking which compliance option is in effect at any given time. The log entry must be made contemporaneously with the change including the date of the change and the compliance option in effect.

Testing

Performance test requirements for "as-purchased" organic HAP mass fraction, for "as-applied" organic HAP mass fraction, for "as-purchased" volatile organic and coating solids content, and for "as-applied" volatile organic and coating solids content have been included in the permit in accordance with 40 CFR 63.3360.

The permit states that if additional testing is performed, the permittee shall use appropriate test methods in accordance with procedures approved by the Department. The Department and EPA have the authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The POWC MACT contains requirements for the submission of a semi-annual compliance report of exceedances of applicable emission limitations. These requirements have been included in the permit and will be submitted concurrently with the reporting requirements contained in 9 VAC 5-80-110.

Streamlined Requirements

The initial applicability notification requirement has already been completed for the POWC MACT; therefore, this notification has not been included in the permit. Also, because the facility has chosen to meet the POWC MACT through coating formulations, no references to add-on control equipment have been included in the permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

INAPPLICABLE REQUIREMENTS

Inapplicable requirements identified by the applicant include 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. The applicant has stated that this regulation is not applicable for any of the storage tanks (Units T4 through T18) because each tank is below the applicability capacity of less than 75 m^3 (19,812.9 gallons).

GREENHOUSE GAS EMISSIONS REQUIREMENTS

According to the renewal permit application, potential CO2e emissions from the facility are 11,944 tons per year. There has not been a new source review modification at the facility within the last permit term that triggered greenhouse gas (GHG) requirements. GHG Mandatory Reporting requirements are not required to be included in Title V operating permits. Accordingly, there are no applicable GHG-related requirements and none are included in the Title V renewal permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act, as they may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
1A, 1C	General Cleaning & Maintenance Activities	9 VAC 5-80-720 B	VOC, HAPs	
3B	Water Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	199,000 BTU/hr
3C, 3D	Office Heating Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3E – 3J	Space Unit Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,200,000 BTU/hr
3K – 3O	Dock Door Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3P	Maintenance Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	60,000 BTU/hr
3Q	Tank Room Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	200,000 BTU/hr
3S	Plant Area Heater (in upstairs boiler room)	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	60, 000 BTU/hr
T4-T9 & T16-T21	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	8,325 Gallons
T10-T15	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	2,650 Gallons
T22	Fixed Roof Internal Storage Tank for Silicone Component	9 VAC 5-80-720 B	VOC, HAPs	6,700 Gallons
19	Parts Washer (solvent or aqueous based)	9 VAC 5-80-720 B	VOC, HAPs	30 Gallon Unit

20	Slitters / Rewinders / Trim Conveying / Coaters Web Cleaning Dust Collection Units / Silicone Mist Vacuum Units / Core Cutters	9 VAC 5-80-720 B	VOC, PM/PM-10	-
21	Wastewater Pretreatment System Chemicals (Ferric Chloride, Lime, Polymer, Antifoam, etc.)	9 VAC 5-80-720 B	PM/PM-10	-

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee submitted a request for confidentiality for the following portions of their Title V application: VOCs and HAPs in the inks, coatings, stains, and adhesive materials, as well as for calculations associated with these materials. The permittee maintains that public release of this information would provide competitors with information that could be used to calculate specific production capabilities, capacities, processes, and/or procedures, which could cause substantial harm to the company's competitiveness. The permittee considers this information to be proprietary and confidential within Green Bay Packaging Inc., and has undertaken measures to protect from disclosure to the general public, its customers, and its own employees. DEQ granted this request for confidential status in a letter to the permittee dated March 10, 2014.

PUBLIC PARTICIPATION

A public notice appeared in the Winchester Star on March 24, 2014 announcing a 30-day public comment period for this permit. The public comment period opened on March 25, 2014 and ended on April 24, 2014, and EPA's comment period ended on May 9, 2014 (concurrent review of the permit as both draft and proposed). No comments were received from the public or from EPA.

ATTACHMENTS

A - 2012 Emissions Inventory Report for Green Bay Packaging Inc.

B - Minor New Source Review permit amended February 12, 2009

ATTACHMENT A

DEQ

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

EMISSION STATEMENT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gather and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: [signature] **DATE:** 2/6/13

PRINTED NAME: Martin J. Olson

TITLE: Senior Vice President

COMPANY: Green Bay Packaging Inc.
Winchester Coated Products Division

REGISTRATION NUMBER: 81158

TELEPHONE NUMBER: 540-678-2600 (or 920-337-1800)

SIGNATURE: [signature] DATE: 2/20/13

For corrections submitted 2013-02-20 by Jay Jagodinski (920-337-1831).

Green Bay Packaging Inc.

Coated Products Operations

Certified Mail # 7011 3500 0003 4160 1837

February 6, 2013

Mrs. Amy T. Owens
Regional Director
Department of Environmental Quality – Commonwealth of Virginia
Valley Regional Office
P.O. Box 3000
Harrisonburg, VA 22801 – 3000

Dear Mrs. Owens,

Enclosed is the 2012 Emission Statement for Green Bay Packaging Inc., Winchester Coated Products Division. This is as required by air permit registration #81158 for our facility, ID number 51-069-0108.

As you review the report, please make note of the following comments.

1. Segment #2, Acetaldehyde, shows 0.0 emissions because the product containing acetaldehyde was not used during calendar year 2012.
2. Control efficiency is 0.0% because there are no emission control devices in use at this facility.
3. Emission factor sources identified as "OTHER" are derived from mass balance based on data provided by the manufacturer.
4. On the Summary Data for Calendar Year 2012, Stack Parameters are the averages of the two stacks on each line per the specifications listed for each individual stack in the modeling analysis submitted 7/10/03.
5. The "NO. OPERATING DAYS" is the number of individual dates the facility operated during the reporting period.
6. In the absence of any appropriate $PM_{2.5}$ emission factors, we are estimating $PM_{2.5}$ emissions are no greater than total PM emissions.

If you have any questions regarding this report, please feel free to contact me.

Sincerely,

Jay R. Jagodinski
Safety & Environmental Manager

Jag 920 337 1800

Enclosures

cc: Marty Olson
Fred Riley
Lisa Bauer

www.gbp.com
3250 South Ridge Road • P.O. Box 19017 • Green Bay, WI 54307-9017 • Phone: 920-337-1800, 800-445-4269, WI: 800-472-4442
FAX: 920-337-1797, 800-705-0111

DEQ
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
DEQ
FEB 11 2013

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

To: _____

2012 EMISSION STATEMENT

File: _____

FACILITY NAME	REGISTRATION #	CONTACT PERSON
GREEN BAY PACKAGING INC. WINCHESTER COATED PRODUCTS DIV.	81158	FREDERICK M. RILEY
LOCATION		**JURISDICTION**
285 PARK CENTER DRIVE WINCHESTER, VA 22603		FREDERICK COUNTY
MAILING ADDRESS	**MAILING CITY AND STATE**	**ZIP CODE**
PO BOX 3568	WINCHESTER, VA	22604
PARENT COMPANY (IF APPLICABLE)	**TELEPHONE**	**PRIMARY NAICS CODE**
GREEN BAY PACKAGING INC.	540-678-2600	322222

FACILITY TOTALS (Sum emissions from attached pages)		
	Annual	Ozone Season
TOTAL VOC EMISSIONS FOR 2012	21.467 Tons/Yr	126.6 Lbs/Day
TOTAL NOx EMISSIONS FOR 2012	1.499 Tons/Yr	8.5 Lbs/Day
TOTAL SO2 EMISSIONS FOR 2012	0.0090 Tons/Yr	N/A
TOTAL PM10 EMISSIONS FOR 2012	1.6246 Tons/Yr	N/A
TOTAL PB EMISSIONS FOR 2012	0.00000750 Tons/Yr	N/A
TOTAL TRS EMISSIONS FOR 2012	0 Tons/Yr	N/A
TOTAL TNMOC EMISSIONS FOR 2012	0 Tons/Yr	N/A
TOTAL non-VOC/non-PM HAP EMISSIONS FOR 2012	0 Tons/Yr	N/A
TOTAL CO EMISSIONS FOR 2012	1.2592 Tons/Yr	N/A
TOTAL PM2.5 EMISSIONS FOR 2012	1.6246 Tons/Yr	N/A
TOTAL NH3 EMISSIONS FOR 2012	1.5525 Tons/Yr	N/A

PLEASE ATTACH "ANNUAL UPDATE" FORM.

PLEASE ATTACH "EMISSION STATEMENT CERTIFICATION" with appropriate signature.

2012 EMISSION CALCULATIONS
OPTION I: EMISSION FACTOR METHOD

Registration # 81158 Point No. 1 Segment No. 1 SCC No. 30701199

	Annual		Ozone Season = June, July, August	
Thruput (with units)	21.38 tons		4.92 tons	
NO. OPERATING DAYS	314 days		78 days	
NO. OPERATING HOURS PER DAY	24 hours		24 hours	
DAILY THRUPUT (with units) = Thruput / Days	N/A		126.1 lbs per day	
VOC EMISSION FACTOR (with units) = EF	1.0 lb/lb		1.0 lb/lb	
Emission Factor Source / Control Efficiency Basis	Other	N/A	Other	N/A
VOC CONTROL DEVICE CODE	000		000	
Avg. VOC CONTROL EFFICIENCY = CE	0.0		0.0	
VOC EMISSIONS	21.38 tons VOC per yr		126.1 lbs VOC per day	

1. AP-42; CEMS; ST=Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet; use subject to DEQ approval).
2. A=Tested (by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 ; Ozone emissions=DAILY THRUPUT x EF x FP x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION II: ENGINEERING ESTIMATE OR MATERIAL BALANCE METHOD

Registration # 81158 Point No. 1 Segment No. 2 SCC No. 30701199

	Annual		Ozone Season = June, July, August	
Thruput (with units)	0.0 lbs		0.0 lbs	
NO. OPERATING DAYS	314 days		78 days	
NO. OPERATING HOURS PER DAY	24 hours		24 hours	
DAILY THRUPUT (with units) = Thruput / Days	N/A		0.00 lbs per day	
ACETALDEHYDE EMISSION FACTOR (with units) = EF	1.0 lb/lb		1.0 lb/lb	
Emission Factor Source / Control Efficiency Basis	Other	N/A	Other	N/A
ACETALDEHYDE CONTROL DEVICE CODE	000		000	
Avg. ACETALDEHYDE CONTROL EFFICIENCY = CE	0.0		0.0	
ACETALDEHYDE EMISSIONS	0.00 tons ACETALDEHYDE per yr		0.00 lbs ACETALDEHYDE per day	

1. AP-42; CEMS; ST=Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet; use subject to DEQ approval).
2. A=Tested by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 ; Ozone emissions=DAILY THRUPUT x EF x FP x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION II: ENGINEERING ESTIMATE OR MATERIAL BALANCE METHOD

Registration # 81158 Point No. 1 Segment No. 4 SCC No. 30701199

	Annual		Ozone Season (April - Oct)	
Thruput (with units)	2.91 lbs		0.00 lbs	
NO. OPERATING DAYS	314 days		78 days	
NO. OPERATING HOURS PER DAY	24 hours		24 hours	
DAILY THRUPUT (with units) = Thruput / Days	N/A		0.00 lbs per day	
FORMALDEHYDE EMISSION FACTOR (with units) = EF	1.0 lb/lb		1.0 lb/lb	
Emission Factor Source / Control Efficiency Basis	Other	N/A	Other	N/A
FORMALDEHYDE CONTROL DEVICE CODE	000		000	
Avg. FORMALDEHYDE CONTROL EFFICIENCY = CE	0.0		0.0	
FORMALDEHYDE EMISSIONS	0.00 tons FORMALDEHYDE per yr		0.00 lbs FORMALDEHYDE per day	

1. AP-42; CEMS; ST=Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet; use subject to DEQ approval).
2. A=Tested (by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 ; Ozone emissions=DAILY THRUPUT x EF x FP x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION II: ENGINEERING ESTIMATE OR MATERIAL BALANCE METHOD

Registration # 81158 Point No. 1 Segment No. 6 SCC No. 30701199

	Annual		Ozone Season = June, July, August	
Thruput (with units)	588.63 lbs		20.25 lbs	
NO. OPERATING DAYS	314 days		78 days	
NO. OPERATING HOURS PER DAY	24 hours		24 hours	
DAILY THRUPUT (with units) = Thruput / Days	N/A		0.26 lbs per day	
VINYL ACETATE EMISSION FACTOR (with units) = EF	1.0 lb/lb		1.0 lb/lb	
Emission Factor Source / Control Efficiency Basis	Other	N/A	Other	N/A
VINYL ACETATE CONTROL DEVICE CODE	000		000	
Avg. VINYL ACETATE CONTROL EFFICIENCY = CE	0.0		0.0	
VINYL ACETATE EMISSIONS	0.29 tons VINYL ACETATE per yr		0.26 lbs VINYL ACETATE per day	

1. AP-42; CEMS; ST=Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet; use subject to DEQ approval).
2. A=Tested (by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 ; Ozone emissions=DAILY THRUPUT x EF x FP x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION I: EMISSION FACTOR METHOD

Registration # 81158 Point No. 1 Segment No. 8 SCC No. 30790003

	Annual		Ozone Season: June, July, August	
Thruput (with units)	29.9816 MMCF		6.6539 MMCF	
NO. OPERATING DAYS	314 days		78 days	
NO. OPERATING HOURS PER DAY	24 hours		24 hours	
DAILY THRUPUT (with units) = Thruput / Days	N/A		0.085 MMCF per day	
VOC EMISSION FACTOR (with units) = EF	5.5 lbs per MMCF		5.5 lbs per MMCF	
Emission Factor Source / Control Efficiency Basis	AP-42	N/A	AP-42	N/A
VOC CONTROL DEVICE CODE	000		000	
Avg. VOC CONTROL EFFICIENCY = CE	0.0		0.0	
VOC EMISSIONS	0.0824 tons VOC per year		0.4682 lbs VOC per day	
NOx EMISSION FACTOR (with units) = EF	100.0 lbs per MMCF		100.0 lbs per MMCF	
Emission Factor Source / Control Efficiency Basis	AP-42	N/A	AP-42	N/A
NOx CONTROL DEVICE CODE	000		000	
Avg. NOx CONTROL EFFICIENCY = CE	0.0		0.0	
NOx EMISSIONS	1.4991 tons NOx per year		8.5306 lbs NOx per day	
SO2 EMISSION FACTOR (with units) = EF	0.6 lbs per MMCF			
Emission Factor Source / Control Efficiency Basis	AP-42	N/A		
SO2 CONTROL DEVICE CODE	000			
Avg. SO2 CONTROL EFFICIENCY = CE	0.0			
SO2 EMISSIONS	0.0090 tons SO2 per year			
PM10 EMISSION FACTOR (with units) = EF	7.6 lbs per MMCF			
Emission Factor Source / Control Efficiency Basis	Other	N/A		
PM10 CONTROL DEVICE CODE	000			
Avg. PM10 CONTROL EFFICIENCY = CE	0.0			
PM10 EMISSIONS	0.1139 tons PM10 per yr			
PB EMISSION FACTOR (with units) = EF	0.0005 lbs per MMCF			
Emission Factor Source / Control Efficiency Basis	AP-42	N/A		
PB CONTROL DEVICE CODE	000			
Avg. PB CONTROL EFFICIENCY = CE	0.0			
PB EMISSIONS	0.00000750 tons PB per yr			
TRS EMISSION FACTOR (with units) = EF	N/A			
Emission Factor Source / Control Efficiency Basis	N/A	N/A		
TRS CONTROL DEVICE CODE	N/A			
Avg. TRS CONTROL EFFICIENCY = CE	N/A			
TRS EMISSIONS	N/A			
CO EMISSION FACTOR (with units) = EF	84.0000 lbs per MMCF			
Emission Factor Source / Control Efficiency Basis	AP-42	N/A		
CO CONTROL DEVICE CODE	000			
Avg. CO CONTROL EFFICIENCY = CE	0.0			
CO EMISSIONS	1.2592 tons CO per yr			

1. AP-42; CEMS; ST=Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet; use subject to DEQ approval).
2. A=Tested (by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 Ozone emissions=DAILY THRUPUT x EF x FF x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION I: EMISSION FACTOR METHOD

Registration # 81158 Point No. 1 Segment No. 9 SCC No. 30701199

	Annual	Ozone Season = June, July, August
Thruput (with units)	3021.37 lbs	733.78 lbs
NO. OPERATING DAYS	314 days	78 days
NO. OPERATING HOURS PER DAY	24 hours	24 hours
DAILY THRUPUT (with units) = Thruput / Days	N/A	9.407 lbs per day
VOC EMISSION FACTOR (with units) = EF		
Emission Factor Source / Control Efficiency Basis		
VOC CONTROL DEVICE CODE		
Avg. VOC CONTROL EFFICIENCY = CE		
VOC EMISSIONS		
NOx EMISSION FACTOR (with units) = EF		
Emission Factor Source / Control Efficiency Basis		
NOx CONTROL DEVICE CODE		
Avg. NOx CONTROL EFFICIENCY = CE		
NOx EMISSIONS		
SO2 EMISSION FACTOR (with units) = EF		
Emission Factor Source / Control Efficiency Basis		
SO2 CONTROL DEVICE CODE		
Avg. SO2 CONTROL EFFICIENCY = CE		
SO2 EMISSIONS		
PM10 EMISSION FACTOR (with units) = EF	1.0 lb/lb	
Emission Factor Source / Control Efficiency Basis	Other | N/A	
PM10 CONTROL DEVICE CODE	000	
Avg. PM10 CONTROL EFFICIENCY = CE	0.0	
PM10 EMISSIONS	1.511 tons PM10 per yr	
PB EMISSION FACTOR (with units) = EF		
Emission Factor Source / Control Efficiency Basis		
PB CONTROL DEVICE CODE		
Avg. PB CONTROL EFFICIENCY = CE		
PB EMISSIONS		
TRS EMISSION FACTOR (with units) = EF		
Emission Factor Source / Control Efficiency Basis		
TRS CONTROL DEVICE CODE		
Avg. TRS CONTROL EFFICIENCY = CE		
TRS EMISSIONS		

1. AP-42; CEMS; ST=Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet, use subject to DEQ approval).
2. A=Tested (by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls")
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 ; Ozone emissions=DAILY THRUPUT x EF x FP x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION I: EMISSION FACTOR METHOD

Registration # 81158 Point No. 1 Segment No. 10 SCC No. 30790003

	Annual		Ozone Season - June, July, August	
Thruput (with units)	29.0816 MMCF		6.6539 MMCF	
NO. OPERATING DAYS	314 days		78 days	
NO. OPERATING HOURS PER DAY	24 hours		24 hours	
DAILY THRUPUT (with units) = Thruput / Days	N/A		0.085 MMCF per day	
TNMOC EMISSION FACTOR (with units) = EF	N/A		N/A	
Emission Factor Source / Control Efficiency Basis	N/A	N/A	N/A	N/A
TNMOC CONTROL DEVICE CODE	N/A		N/A	
Avg. TNMOC CONTROL EFFICIENCY = CE	N/A		N/A	
TNMOC EMISSIONS	N/A		N/A	
CO EMISSION FACTOR (with units) = EF	84.0 lbs per MMCF		84.0 lbs per MMCF	
Emission Factor Source / Control Efficiency Basis	AP-42	N/A	AP-42	N/A
CO CONTROL DEVICE CODE	000		000	
Avg. CO CONTROL EFFICIENCY = CE	0.0		0.0	
CO EMISSIONS	1.26 tons CO per year		7.17 lbs CO per day	
PM 2.5 EMISSION FACTOR (with units) = EF	See cover letter		N/A	
Emission Factor Source / Control Efficiency Basis	N/A	N/A	N/A	N/A
PM 2.5 CONTROL DEVICE CODE	N/A		N/A	
Avg. PM 2.5 CONTROL EFFICIENCY = CE	N/A		N/A	
PM 2.5 EMISSIONS	N/A		N/A	

1. AP-42; CEMS; ST-Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet; use subject to DEQ approval).
2. A=Tested (by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 ; Ozone emissions=DAILY THRUPUT x EF x FP x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION II: ENGINEERING ESTIMATE OR MATERIAL BALANCE METHOD

Registration # 81158 Point No. 1 Segment No. 11 SCC No. 30701199

	Annual		Ozone Season - June, July, August	
Thruput (with units)	3105.00 lbs		767.00 lbs	
NO. OPERATING DAYS	314 days		78 days	
NO. OPERATING HOURS PER DAY	24 hours		24 hours	
DAILY THRUPUT (with units) = Thruput / Days	N/A		9.83 lbs per day	
NH3 EMISSION FACTOR (with units) = EF	1.0 lb/lb		1.0 lb/lb	
Emission Factor Source / Control Efficiency Basis	Other	N/A	Other	N/A
NH3 CONTROL DEVICE CODE	000		000	
(Avg) NH3 CONTROL EFFICIENCY = CE	0.0		0.0	
NH3 EMISSIONS	1.5525 tons NH3 per yr		9.83 lbs NH3 per day	

1. AP-42; CEMS; ST=Stack test; F=Federal factor (EPA) standard factor); O=Other (describe on separate sheet, use subject to DEQ approval).
2. A=Tested (by EPA Reference Method); B=Tested (other); C=Material balance; D=Design; O=Other (describe on separate sheet).
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions=ANNUAL THRUPUT X EF X FP X (1/2000) X (100-CE)/100 ; Ozone emissions=DAILY THRUPUT x EF x FP x (100-CE)/100.

2012 EMISSION CALCULATIONS
OPTION I: EMISSION FACTOR METHOD (continued)

Stack Number 1A Registration # 81158

	Annual	Ozone Season = June, July, August
Stack Height (ft)	40.0*	N/A
Stack Diameter (ft)	2.07*	N/A
Exit Gas Temperature (F)	181*	N/A
Exit Gas Velocity (ft per second)	4.5*	N/A
Elevation (ft above sea level)	685' (floor)	N/A
Gas Flow Rate (cu. ft per minute)	5,264*	N/A

Stack Number 1B

	Annual	Ozone Season = June, July, August
Stack Height (ft)	43.0*	N/A
Stack Diameter (ft)	2.95*	N/A
Exit Gas Temperature (F)	187*	N/A
Exit Gas Velocity (ft per second)	15.2*	N/A
Elevation (ft above sea level)	685' (floor)	N/A
Gas Flow Rate (cu. ft per minute)	24,684*	N/A

*Data per letter to VDEQ, 2003-07-10, updated Form #7 for contruction permit application.

*Stack parameters on the ANNUAL UPDATE Form are the averaged values of stacks 1A and 1B for Coating Line 1.

Registration Number: 81158

County - Plant ID: 069-00108

Plant Name: Green Bay Packaging Inc-Winchester Coated Products

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Parameter List

Pollutant Type: Criteria Pollutants

Years: 2012 - 2012

	CO	NH3	NO2	PM 10	PM 2.5	SO2	VOC
2012	1.259	1.550	1.499	1.624	1.611	0.009	21.462
	1.259 ✓	1.55 ✓	1.499 ✓	1.63 ✓	1.63 ✓	.009 ✓	21.46 ✓

ATTACHMENT B

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

L. Preston Bryant, Jr.
Secretary of Natural Resources

VALLEY REGIONAL OFFICE
4411 Early Road, P.O. Box 3000, Harrisonburg, Virginia 22801
(540) 574-7800 Fax (540) 574-7878
www.deq.virginia.gov

David K. Paylor
Director

Ann A. Thatcher Regional Director

February 13, 2009

Mr. Paul J. Hasemeyer
Senior Vice President
Green Bay Packaging Inc.
P.O. Box 3568
Winchester, Virginia 22604-2575

Facility: Winchester Coated Products Division
Location: Frederick County
Registration No.: 81158
Plant ID No.: 51-069-0108

Dear Mr. Hasemeyer:

Attached is a minor amendment to your minor new source review permit dated January 21, 2004 to modify and operate a pressure sensitive material manufacturing facility in accordance with the provisions of the Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

The Department of Environmental Quality (DEQ) deemed the application complete on January 13, 2009 and has determined that the application meets the requirements of 9 VAC 5-80-1280.A for a minor amendment to a new source review permit.

This permit approval to modify and operate shall not relieve Green Bay Packaging Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by

filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Kevin Covington of the Valley Regional Office at (540) 574-7881.

Sincerely,

Larry M. Simmons, P.E.
Deputy Regional Director

Attachments: Permit
Source Testing Report Format
NSPS, Subpart RR

c: Director, DEQ OAPP (electronic file submission)
Manager, DEQ Data Analysis (electronic file submission)
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

VALLEY REGIONAL OFFICE
4411 Early Road, P.O. Box 3000, Harrisonburg, Virginia 22801
(540) 574-7800 Fax (540) 574-7878
www.deq.virginia.gov

STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

This permit includes designated equipment subject to New Source Performance Standards (NSPS).

This permit supersedes your permit dated August 1, 2000.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Green Bay Packaging Inc.
Winchester Coated Products Division
P.O. Box 3568
Winchester, Virginia 22604-2575
Registration No.: 81158
Plant ID No.: 51-069-0108

is authorized to modify and operate

a pressure sensitive material manufacturing facility

located at

285 Park Center Drive
Fort Collier Industrial Park
Frederick County, Virginia

in accordance with the Conditions of this permit.

Approved on January 21, 2004

Amended on February 12, 2009

Deputy Regional Director, Valley Region

Permit consists of 8 pages.
Permit Conditions 1 to 23.

INTRODUCTION

This permit approval is based on the permit applications dated January 7, 2009 and February 20, 2003, including amendment pages dated July 10, 2003 and supplemental information dated April 11, 2003, May 13, 2003, June 30, 2003, August 12, 2003, September 5, 2003, and October 29, 2003. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses ( ) after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment to be modified and operated at this facility consists of:

   - one tandem emulsion coating line, Egan Machinery Co. 920282. The line contains ovens with a total gas-fired rated capacity of 14.4 million Btu per hour. (NSPS) (Ref. 1);

   Previously permitted equipment at this facility prior to the date of this permit consists of:

   - 15 aboveground, internal storage tanks for coatings and coating components;

   - associated slitters/rewinders; and

   - miscellaneous gas-fired equipment with a total rated capacity of less than 10 million Btu per hour.

   Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.
   (9 VAC 5-80-1180 D 3)

2. **Emission Controls** – Volatile organic compound emissions from the tandem emulsion coating line (Ref. 1) shall be controlled by the use of water based adhesives.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

3. **Pollution Prevention** - Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
(9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-50-20)

4. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the NSPS equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60, Subpart RR.
(9 VAC 5-80-1180, 9 VAC 5-50-400, and 9 VAC 5-50-410)

OPERATING AND EMISSION LIMITATIONS

5. **Fuels** - The approved fuels for process equipment at the facility are natural gas and liquefied petroleum gas (propane). A change in the fuels may require a permit to modify and operate.
(9 VAC 5-80-1180)

6. **Emission Limits** – Volatile organic compound (VOC) emissions from the operation of the tandem emulsion coating line (Ref. 1), as calculated on a weighted monthly average, shall not exceed 0.20 pound of VOC per pound of coating solids applied.
(9 VAC 5-80-1180, 9 VAC 5-50-260, 9 VAC 5-50-410, and 40 CFR 60.442 (a)(1))

7. **Emission Limits** - Emissions from the operation of the tandem emulsion coating line (Ref. 1) shall not exceed the limits specified below:

Particulate Matter (coating operations)	123.0 lbs/day	21.8 tons/yr
PM-10 (coating operations)	123.0 lbs/day	21.8 tons/yr
Volatile Organic Compounds (coating operations)		92.4 tons/yr

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

8. **Visible Emission Limit** - Visible emissions from the tandem emulsion coating line stack shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-1180, 9 VAC 5-50-80, and 9 VAC 5-50-260)

RECORDS AND REPORTS

9. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:

   a. Monthly and annual throughput and VOC content of cleaning solvents used (in pounds), calculated monthly as the sum of each consecutive 12-month period.

   b. Certified Material Safety Data Sheets (MSDS)/VOC Data Sheets showing VOC content, water content, and solids content for each coating used in Ref. 1.

   c. Daily throughput (in pounds), weighted average VOC and solids fractions, and the VOC to solids ratio of each coating used in the tandem emulsion coating line (Ref. 1).

   d. Daily and annual emissions (in pounds) of VOC, PM, and PM-10 from the tandem emulsion coating line (Ref. 1). Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

   e. The daily and annual throughput of natural gas (in cubic feet) and the daily and annual throughput of liquefied petroleum gas (propane) (in gallons) for all fuel burning equipment.

   f. Results of all visible emission evaluations and performance evaluations.

   g. Fuel purchase records including type of fuel purchased.

   These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
   (9 VAC 5-80-1180 and 9 VAC 5-50-50)

10. **Quarterly Reports** – Following the initial report as required in Condition 12, the permittee shall submit a quarterly report to the Director, Valley Regional Office, of exceedances of the VOC emission limit specified in Condition 6 for the tandem emulsion coating line (Ref. 1). If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Director, Valley Regional Office, semi-annually. One copy of the quarterly/semi-annual report shall be submitted to the U.S. Environmental Protection Agency (EPA) at the address specified below:

    Associate Director
    Office of Air Enforcement (3AP10)
    U.S. Environmental Protection Agency
    Region III
    1650 Arch Street
    Philadelphia, PA 19103-2029

After the initial report, subsequent reports shall be submitted in accordance with the schedule contained in Condition 11.

(9 VAC 5-80-1180, 9 VAC 5-50-50, and 9 VAC 5-50-410)

11. **Quarterly Reports** – The permittee shall submit a report to the Director, Valley Regional Office, in accordance with the following schedule:

Time Period Covered by Report	Report Due Date
January 1 – March 31	June 1
April 1 – June 30	September 1 *
July 1 – September 30	December 1
October 1 – December 31	March 1 *

*semi-annual report dates

Each quarterly report shall contain, at a minimum, the dates included in the calendar quarter and a summary of the information requested in parts a, c, and d of Condition 9.
(9 VAC 5-80-1180 and 9 VAC 5-50-50)

INITIAL COMPLIANCE DETERMINATION

12. **Performance Test** – An initial performance test shall be conducted by calculating a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period for the tandem emulsion coating line (Ref. 1) to determine compliance with the emission limit contained in Condition 6 according to the following procedures:

a. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

b. Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

G = the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied each calendar month.

M_{ci} = the total mass (lb) of each coating (i) applied during the calendar month as determined from facility records.

W_{oi} = the weight fraction of VOC applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

The test shall be performed, reported, demonstrate compliance, and the results submitted to the Director, Valley Regional Office (postmarked) within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after modification to tandem emulsion coating line (Ref. 1). The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Valley Regional Office. One copy of the performance test result shall be submitted to EPA at the address contained in Condition 10. The test report shall conform to the test report format enclosed with this permit.
(9 VAC 5-50-30, 9 VAC 5-80-1180, and 9 VAC 5-50-410)

13. **Visible Emissions Evaluation** - Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conducted by the permittee on the following equipment: tandem emulsion coating line stack exhausts 1A and 1B. Each test shall consist of ten sets of 24 consecutive observations (at 15 second intervals) to yield a six-minute average. The details of the tests are to be arranged with the Director, Valley Regional Office. The evaluation shall be performed, reported, and demonstrate compliance within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after modification to tandem emulsion coating line (Ref. 1). One copy of the test result shall be submitted to the Director, Valley Regional Office, within 60 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-50-30 and 9 VAC 5-80-1180)

CONTINUING COMPLIANCE DETERMINATION

14. **Continuing Compliance** - The permittee shall determine compliance with the VOC limit in Condition 6 each calendar month by calculating the weighted average of the mass of solvent used per mass of coating solids applied using the procedure described in Condition 12 for Ref. 1.
(9 VAC 5-50-410)

15. **Testing/Monitoring Ports** - The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided when requested at the appropriate locations in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B).
(9 VAC 5-50-30 F)

GENERAL CONDITIONS

16. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:

a. Knowingly makes material misstatements in the permit application or any amendments to it;

b. Fails to comply with the conditions of this permit;

c. Fails to comply with any emission standards applicable to a permitted emissions unit;

d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard; or

e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.

(9 VAC 5-80-1210 F)

17. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-1180)

18. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the tandem emulsion coating line (Ref. No. 1):

a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

b. Maintain an inventory of spare parts.

c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

c. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E and 9 VAC 5-80-1180 D)

19. **Record of Malfunctions** -- The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9 VAC 5-20-180 J and 9 VAC 5-80-1180 D)

20. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Valley Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Valley Regional Office.
(9 VAC 5-20-180 C and 9 VAC 5-80-1180)

21. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-1180)

22. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Valley Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-1240)

23. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-1180)

SOURCE TESTING REPORT FORMAT

Cover
1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Tester: name, address and report date

Certification
1. Signed by team leader / certified observer (include certification date)
* 2. Signed by reviewer

Introduction
1. Test purpose
2. Test location, type of process
3. Test dates
* 4. Pollutants tested
5. Test methods used
6. Observers' names (industry and agency)
7. Any other important background information

Summary of Results
1. Pollutant emission results / visible emissions summary
2. Input during test vs. rated capacity
3. Allowable emissions
* 4. Description of collected samples, to include audits when applicable
5. Discussion of errors, both real and apparent

Source Operation
1. Description of process and control devices
2. Process and control equipment flow diagram
3. Process and control equipment data

* Sampling and Analysis Procedures
1. Sampling port location and dimensioned cross section
2. Sampling point description
3. Sampling train description
4. Brief description of sampling procedures with discussion of deviations from standard methods
5. Brief description of analytical procedures with discussion of deviation from standard methods

Appendix
* 1. Process data and emission results example calculations
2. Raw field data
* 3. Laboratory reports
4. Raw production data
* 5. Calibration procedures and results
6. Project participants and titles
7. Related correspondence
8. Standard procedures

* Not applicable to visible emission evaluations.

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Title 40: Protection of Environment
PART 60--STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

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Subpart RR—Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

Source: 48 FR 48375, Oct. 18, 1983, unless otherwise noted.

§ 60.440 Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials.

(b) Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of this subpart. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of this subpart.

(c) This subpart applies to any affected facility which begins construction, modification, or reconstruction after December 30, 1980.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.441 Definitions and symbols.

(a) Except as otherwise required by the context, terms used in this subpart are defined in the Act, in subpart A of this part, or in this section as follows:

Coating applicator means an apparatus used to apply a surface coating to a continuous web.

Coating line means any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials.

Coating solids applied means the solids content of the coated adhesive, release, or precoat as measured by Method 24.

Flashoff area means the portion of a coating line after the coating applicator and usually before the oven entrance.

Fugitive volatile organic compounds means any volatile organic compounds which are emitted from the coating applicator and flashoff areas and are not emitted in the oven.

Hood or enclosure means any device used to capture fugitive volatile organic compounds.

Oven means a chamber which uses heat or irradiation to bake, cure, polymerize, or dry a surface coating.

Precoat means a coating operation in which a coating other than an adhesive or release is applied to a surface during the production of a pressure sensitive tape or label product.

Solvent applied in the coating means all organic solvent contained in the adhesive, release, and precoat formulations that is metered into the coating applicator from the formulation area.

Total enclosure means a structure or building around the coating applicator and flashoff area or the entire coating line for the purpose of confining and totally capturing fugitive VOC emissions.

VOC means volatile organic compound.

(b) All symbols used in this subpart not defined below are given meaning in the Act or in subpart A of this part.

a=the gas stream vents exiting the emission control device.

b=the gas stream vents entering the emission control device.

C_{aj}=the concentration of VOC (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.

C_{bi}=the concentration of VOC (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.

C_{fk}=the concentration of VOC (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.

G=the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month.

M_{ci}=the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.

M_r=the total mass (kg) of solvent recovered for a calendar month.

Q_{aj}=the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic meters per hour.

Q_{bi}=the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic meters per hour.

Q_{fk}=the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic meters per hour.

R=the overall VOC emission reduction achieved for a calendar month (in percent).

R_q=the required overall VOC emission reduction (in percent).

W_{oi}=the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

W_{si}=the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.442 Standard for volatile organic compounds.

(a) On and after the date on which the performance test required by §60.8 has been completed each owner or operator subject to this subpart shall:

(1) Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or

(2) Demonstrate for each affected facility;

(i) A 90 percent overall VOC emission reduction as calculated over a calendar month; or

(ii) The percent overall VOC emission reduction specified in §60.443(b) as calculated over a calendar month.

§ 60.443 Compliance provisions.

(a) To determine compliance with §60.442 the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

(1) Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

(2) Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

(3) For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with §60.442(a)(1).

(b) To determine compliance with §60.442(a)(2), the owner or operator shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = \frac{G - 0.20}{G} \times 100$$

If R_q is less than or equal to 90 percent, then the required overall VOC emission reduction is R_q. If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

(c) Where compliance with the emission limits specified in §60.442(a)(2) is achieved through the use of a solvent recovery system, the owner or operator shall determine the overall VOC emission reduction for a one calendar month period by the following equation:

$$R = \sum_{i=1}^{n} \frac{M_r}{W_{oi} M_{ci}} \times 100$$

If the R value is equal to or greater than the R_q value specified in paragraph (b) of this section, then compliance with §60.442(a)(2) is demonstrated.

(d) Where compliance with the emission limit specified in §60.442(a)(2) is achieved through the use of a

solvent destruction device, the owner or operator shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in paragraph (b) of this section to the overall VOC emission reduction demonstrated in the most recent performance test which complied with §60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with §60.442(a)(2).

(e) Where compliance with §60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall continuously record the destruction device combustion temperature during coating operations for thermal incineration destruction devices or the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations for catalytic incineration destruction devices. For thermal incineration destruction devices the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with §60.442(a)(2). For catalytic incineration destruction devices, the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device immediately before the catalyst bed is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with §60.442(a)(2), and all 3-hour periods (during actual coating operations) during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference of the device during the most recent performance test complying with §60.442(a)(2).

(f) After the initial performance test required for all affected facilities under §60.8, compliance with the VOC emission limitation and percentage reduction requirements under §60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

(g) If a common emission control device is used to recover or destroy solvent from more than one affected facility, the performance of that control device is assumed to be equal for each of the affected facilities. Compliance with §60.442(a)(2) is determined by the methods specified in paragraphs (c) and (d) of this section and is performed simultaneously on all affected facilities.

(h) If a common emission control device is used to recover solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator of the existing facility (or facilities) shall determine the mass of solvent recovered for a calendar month period from the existing facility (or facilities) prior to the connection of the affected facility (or facilities) to the emission control device.

(2) The affected facility (or facilities) shall then be connected to the emission control device.

(3) The owner or operator shall determine the total mass of solvent recovered from both the existing and affected facilities over a calendar month period. The mass of solvent determined in paragraph (h)(1) of this section from the existing facility shall be subtracted from the total mass of recovered solvent to obtain the mass of solvent recovered from the affected facility (or facilities). The overall VOC emission reduction of the affected facility (or facilities) can then be determined as specified in paragraph (c) of this section.

(i) If a common emission control device(s) is used to destruct solvent from an existing facility (or facilities) as well as from an affected facility (or facilities), the overall VOC emission reduction for the affected facility (or facilities), for the purpose of compliance, shall be determined by the following procedures:

(1) The owner or operator shall operate the emission control device with both the existing and affected facilities connected.

(2) The concentration of VOC (in parts per million by volume) after the common emission control device shall be determined as specified in §60.444(c). This concentration is used in the calculation of compliance for both the existing and affected facilities.

(3) The volumetric flow out of the common control device attributable to the affected facility (or facilities) shall be calculated by first determining the ratio of the volumetric flow entering the common control device attributable to the affected facility (facilities) to the total volumetric flow entering the common control device from both existing and affected facilities. The multiplication of this ratio by the total

volumetric flow out of the common control device yields the flow attributable to the affected facility (facilities). Compliance is determined by the use of the equation specified in §60.444(c).

(j) Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified at §60.442(a)(2) is being attained.

[48 FR 48335, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.444 Performance test procedures.

(a) The performance test for affected facilities complying with §60.442 without the use of add-on controls shall be identical to the procedures specified in §60.443(a).

(b) The performance test for affected facilities controlled by a solvent recovery device shall be conducted as follows:

(1) The performance test shall be a one calendar month test and not the average of three runs as specified in §60.8(f).

(2) The weighted average mass of VOC per mass of coating solids applied for a one calendar month period shall be determined as specified in §60.443(a) (1) and (2).

(3) Calculate the required percent overall VOC emission reduction as specified in §60.443(b).

(4) Inventory VOC usage and VOC recovery for a one calendar month period.

(5) Determine the percent overall VOC emission reduction as specified in §60.443(c).

(c) The performance test for affected facilities controlled by a solvent destruction device shall be conducted as follows:

(1) The performance of the solvent destruction device shall be determined by averaging the results of three test runs as specified in §60.8(f).

(2) Determine for each affected facility prior to each test run the weighted average mass of VOC per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in §60.443(a). In this application the quantities of W_{oi}, W_{si}, and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in §60.441.

(3) Calculate the required percent overall VOC emission reduction as specified in §60.443(b).

(4) Determine the percent overall VOC emission reduction of the solvent destruction device by the following equation and procedures:

$$[illegible]$$

(5) The owner or operator of the affected facility shall construct the overall VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.446(b).

(6) The owner or operator of an affected facility shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive VOC emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is totally capturing fugitive VOC emissions, then no additional total enclosure will be required for the performance test.

(7) For each affected facility where the value of R is greater than or equal to the value of R_s calculated in §60.443(b), compliance with §60.442(a)(2) is demonstrated.

§ 60.445 Monitoring of operations and recordkeeping.

(a) The owner or operator of an affected facility subject to this subpart shall maintain a calendar month record of all coatings used and the results of the reference test method specified in §60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.

(b) The owner or operator of an affected facility controlled by a solvent recovery device shall maintain a calendar month record of the amount of solvent applied in the coating at each affected facility.

(c) The owner or operator of an affected facility controlled by a solvent recovery device shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of solvent recovered by the device over a calendar month period. The monitoring device shall be accurate within ±2.0 percent. The owner or operator shall maintain a calendar month record of the amount of solvent recovered by the device.

(d) The owner or operator of an affected facility operating at the conditions specified in §60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

(e) The owner or operator of an affected facility controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5 °C.

(f) The owner or operator of an affected facility controlled by a catalytic incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed.

(g) The owner or operator of an affected facility controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.

(h) Records of the measurements required in §§60.443 and 60.445 must be retained for at least two years following the date of the measurements.

§ 60.446 Test methods and procedures.

(a) The VOC content per unit of coating solids applied and compliance with §60.422(a)(1) shall be determined by either Method 24 and the equations specified in §60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

(b) Method 25 shall be used to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere. Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flowrate, molecular weight, and moisture of all sampled gas streams. For Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(c) If the owner or operator can demonstrate to the Administrator's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Administrator will approve testing of representative stacks on a case-by-case basis.

[48 FR 48375, Oct. 18, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.447 Reporting requirements.

(a) For all affected facilities subject to compliance with §60.442, the performance test data and results

from the performance test shall be submitted to the Administrator as specified in §60.8(a) of the General Provisions (40 CFR part 60, subpart A).

(b) Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in §60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(c) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.443(e). If no such periods occur, the owner or operator shall state this in the report.

(d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[48 FR 48375, Oct. 18, 1983, as amended at 55 FR 51383, Dec. 13, 1990]

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