

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Siegwerk USA Co.
Lynchburg, Virginia
Permit No. BRRO-21535

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, Siegwerk USA Co. has applied for a renewal of the Title V Operating Permit for its environmental site remediation of soil and groundwater. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____
Terry Moore
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Air Permit Manager: _____ Date: _____
David J. Brown

Regional Director _____ Date: _____
Robert J. Weld

FACILITY INFORMATION

Permittee

Siegwerk USA Co.
3535 SW 56th Street
Des Moines, Iowa 50321

Facility

Siegwerk USA Co.
4225 Murray Place
Lynchburg, VA 24501

State-County-Plant Identification Number: 51- 680-00211

SOURCE DESCRIPTION

NAICS Code: 562910 – Remediation of soil and groundwater

Siegwerk USA Co. (Siegwerk) is permitted to operate an environmental site remediation of soil and groundwater containing toluene. The remediation process uses soil vapor extraction (SVE) and multiphase extraction (MPE) technologies to extract vapor and groundwater from vertical extraction wells. Extraction of vapor and groundwater from the subsurface will result in the mass removal of toluene and minor impurities (benzene, ethylbenzene, and xylenes), which are contained in the toluene product released to soil and groundwater.

The site remediation is addressed by a Title V permit and the 3/23/11 NSR Permit as delineated below:

- Title V permit dated 5/03/09, amended 6/21/12 (**6/21/12 T5**)
The Title V permit dated 5/03/09 contained requirements for ink manufacturing (e.g., equipment, tanks, loading racks) and a SVE and groundwater recovery system; and was for Reg. No. 30595¹. The Title V permit was amended 6/21/12 to remove ink manufacturing equipment² leaving only the SVE and groundwater recovery system as

¹The ink manufacturing facility was sold by Siegwerk to World Color Procurement LLC (World Color). The liability for the site remediation remained with Siegwerk; and the requirements for the remediation system remained in the Title V permit for the facility (i.e., Reg. 30595) located at 4225 Murray Place. The facility received a State Operating Permit (SOP) dated 1/31/06 which limited HAP emissions to 10 tons per year for an individual HAP and 25 tons per year combination of HAPs (i.e. less than the applicability threshold for a Title V permit). However, the facility became subject to MACT GGGGG before the SOP permit was issued; and therefore, is subject to EPA's "once in always in" MACT policy.

²World Color closed the ink manufacturing facility and a shutdown agreement letter with the DEQ was signed (effective date of 6/21/12).

addressed in the NSR permit dated 2/5/03³; and the Title V Permit was transferred from World Color (Reg. No. 30595) to Siegwerk (Reg. No. 21535).

NSR 3/23/11 Permit

This permit is for a SVE/multiphase extraction (MPE) system at the 4225 Murray Place, Reg. No. 21535⁴. The system includes SVE equipment (extraction wells, piping, positive displacement blower, air/water separator, control systems, equipment housing and utility infrastructure) as permitted by the 2/5/03 permit and new equipment for multiphase extraction (MPE) system.

The Title V renewal permit addresses the remediation system in the 3/23/11 Permit as included in the Title V permit renewal application.

COMPLIANCE STATUS

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 is in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following: See Title V Permit Emission Units Table.

EMISSIONS INVENTORY

The 2014 annual emission update is summarized below.

Emission Unit	2014 Criteria Pollutant Emission in Tons/Year				
	VOC ^a	CO	SO ₂	PM ₁₀	NO _x
Facility	0.00957	-	-	-	-
Total	0.00957				

^a VOC = HAPs= Toluene

³ Per the DEQ's 3/23/11 engineering analysis for the 3/23/11 permit the remediation system identified in the 2/5/03 permit was shut down by Siegwerk on 5/30/09 in advance of the sale of the ink manufacturing facility to World Color. Also, the new remediation system contained equipment from the old system.

⁴The remediation site was assigned a State-County-Plant code of 51-680-00211. This SOB and the Title V renewal permit address Reg. No. 21535.

The new Title V permit includes the following format changes from the **6/21/12 T5 Permit**:

- New condition numbering format.
- The regional office name is updated to the current title (i.e., Blue Ridge Regional Office).
- On 11/7/12, a set of amendments to Virginia’s minor NSR program became effective. Those amendments included a new section 9VAC5-80-1255, “Actions to combine permit terms and conditions.” Because of the requirements of that section, it became important to distinguish between “permit approvals” and the “permit documents” in which such approval are housed. Therefore, the citations in the Title V permit now appear as “x/y/zz Permit Document” instead of “x/y/zz Permit”. Also, the “Applicable Permit Date” column in Emission Units Table is now “Permit Document Date”.

EMISSION UNIT REQUIREMENTS – Soil Vapor Extraction and Groundwater Recovery Systems (Ref. Nos. S1 and S2)

The applicable requirements in the Title V renewal permit (**T5**) are summarized below by the **T5** permit Condition Number⁵. The conditions are delineated by the source of the requirement (e.g., 3/21/11 Permit, MACT Subpart GGGGG, Title V General Permit conditions) and the type of requirement (e.g., limitations, monitoring).

The conditions from the 3/23/11 permit⁶ and their Title V applicability are discussed below in **3/21/11 NSR Permit**. The applicable requirements from the MACT Subpart GGGGG are discussed in the **MACT Requirements - Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation**.

The Emission Units Table in the **T5** permit has been changed from the **6/21/12 T5** Permit as follows:

- “2011” added to the Emission Unit Description.
- The Size/Rated Capacity of the system revised from 200 to 609 acfm.
- The equipment from the 3/23/11 permit equipment list is added to the table.

3/21/11 NSR Permit

Applicable conditions from the 3/21/11 permit are grouped and listed in the **T5** as summarized below:

Limitations

1. *NSR No. 2* (T5 III.A.1) VOC emissions from the soil vapor and groundwater recovery systems shall be controlled by a thermal catalytic oxidizer (CATOX or oxidizer) with recuperative heat recovery and it shall be in operation when the soil vapor extraction and

⁵ To assist the reader in viewing the new **T5** conditions the corresponding condition from the amended **6/21/12 T5** is listed in the summary of each **T5** condition – e.g., for **T5 No. 1** is Condition III.A.1 from the **6/21/12 T5** is listed as “(T5 III.A.1)” is listed from **6/21/12 T5**.

⁶ The conditions numbers from the 3/21/11 permit are listed in italic font (e.g., *NSR No. 2* is listed for Title V Condition **T5 No. 1**).

groundwater recovery systems are operating.

2. *NSR No. 3* (T5 III.A.2) The oxidizer shall maintain a control efficiency for VOC of no less than 95 percent on a mass basis.
3. *N/A NSR* (T5 III.A.3) The oxidizer maintain a minimum oxidizer inlet temperature⁷ of 650°F.
4. *NSR No. 10* (T5 III.A.4) Opacity limit on the oxidizer.
5. *NSR No. 9* (T5 III.A.5) VOC emission limits of the soil vapor extraction and groundwater recovery system revised to address the limits from the new system. Referenced **T5 No. 6, 7 and 8** (T5 III.B.2, III.B.3 and III.B.1).

Monitoring

6. *NSR No. 4* (T5 III.B.1) Activity tests for the catalyst in percent of VOC destruction. This test is conducted on an annual basis. The test reports submitted to the DEQ include measured laboratory results (Pre-CATOX Inlet and Post-CATOX Stack concentrations) field measurement (e.g. inlet and outlet CATOX temperatures, air flows) destruction efficiency, and hourly and annual emissions calculations.
7. *NSR No. 5* (T5 III.B.2) Oxidizer equipped with devices to measure catalytic oxidizer gas temperature.
8. *NSR No. 6* (T5 III.B.3) Temperature monitoring device observation and observation log requirements. In addition the **T5** requires the following: (1) the observation log to include operation outside of the operating temperature range and (2) action taken to return to within the temperature range.
9. *N/A NSR* (N/A) Establish minimum and maximum temperature operating range and include in the facility's SSM Plan⁸.
10. *N/A NSR* (T5 III.B.4) Visible emission stack observation and if visible emissions are observed take timely corrective action for the system to resume operation with no visible emissions⁹.

Siegwerk proposed in the Title V renewal application to modify the observation schedule in the **6/21/12 T5 permit** from weekly to monthly, based on operational data¹⁰ (see page 4-1 of the 10/25/13 application). There are no on-site remediation personnel and the

⁷ This is a change to the to the 600°F minimum inlet temperature stated in the **6/21/12 T5**, which is the value stated in the NSR 2/5/03 permit. The 3/23/11 permit does not state a minimum inlet temperature.

⁸ Siegwerk submitted to the DEQ an updated SSM Plan that references the conditions in the draft Title V permit

⁹ Siegwerk's Title V renewal application identified "timely corrective action" or "conduct a VEE on the systems' stack" if the presence of visible emissions were observed. However, the justification for going from weekly to monthly visual observation included "no visible emissions observed" (see next footnote). Therefore, the VEE option is not included in the draft Title V.

¹⁰ From Page 4-1 of the 10/25/13 renewal application – "No visible emissions observed for the first 15 months of operation and future visible emission are not expected given that the electric catalytic oxidizer is treating toluene vapor using dual catalyst beds with outlet temperature substantially higher than 700 degrees Fahrenheit." Also, an 8/5/15 email from Mr. James Spencer further states "Weekly opacity observations have been conducted since system startup in June 2012; no visible emissions were observed during these inspections or at other times of system operation."

site/facility is unmanned because there are no on-going operations. Except for the weekly observation visit required by the **6/21/12 T5**, the remediation system is normally operated remotely with only periodic visits or if monitored operating parameters require a site visit.

The hourly and annual VOC emission calculations provided in the report for the annual activity test report (see **T5 No. 6**) along with the required temperature monitoring and recording are considerable sufficient monitoring for demonstrating compliance with the permitted VOC emission limits.

The CATOX is electric, with no auxiliary fuel burning. Therefore, visible emissions could be emitted if the operating temperature is low enough for incomplete combustion of the VOC material. The 650°F stated in **T5 No. 3**, which is greater than the 600°F minimum temperature in the current Title V permit, will ensure the combustion of the VOCs. This temperature along with the monitoring of the inlet temperature (i.e., continuous and observation at a frequency of not less than once per day per **T5 No. 8**) and monthly visible emission observation (instead of weekly) are considerable sufficient monitoring for demonstrating compliance with the permitted opacity limit.

The maintaining and proper operation of the CATOX is addressed by the facility's VOC Monitoring Plan⁸ and SSM Plan (see **T5 No. 20**). The CATOX is equipped with Continuous Parameter Monitoring System for inlet and outlet temperatures. The CATOX operating temperature range (minimum inlet and maximum outlet temperatures) as established during the activity tests is stated in the SSM Plan.

The above monitoring and the recordkeeping discussed below are sufficient to assure compliance with the limitations in this permit.

Recordkeeping

11. NSR No. 12, 17 and 18 (T5 III.C) Recordkeeping requirements. In addition, the **T5** requires the following records:

- Visible emission stack observations and log required in **T5 No. 10**.
- Records of catalytic oxidizer gas temperature both immediately upstream and downstream of the catalyst bed required in **T5 No. 7**.
- Temperature log required in **T5 No. 8**, with details regarding any necessary corrective action.
- Copies of the facility's written SSMP and VOC Monitoring Plan.

Testing

12. NSR No. 7 (T5 III.D) Facility constructed so as to allow for emissions testing at any time using appropriate methods.

13. N/A NSR Condition (N/A) - New from the Title V boilerplate requiring the use of appropriate method(s).

The following conditions are included in the **T5 Facility Wide or General** conditions as delineated:

- *NSR No. 15* - permit suspension/revocation: **General T5 No. 67.**
- *NSR No. 16* - right of entry: **General T5 No. 57.**
- *NSR No. 17* - maintenance/operation procedures as **Facility Wide T5 No. 29**; with records of training as part of **T5 No. 11** recordkeeping.
- *NSR No. 19* - notification of facility or control equipment malfunction: **General T5 No. 45.**
- *NSR No. 20* - violation of ambient air quality standard: **Facility Wide T5 No. 30.**
- *NSR No. 21* - change of ownership: **General T5 No. 61.**
- *NSR No. 22* - copy of the permit on-site: **General T5 No. 59.**

The following conditions from the 3/21/11 permit are not included in the **T5** because the requirement has been completed (e.g., initial performance test) or no longer specific to the NSR permit itself (permit invalidation) as delineated:

- *NSR No. 11* - initial performance tests: completed.
- *NSR No. 13* - initial notifications: completed.
- *NSR No. 14* - permit invalidation: The modification as addressed by the NSR permit is completed; and therefore the condition is no longer applicable.

There are no streamlined conditions identified from the 3/21/11 permit.

MACT Requirements - Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation

The soil vapor extraction and ground water recovery system is subject to 40 CFR Part 63 Subpart GGGGG per §§63.7881(a)¹¹ and 63.7882¹². The applicable requirements of the subpart are identified by the **T5** conditions¹³ as grouped and identified below by type of requirement (e.g.

¹¹ The exemptions of §63.7881(b) and (c) do not apply as delineated:

- §63.7881(b) - total quantity of the HAP* exceeds the less than 1 megagram (Mg) (2,204.622 pounds) annual threshold.
*HAP as listed in Table 1 of Subpart GGGGG, which are identified in the T5 renewal application as benzene, toluene, ethylbenzene and total xylenes.
- §63.7881(c) - remediation activities are not completed.

¹² §63.7882(a) and (c) are applicable; and (b) defines “existing” source; and the unit installed and operated per the 3/23/11 permit is a “new” sources:

- §63.7882(a) identifies affected sources as (1) Process vents, (2) Remediation material management units and (3) equipment leaks and defines these sources.
- §63.7882(c) defines “new” source as “commenced construction or reconstruction of the affected source on or after July 30, 2002).

¹³ The draft T5 contains more types of requirements than the following six types in Condition IV of the **6/21/12 T5**: (1) Federal requirements, (2) limitations and work practice standards, (3) inspection and monitoring, (4) record and recordkeeping, (5) reporting and (6) testing.

emission limit) and by the equipment (e.g., tank). For the purpose of Subpart GGGGG, terms are defined in §63.7957. Attachment A to this SOB provides an applicability summary^{14, 15} of Subpart GGGGG by the regulatory citation.

General Standards

14. Applicable general standards from Subpart GGGGG are addressed by the following:

- a. Site remediation - see §63.7884(a)
- b. Remediation material management units - see §63.7886(a); and §63.7886(b)(1) is the selected option.
- c. Equipment leaks - see §63.7887(a). “(b)” is not applicable because the system is not subject to another subpart.

Emissions Limitations and Work Practices

15. Applicable emissions limitations and work practices from Subpart GGGGG are addressed for the equipment as delineated below:

- a. **Tanks** - see §63.7895(a), which requires the following; and the applicable requirements are identified as delineated¹⁶:
 - (b), *applicable* and references (c) and (d)
 - (c), Tank Level 1 controls, is *applicable* per Table 2 of Subpart GGGGG.
 - (d), Tank Level 2 controls, not applicable
 - (e) allows alternative work practice standards per EPA approval. Siegwerk has not submitted a request.
- b. **Oil-water Separators** - see §63.7910(a), which requires the following; and the applicable requirements are identified as delineated:
 - (b)(1), floating roof, not applicable

¹⁴ The summary is obtained from Siegwerk’s 40 CFR Part 63 Subpart GGGGG Applicability submittal dated 4/20/16 via email from Mr. Spencer of URS.

¹⁵ Specific requirements do not apply because the type of emission units are not located at the site or not subject to other MACT subparts as delineated below and identified in Attachment A.

- Process Vents – There is no process vent as defined by §63.7957. Therefore, requirements §§63.7890 through 63.7893, and other requirements associated with “process vents” are not applicable.
- Containers – There are no containers. Therefore, requirements §§63.7900 through 63.7903, and other associated requirements are not applicable.
- Surface impoundments – There are no surface impoundments. Therefore, requirements §§63.7905 through 63.7908, and other associated requirements are not applicable.
- The soil vapor extraction and ground water recovery system is not subject to the other listed subparts (e.g., 40 CFR Part 63 Subpart DD Off-Site Waste and Recovery Operations). Therefore, §63.7888 using the cross-referenced requirements in other subparts is not applicable.

¹⁶ The applicable requirement from Subpart GGGGG is identified by italic font and the requirement is included in the specific related Title V permit condition for the on-site equipment that is subject to this subpart and for each requirement category (e.g., Emissions Limitation and Work Practices Standards, Inspection and Monitoring). The requirement may be referenced or directly stated depending on the level of detail determined to be necessary to identify the requirement. The subpart’s requirements that are “alternative” and subject to EPA’s approval if requested, are identified as not applicable, unless requested by Siegwerk to be included in the T5 permit.

- (b)(2), fixed roof, **applicable**
 - (c) allows alternative work practice standards per EPA approval. Siegwerk has not submitted a request.
- c. Transfer Systems** - see §63.7915(a), which requires the following; and the applicable requirements are identified as delineated:
- (b), individual drain system, **applicable**
 - (c)(2) and (3) are **applicable**. (c)(1) is not applicable because covers are not used.
 - (d) allows alternative work practice standards per EPA approval. Siegwerk has not submitted a request.
- d. Equipment Leaks** - see §63.7920(a), which requires the following; and the applicable requirements are identified as delineated:
- (b)(1), control equipment leaks (applicable requirements under 40 CFR Part 63, Subpart TT - National Emission Standards for Equipment Leaks—Control Level 1), **applicable**. (b)(2), control equipment leaks (applicable requirements under 40 CFR Part 63 Subpart UU - National Emission Standards for Equipment Leaks—Control Level 2), not applicable.
 - (c), for a closed vent system, **applicable**. Siegwerk elected to meet the requirements in §§63.7925 through 63.7928 that apply instead of standards in §63.1015 or §63.1034.
 - (d) allows alternative work practice standards per EPA approval. Siegwerk has not submitted a request.
- e. Closed Vent Systems and Control Devices** - see §63.7925(a)¹⁷, which requires the following; and the applicable requirements are identified as delineated:
- (b), exemptions for not operating the control device, **applicable**
 - (c), closed vent system, the standards in §63.693(c), **applicable**
 - (d)(1), control HAP emissions by reducing total HAP or TOC by 95%, **applicable**; (d)(2) limit the concentration of total HAP or TOC to 20 ppmv or less on a dry basis corrected to 3 percent oxygen, not applicable.
 - (e), flare as a control device, not applicable
 - (f), process heater or boiler as a control device, not applicable
 - (g), operating limits for control devices. *Only (g)(5)*, catalytic incinerator, is **applicable** (i.e., maintain the daily average temperature difference across the catalyst bed greater than or equal to the minimum temperature difference established during the performance test or design evaluation).
 - (h), carbon adsorption system, not applicable
 - (i), catalyst bed replacement, **applicable**
 - (j) allows alternatives work practice standards per EPA approval. Siegwerk

¹⁷ §63.7925(a) contains “§§63.7890 through 63.7922, as applicable to your affected sources”; however, §63.7890 addresses Process Vents, which the facility does not have (see Attachment A of the SOB). Therefore, the T5 condition lists “§§63.7895 through 63.7922”

has not submitted a request.

Inspection and Monitoring

16. Applicable inspection and monitoring requirements from Subpart GGGGG are addressed by the following (Note: The subpart has none of these requirements for “equipment leaks”.):

- a. Tanks** - §63.7897 requires the following; and the applicable requirements are identified as delineated:
 - (a), using Tank Level 1 controls (i.e., MACT Subpart TT), *applicable*
 - (b), using Tank Level 2 controls, not applicable
- b. Separators** - §63.7912 requires the following; and the applicable requirements are identified as delineated:
 - (a), use of floating roof, not applicable
 - (b), use of cover vented to control device, all of (b) is *applicable*: Visually inspect the cover, and monitor and inspect the closed vent system.
 - (c), use of pressurized separator, not applicable
- c. Transfer Systems** - §63.7917 requires the following; and the applicable requirements are identified as delineated:
 - (a), individual drain system according to §63.7915(b), *applicable*
 - (b), using covers according to §63.7915(c)(1), not applicable
 - (c), hard piping according to §63.7915(c)(2), *applicable*
 - (d), enclosed and vented to a control device according to §63.7915(c)(3), *applicable*
 - (e) is *applicable*, subject to paragraph (c) or (d) must repair defects.
- d. Closed Vent Systems and Control Devices** - §63.7927 requires the following; and the applicable requirements are identified as delineated:
 - (a), *applicable*
 - (b) and (c), regenerable carbon adsorption system, not applicable
 - (d), condenser, not applicable
 - (e), thermal incinerator, not applicable
 - (f), catalytic incinerator, *applicable*
 - (g), boiler or process heater, not applicable
 - (h), flare, not applicable
 - (i), boiler or process heater, not applicable
- e. Monitoring, Installation, Operation, and Maintenance of CPMS** - All of §63.7945 is applicable and monitoring alternatives are allowed by §63.7947. However, Siegwerk did not identify this as an applicable requirement.

The applicable monitoring and recordkeeping requirements from Subpart GGGGG are included in the Title V permit, which is sufficient to assure compliance with Subpart GGGGG.

Recordkeeping

17. Specific records are required by §63.7952, and in the form and time period required by §63.7953 (a), (b), (c) and (d) as delineated below. **T5 No. 11** (*Condition 12* of NSR 3/23/11 permit) also contains recordkeeping requirements (specific records, format and time period) for the Soil Vapor Extraction and Groundwater Recovery System as identified below.

- §63.7953(a) – The form suitable and readily available for expeditious review, as specified in §63.10(b)(1). Note: *Condition 12 requires the content and format of records be arranged with the Director, Blue Ridge Regional Office.*
- §63.7953(b) – Kept for 5 years after the date of each occurrence, measurement, maintenance corrective action, report, or record. Note: *Condition 12 requires records to be current for the most recent 5 years.*
- §63.7953(c) – Each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). Records for the remaining 3 years can be kept off-site. Note: *Condition 12* requires the permittee to “maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit” and the records shall be available for inspection by the DEQ and shall be current for the most recent five years.
- §63.7953(d) also allows the records to be kept off-site the remaining three years if the remediation activity is completed, there is no other remediation activity at the facility, and you are no longer the owner of the facility, provided you notify the Administrator in writing of the name, address and contact person for the off-site location.

40 CFR 63 Subpart A has recordkeeping requirements applicable to Siegwerk as stated in Subpart GGGG’s Table 3 (e.g., initial notifications). **T5 No. 28** addresses Subpart A and Table 3.

Initial Compliance

18. The initial compliance demonstrations have been completed. However, this requirement is included in the **T5** for any potential future initial demonstrations (e.g., new tank) of the following:

- a. Tanks - §63.7896.
- b. Separators - §63.7911.
- c. Transfer systems - §63.7916.
- d. Equipment leaks - §63.7921.
- e. Closed vent systems and control devices - §63.7926.
- f. General Standards - §63.7937(a), (c) through (d) may be applicable; (b) addresses process vents and therefore, is not applicable.

Continuous Compliance

19. Continuous compliance for emissions limitations and work practice standards from Subpart GGGGG are addressed by the following:

- a. For tanks - §63.7898(a) requires the following; and the applicable requirements are identified as delineated:
 - (b)(1) through (b)(3) Tank 1 controls, **applicable**
 - (c)(1) through (c)(5), Tank 1 controls, **applicable**
 - (d) through (h), Tank 2 controls, not applicable
- b. For separators - §63.7913(a) requires the following; and the applicable requirements are identified as delineated:
 - (b), for floating roof, not applicable
 - (c) fixed roof, **applicable**
 - (d), for pressurized, not applicable
- c. For transfer systems - §63.7918(a) requires the following; and the applicable requirements are identified as delineated:
 - (b), drain system using controls according to §63.7915(b), **applicable**
 - (c), using covers according to §63.7915(c)(1), not applicable
 - (d), hard piping according to §63.7915(c)(2), **applicable**
 - (e), enclosed and vented to a control device, **applicable**
- d. Equipment leaks - §63.7922(a) requires the following; and the applicable requirements are identified as delineated:
 - (b), control equipment leaks according to the requirements under §63.7920(b)(1), not applicable
 - (c), control equipment leaks according to the requirements under §63.7920(b)(2), **applicable**
 - (d), records to demonstrate compliance, **applicable**
- e. Closed vent systems and control devices - §63.7928(a) requires the following; and the applicable requirements are identified as delineated:
 - (b)(2), (b)(3) through (b)(5) and (b)(7), closed vent system work practice standards, **applicable**; (b)(1) (is for a closed vent system designed to operate with no detectable organic emissions), and (b)(6) (is for a closed vent system is equipped with a flow indicator), not applicable.
 - (c), control device subject to the emissions limits in §63.7925(d)(1)¹⁸, **applicable**
 - (d), control device subject to operating limits in §63.7925(g), **applicable**
 - (e), (f) and (g), spent carbon replacement, not applicable
 - (h), catalyst replacement, **applicable**
 - (i) and (j), flare, not applicable

¹⁸ §63.7928(c) identified as not applicable by Siegwerk. However, §63.7928(c) references §63.7925(d)(1) and (d)(2); and §63.7925(d)(1) is identified as applicable by Siegwerk.

- f. General Standards - §63.7938(a) requires the following; and the applicable requirements are identified as delineated.
- (b), process vents, not applicable
 - (c)(1), remediation material, **applicable** - the remediation material management unit uses air pollution controls according to the standards specified in §63.7886(b)(1); and (c)(2) through (6) not applicable because the unit is not:
 - (2) storing material with an average total VOHAP concentration less than 500 ppmw
 - (3) subject to another subpart under 40 CFR part 61 or 63
 - (4) an open tank or surface impoundment
 - (5) used for cleanup of radioactive mixed waste
 - (6) exempted according to 63.7886(d)
 - (d), equipment leaks, **applicable**
- g. Monitor and data collection - §63.7946, all is **applicable**

General Compliance

20. General requirements from Subpart GGGGG – All of §63.7935 is **applicable** as delineated below. This includes develop a written SSM Plan and operate and maintain the continuous monitoring system according to the site-specific VOC Monitoring Plan¹⁹.
- (a) - Comply with emissions limitations (including operating limits) and the work practice standards at all times, except during periods of startup, shutdown, and malfunction
 - (b) - Always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
 - (c) - Develop a written SSM Plan.
 - (d) - Reserve
 - (e) - Report each instance in which you did not meet each emissions limitation and each operating limit that applies to you.
 - (f) - Deviation during SSM.
 - (g) - Develop and make available for inspection by the permitting authority, upon request, a site-specific monitoring plan that addresses listed items.
 - (h) - Address listed items in the site-specific monitoring plan.
 - (i) - Operate and maintain the continuous monitoring system according to the site-specific monitoring plan.
 - (j) - Conduct a performance evaluation of each continuous monitoring according to the site-specific monitoring plan.
21. Requirement addressing transferring remediation material off-site per §63.7936. This is included in the **T5** as a potential future requirement. Remediation material is not currently being transferred off-site.

¹⁹ Siegwerk submitted to the DEQ an updated Monitoring Plan.

Performance Tests

Initial performance tests and other initial compliance demonstrations have been completed; however, the requirements for new sources are included in the following **T5** conditions for any potential future initial demonstrations:

- 22.** Initial performance tests and other initial compliance demonstrations.
- 23.** Subsequent performance tests for the purpose of Subpart GGGGG must be conducted at any time the EPA requires according to §63.7(3).
- 24.** Determining average VOHAP concentration of the remediation material.
- 25.** Determining maximum HAP vapor pressure of the remediation material.

Reporting

There are also reporting requirements from 40 CFR 63 Subpart A that are applicable to Siegwerk as stated in Subpart GGGGG's Table 3 (See **T5 No. 28** - e.g., testing, SSM).

- 26.** Reports - §63.7951.

Notifications

There are also notification requirements from 40 CFR 63 Subpart A that are applicable to Siegwerk as stated in Subpart GGGGG's Table 3 (See **T5 No. 28** - e.g., when using CMS).

- 27.** Notifications - §63.7950. The initial notification has been completed; however, the requirement is included in the T5 to address future notifications (e.g., pending performance tests). All of §63.7950 is applicable except for:
 - (b) Applies to sources with start up before 10/8/03.
 - (f) Alternate standard, not selected by Siegwerk.

General Provisions of Subpart A

- 28.** Applicable requirements of 40 CFR Subpart A - §63.7955 (Table 3 of Subpart GGGGG). Please note the following:

- The applicable requirements include, but not limited to, the following; and may be similar to other **T5** conditions:
 - Notifications (**T5**)
 - Reports (**T5**)
 - Records (**T5**)
 - General duty to minimize emissions (**T5**).
 - Plans, as required by:
 - §63.6(e)(3) requires a Startup, Shutdown, and Malfunction (SSM) Plan
 - §63.8(c) addresses *Operation and maintenance of continuous monitoring system; with* §63.8(c)(iii) requiring “The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan for CMS as specified in §63.6(e)(3)”
 - §63.8(d) requires a CMS Quality Control program to be developed and implemented, if the affected source that is required to use a CMS and

is subject to the monitoring requirements of this section and a relevant standard. Each quality control program shall include, at a minimum, a written protocol that describes procedures as stated in §63.8(d)(2). §63.8(d)(3) states the recordkeeping requirements.

- The SSM exemptions listed in Table 3 (i.e., §63.6(f)(1) and (h)(1)) were vacated by the Court issued a mandate vacating these SSM exemption provisions and are no longer allowed²⁰.

FACILITY WIDE CONDITIONS

The following are facility wide requirements²¹:

29. NSR Condition 17 - Maintenance/operating procedures.

30. NSR Condition 20 - Violation of ambient air quality standard.

STREAMLINED REQUIREMENTS

No streamlined requirements identified.

INSIGNIFICANT EMISSION UNITS

No insignificant emission units identified in the application. All emissions units are subject to the MACT Subpart GGGGG. “None” is listed in **T5 No. 31 Insignificant Emission Units**.

PERMIT SHIELD AND INAPPLICABLE REQUIREMENTS

The renewal application did not identify any inapplicable requirements, except those conditions in the **6/21/12 T5** referencing the 2/5/03 permit. As previously discussed the conditions from the 2/5/03 permit are not included in the **T5**. Therefore, there are no requirements identified in **T5 32**.

²⁰ The following was provided in the EPA’s Notice Of Delegation Of Authority that appeared in the Federal Register on 7/06/15:

“Please note that on December 19, 2008, in *Sierra Club v. EPA*², the United States Court of Appeals for the District of Columbia Circuit vacated certain provisions of the General Provisions of [40 CFR part 63](#) relating to exemptions for startup, shutdown, and malfunction (SSM). On October 16, 2009, the Court issued a mandate vacating these SSM exemption provisions, which are found at [40 CFR 63.6\(f\)\(1\)](#) and (h)(1).

Accordingly, EPA no longer allows sources the SSM exemption as provided for in the vacated provisions at [40 CFR 63.6\(f\)\(1\)](#) and (h)(1), even though EPA has not yet formally removed these SSM exemption provisions from the General Provisions of [40 CFR part 63](#). Because Virginia incorporated [40 CFR part 63](#) by reference, Virginia should also no longer allow sources to use the former SSM exemption from the General Provisions of [40 CFR part 63](#) due to the Court’s ruling in *Sierra Club v. EPA*.

² *Sierra Club v. EPA*, 551 F.3rd 1019 (D.C. Cir.2008)”

²¹ The **6/21/12 T5** (Condition V.A.1) list the State regulatory visible emissions limit for new sources, with the clarification of “unless otherwise specified in this permit”, which is the 5 percent opacity limit from the thermal catalytic oxidizer (**T5 4**). Because the only potential source of visible emissions from the remediation system is the thermal catalytic oxidizer the “new source” visible emissions limit is not included in the new **T5**.

GENERAL CONDITIONS²²

The permit contains general conditions (**T5 No. 33 through No.69**) required by 40 CFR Part 70 and 9VAC5-80-110 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. In the event that the Title V Permit General Conditions are the same as the January 24, 2007 State Operating Permit General Conditions, the Title V Permit includes both regulatory citations. Comments on specific general conditions are provided as delineated below:

Permit Expiration – T5 No. 34 through No. 39

These conditions refer to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

Failure/Malfunction Reporting – T5 No. 45

Section 9VAC5-20-180²³ requires malfunction and excess emission reporting within four hours

²² The four Title V boilerplate general permit conditions addressing Malfunction as an Affirmative Defense are not included in the Title V permit due to the regulatory change related to SSM SIP Call which is effective June 1, 2016.

²³ Effective June 1, 2016 9VAC5-20-180 C and 9VAD5-20-180 G are amended (see below) to remove an impermissible affirmative defense from the malfunction. Therefore, T5 General Condition addressing “Failure/Malfunction Reporting” (i.e., No. 60) is revised to read as stated in the T5.

9VAC5-20-180 C. In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, ~~as soon as practicable but~~ (i) no later than four daytime business hours after the malfunction is discovered, notify the board ~~by facsimile transmission, telephone or telegraph~~ of such failure or malfunction and shall (ii) ~~within two weeks~~ 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown and the demonstrations in subsection G of this section. Owners subject to the requirements of 9VAC5-40-50 C and 9VAC5-50-50 C are not required to provide the written statement prescribed in this subsection for facilities subject to the monitoring requirements of 9VAC5-40-40 and 9VAC5-50-40. When the condition causing the failure or malfunction has been corrected and the facility or control equipment is again in operation, the owner shall notify the board.

9VAC5-20-180 G. ~~No violation of applicable emission standards or monitoring requirements shall be judged to have taken place~~ In accordance with subsection C of this section, if the excess emissions or cessation of monitoring activities is due to a malfunction, ~~provided that~~ the owner may demonstrate the following:

1. The cause of the excess emissions or cessation of monitoring activities meets the definition of malfunction provided in 9VAC5-10-20;

~~2.~~ 2. The procedural requirements of this section were met or the owner has submitted an acceptable application for a variance, which is subsequently granted;

~~3.~~ 3. The owner has taken expeditious and reasonable measures to minimize emissions during the breakdown period;

of discovery. Section 9VAC5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. Section 9VAC5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9VAC5-20-180 and 9VAC5-80-250. The report must be made within four daytime business hours of discovery of the malfunction. The facility is subject to 9VAC5-50-50 C for new source.

Permit Modification – T5 No. 49

This general condition cites the sections that follow:

9VAC5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9VAC5-80-190. Changes to Permits

9VAC5-80-260. Enforcement

9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9VAC5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Asbestos Requirements – T5 No. 70

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

GREENHOUSE GAS (GHG) EMISSIONS

GHG permitting requirements have not been identified for the emissions units at this facility.

STATE ONLY APPLICABLE REQUIREMENTS

There are no state only requirements in the Title V permit.

FUTURE APPLICABLE REQUIREMENTS

No future applicable requirements identified²⁴.

~~3.~~ 4. The owner has taken expeditious and reasonable measures to correct the malfunction and return the facility to a normal operation; and

~~4.~~ 5. The source is in compliance with related applicable emission standards or monitoring requirements at least 90% of the operating time over the most recent 12-month period.

²⁴ However, potential future requirements from 40 CFR 63 Subpart GGGGG are listed in the Title V permit (e.g., **T5 No. 18** initial notification for new equipment).

COMPLIANCE PLAN

None

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Lynchburg Daily Advance from June 28, 2016 to July 28, 2016. No comments received during the comment period.

CHANGES TO PROPOSED DRAFT PERMIT

As stated above, comments were not received during the public comment period. However, US EPA made suggestion concerning monitoring of temperatures as required by Condition 8 and the reference to the Subpart's GGGGG monitoring requirements as referenced in Condition 16.d. As a result changes were made to Condition 16 as delineated below, with "f" being the previous "e":

- d. For each closed vent system ~~and control device~~ you must comply with the requirements in §63.7927(a) ~~closed vent system and control device as required by and (f).~~
(§63.7927)
- e. For a catalytic incinerator you must use a CPMS with two temperature sensors to measure and record the hourly average temperature at the inlet of the catalyst bed, the hourly average temperature at the outlet of the catalyst bed, the hourly average temperature difference across the catalyst bed, and to determine and record the daily average temperature difference across the catalyst bed.
(§63.7927(f)).
- f. Monitoring installation, operation, and maintenance for each CPMS as required by §63.7945.

The above changes are considered clarification to monitoring requirements and do not result in a change to applicable federal enforcement requirements.

ATTACHMENTS

Attachment A - 40 CFR 63 Subpart GGGGGG – Applicable Requirement Summary

Attachment A of the SOB for Siegwerk USA Co. (Permit No. BRRO- 21535) 40 CFR 63 Subpart GGGGG Applicability Summary

Please note the following:

1. The summary is presented by the Subpart GGGGG Table of contents, with
 - a. **Yellow highlight** – Identifies applicable requirements to be included in the Title V permit
 - b. **Light blue highlight** – Identifies items not included in the Title V because one or more of the following (Note: The reason may not be listed for every highlighted item.):
 - requirement completed (e.g., initial notification)
 - does not apply (e.g., no surface impoundment)
 - does not need to be included in the Title V permit because it's a requirement that does not need compliance certification by the facility (e.g., purpose of the subpart, enforcement of the subpart)
 - alternate standard not identified as being applicable
2. DEQ's comments concerning the applicability, current status (i.e., item completed – e.g., initial notification), etc. are in *italic font*.
3. Information provided by Siegwerk (i.e., AECOM on behalf of Siegwerk – see Mr. James Spencer's April 20, 2016 email) is in red underlined font.

What This Subpart Covers

§63.7880 What is the purpose of this subpart?

§63.7881 Am I subject to this subpart?

§63.7882 What site remediation sources at my facility does this subpart affect?

§63.7883 When do I have to comply with this subpart?..*Compliance date has passed.*

General Standards

§63.7884 are the general standards I must meet for each site remediation with affected sources?

(a)

§63.7885 are the general standards I must meet for my affected process vents? Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.

(a) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.

(b) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.

(c) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.

§63.7886 are the general standards I must meet for my affected remediation units?

(a)

(b) The material managed has a concentration greater than 500 ppmw, and therefore standards in paragraph (b)(1) apply. Applicable standards are for tanks §63.7895 through §63.7898, oil-water separator in §63.7910 through §63.7913, transfer system in §63.7915 through §63.7918.

(c) *Not applicable*

(d) Not applicable. None of the remediation material management units have been determined to be exempted from the requirements in paragraph (b) of this section.

§63.7887 are the general standards I must meet for my affected equipment leak sources?

(a)

(b) *Not applicable*

§63.7888? How do I implement this rule at my facility using the cross-referenced requirements in other subparts

Process Vents – *Not applicable*

§63.7890 What emissions limitations and work practice standards must I meet for process vents?

(a) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.

(b) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.

(c) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.

§63.7891 How do I demonstrate initial compliance with the emissions limitations and work practice standards for process vents? §63.7892 What are my inspection and monitoring requirements for process vents?

§63.7893 How do I demonstrate continuous compliance with the emissions limitations and work practice standards for process vents?

Tanks

§63.7895 What emissions limitations and work practice standards must I meet for tanks?

Determined the maximum HAP vapor pressure (kPa) of remediation material placed in each tank using methods specified in §63.7944. Vapor pressure calculated for AWS1/AWS2 is 10.62 kPa and for PT1 is 2.40 kPa based on calculations for Form 7 air permit application. Per Table 2 in subpart, tank design capacity is less than 38m³ and max HAP vapor pressure is than 76.6kPa, tanks must use Level 1 controls under §63.7895(b).

(a)

(b)

(c) Using Tank Level 1 controls with fixed roof tanks. Operate fixed roof tanks per §63.902 that is connected by a closed-vent system that is vented to a control device (catalytic oxidizer).

(d) Not applicable. Tank Level 1 controls are used.

(e) Not applicable. Alternative to work practice standards not requested.

§63.7896 How do I demonstrate initial compliance with the emissions limitations and work practice standards for tanks? Demonstration for fixed roof tanks using Tank Level 1 controls by paragraphs (b)(1) and b(2) and paragraphs (c)(1) through (c)(3). Initial compliance demonstration completed.

§63.7897 What are my inspection and monitoring requirements for tanks?

- (a) Applicable. Facility is using Tank Level 1 controls.
- (b) Not Applicable. Facility is not using Tank Level 2 controls.

§63.7898 How do I demonstrate continuous compliance with the emissions limitations and work practice standards for tanks?

- (a)
- (b)
- (c)
- (d) *Not identified by Siegwerk as being used to demonstrate compliance.*
- (e) *Not identified by Siegwerk as being used to demonstrate compliance.*
- (f) *Not identified by Siegwerk as being used to demonstrate compliance.*
- (g) *Not identified by Siegwerk as being used to demonstrate compliance.*
- (h) *Not identified by Siegwerk as being used to demonstrate compliance.*
- (i) *Not identified by Siegwerk as being used to demonstrate compliance.*

Containers – Not applicable.

§63.7900 What emissions limitations and work practice standards must I meet for containers?

§63.7901 How do I demonstrate initial compliance with the emissions limitations and work practice standards for containers?

§63.7902 What are my inspection and monitoring requirements for containers?

§63.7903 How do I demonstrate continuous compliance with the emissions limitations and work practice standards for containers?

Surface Impoundments – Not applicable.

§63.7905 What emissions limitations or work practice standards must I meet for surface impoundments?

§63.7906 How do I demonstrate initial compliance with the emissions limitations or work practice standards for surface impoundments?

§63.7907 What are my inspection and monitoring requirements for surface impoundments?

§63.7908 How do I demonstrate continuous compliance with the emissions limitations and work practice standards for surface impoundments?

Separators

§63.7910 What emissions limitations and work practice standards must I meet for separators?

- (a)
- (b) Option in paragraph (b)(2) used.
- (c) Not applicable. Alternative to work practice standards not requested.

§63.7911 How do I demonstrate initial compliance with the emissions limitations and work practice standards for separators? *Initial compliance demonstration completed.*

- (a)
- (b) Not applicable. Separator does not use floating roof.
- (c) Requirements in paragraphs (c)(1) through (c)(4) are applicable.

(d) Not applicable. Pressurized separator is not used.

§63.7912 What are my inspection and monitoring requirements for separators?

(a) Not applicable. Separator does not use floating roof.

(b) Paragraphs (b)(1) and (b)(2) are applicable.

(c) Not applicable. Pressurized separator is not used.

§63.7913 How do I demonstrate continuous compliance with the emissions limitations and work practice standards for separators?

(a)

(b) Not applicable. Separator does not use floating roof.

(c) Requirements in paragraphs (c)(1) through (c)(6) are applicable.

(d) Not applicable. Pressurized separator is not used.

Transfer Systems

§63.7915 What emissions limitations and work practice standards must I meet for transfer systems?

(a)

(b) Applicable.

(c) Requirements in paragraphs (c)(2) and (c)(3) are applicable.

(d) Not applicable. Alternative to work practice standards not requested.

§63.7916 How do I demonstrate initial compliance with the emissions limitations and work practice standards for transfer systems? *Initial compliance demonstration completed.*

(a)

(b) Requirements in paragraph (b) are applicable.

(c) Not applicable.

(d) Requirements in paragraph (d) are applicable.

(e) Requirements in paragraph (e) are applicable.

§63.7917 What are my inspection and monitoring requirements for transfer systems?

(a) Requirements in paragraph (a) are applicable.

(b) Not applicable.

(c) Requirements in paragraph (c) are applicable.

(d) Requirements in paragraph (d) are applicable.

(e) Requirements in paragraph (e) are applicable.

§63.7918 How do I demonstrate continuous compliance with the emissions limitations and work practice standards for transfer systems?

(a)

(b) Requirements in paragraph (b) are applicable.

(c) Not applicable.

(d) Requirements in paragraph (d) are applicable.

(e) Requirements in paragraph (e) are applicable.

Equipment Leaks

§63.7920 What emissions limitations and work practice standards must I meet for equipment leaks?

- (a)
- (b) Requirements in paragraph (b)(1) are applicable. [Note: (b)(2) is not applicable.]
- (c) Electing to meet requirement in §§ 63.7925 through 63.7928 that apply to closed vent system and control device.
- (d) Not applicable. Alternative to work practice standards not requested.

§63.7921 How do I demonstrate initial compliance with the emissions limitations and work practice standards for equipment leaks? *Initial compliance demonstration completed.*

- (a)
- (b) Not applicable.
- (c) Requirements in paragraph (c) are applicable.

§63.7922 How do I demonstrate continuous compliance with the work practice standards for equipment leaks?

- (a)
- (b) Not applicable
- (c) Requirements in paragraph (c) are applicable.
- (d)

Closed Vent Systems and Control Devices

§63.7925 What emissions limitations and work practice standards must I meet for closed vent systems and control devices?

- (a)
- (b)
- (c)
- (d) Applicable. Emission limit in (d)(1) is applicable.
- (e)
- (f)
- (g)(5)
- (h)
- (i)
- (j) Not applicable. Alternative to work practice standards not requested.

§63.7926 How do I demonstrate initial compliance with the emission limitations and work practice Standards for closed vent systems and control devices? *Initial compliance demonstration completed.*

- (a)
- (b)
- (c) Not applicable addresses closed vent system
- (d) Due the ongoing remedial progress at the facility, the extracted vapor concentrations from system operations will continue to decline over time resulting in decreasing influent levels of toluene (gas) entering the catalytic oxidizer for treatment. This will result in corresponding variations/decreases in the daily average temperature difference across the catalyst beds over time. It is therefore recommended that the operating limit for the catalytic oxidizer be based on

an average daily minimum inlet temperature before the dual catalyst beds rather than minimum temperature different across the catalyst beds. Performance testing of the catalytic oxidizer (2012-2014) and monthly performance evaluations of catalytic oxidizer destruction efficiency since June 2012 indicate on average a greater than 99% destruction efficiency occurring within a inlet temperature range of 696°F to 705°F (24 hour average). Based on the performance testing and performance evaluations conducted, a minimum daily inlet temperature limit of 690°F is proposed for the operating limit.

[DEQ note: §63.7925(g)(5) of Subpart GGGGG states “the daily average temperature difference across the catalyst bed greater than or equal to the minimum temperature difference established during the performance test or design evaluation”. Subpart GGGGG does not provide the proposed inlet temperature as an alternative compliance demonstration. Therefore, US EPA approval of the “average daily minimum inlet temperature” rather than “the minimum temperature different across the catalyst beds” is required before Siegwerk’s recommendation can be included in the Title V permit or accepted by the VADEQ.]

(e) *Not applicable addresses carbon adsorption systems*

(f)

(g) *Not applicable - addresses flare*

(h) *Not applicable - addresses boiler or process heater*

§63.7927 What are my inspection and monitoring requirements for closed vent systems and control devices?

(a)

(b) *Not applicable*

(c) *Not applicable*

(d) *Not applicable*

(e) *Not applicable*

(f)

(g) *Not applicable*

(h) *Not applicable*

(i) *Not applicable*

§63.7928 How do I demonstrate continuous compliance with the emissions limitations and work practice standards for closed vent systems and control devices?

(a)

(b) Demonstrate by meeting requirements in paragraphs (b)(2), (b)(3), (b)(4), (b)(5), and (b)(7)

(c) *Applicable [NOTE: Identified as “not applicable” by Siegwerk; however, (d) below is identified by Siegwerk as being applicable; and 63.7928(c) cites “(d)(1) or (2)”.]*

(d)

(e) *Not applicable*

(f) *Not applicable*

(g) *Not applicable*

(h)

(i) *Not applicable*

(j) *Not applicable*

General Compliance Requirements

§63.7935 What are my general requirements for complying with this subpart?

§63.7936 What requirements must I meet if I transfer remediation material off-site to another facility?

- (a) Potentially applicable in the future.
- (b) Potentially applicable in the future.
- (c) Exemption from obtaining a Title V permit for accepting remediation material from a site remediation subject to Subpart GGGGG – facility has a Title V permit.

§63.7937 How do I demonstrate initial compliance with the general standards? *Initial compliance demonstration completed.*

- (a)
- (b) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.
- (c) Requirements in paragraph (c)(1) are applicable.
- (d) Requirements in paragraph (d) are applicable.

§63.7938 How do I demonstrate continuous compliance with the general standards?

- (a)
- (b) Not applicable. The Facility does not have process vents as defined in the subpart GGGGG.
- (c) Requirements in paragraph (c)(1) are applicable.
- (d) Requirements in paragraph (d) are applicable.

Performance Tests

§63.7940 By what date must I conduct performance tests or other initial compliance demonstrations? *Initial performance tests and compliance demonstration completed.*

- (a) *Not applicable*
- (b) *Completed for current equipment*
- (c) *Completed for current equipment*

§63.7941 How do I conduct a performance test, design evaluation, or other type of initial compliance demonstration? *Initial performance test, design evaluation and compliance demonstration completed.*

- (a) *Completed for current equipment*
- (b) *Completed for current equipment*
- (c) *Not applicable*
- (d)
- (e) *Not applicable*
- (f) Requirements in paragraph (f) are applicable.
- (g) Requirements in paragraph (g) are applicable.
- (h) *Not applicable*
- (i) Not applicable.
- (j) Not applicable.
- (k) Requirements in paragraph (k) are applicable.
- (l) *Not applicable*

(m) Completed for current equipment

§63.7942 When must I conduct subsequent performance tests?

§63.7943 How do I determine the average VOHAP concentration of my remediation material?

- (a) Method used is knowledge as described in paragraph (c)
- (b)
- (c)
- (d)

§63.7944 How do I determine the maximum HAP vapor pressure of my remediation material?

- (a) Determined by knowledge as described in paragraph (c)
- (b)
- (c)

Continuous Monitoring Systems

§63.7945 What are my monitoring installation, operation, and maintenance requirements?

§63.7946 How do I monitor and collect data to demonstrate continuous compliance?

§63.7947 What are my monitoring alternatives? Not applicable requirement this option should not be included in the Title V permit.

Notification, Reports, and Records

§63.7950 What notifications must I submit and when? *Notifications requirements of §63.7950 and Subpart A submitted for the new system.*

- (a) *Completed for current equipment*
- (b) *Not applicable - "existing"*
- (c) *Completed for current equipment*
- (d)
- (e)
- (f) Alternative standard not selected.

§63.7951 What reports must I submit and when?

§63.7952 What records must I keep?

§63.7953 In what form and how long must I keep my records?

Other Requirements and Information

§63.7955 What parts of the General Provisions apply to me?

§63.7956 Who implements and enforces this subpart?

§63.7957 What definitions apply to this subpart? *Note: Applicable definitions are applicable; and are included in the Title V permit by reference to the same extent as §63.7881 and §63.7882.*

Tables

Table 1 to Subpart GGGGG of Part 63—List of Hazardous Air Pollutants

Table 2 to Subpart GGGGG of Part 63—Control Levels as Required by §63.7895(a) for Tanks Managing Remediation Material With a Maximum HAP Vapor Pressure Less Than 76.6 kPa
Determined the maximum HAP vapor pressure (kPa) of remediation material placed in each tank using methods specified in §63.7944. Vapor pressure calculated for AWS1/AWS2 is 10.62 kPa and for PT1 is 2.40 kPa based on calculations for Form 7 air permit application. Per Table 2 in subpart, tank design capacity is less than 38m³ and max HAP vapor pressure is than 76.6kPa, tanks must use Level 1 controls under §63.7895(b).

Table 3 to Subpart GGGGG of Part 63—Applicability of General Provisions to Subpart GGGGG per §63.7955 [*DEQ Note: The SSM exemption provisions of §63.6(f)(1) and (h)(1), which are no longer allowed due to United States Court of Appeals for the District of Columbia Circuit ruling in Sierra Club v. EPA, 551 F.3rd 1019 (D.C. Cir.2008)*].