



Colorado Department of Public Health and Environment

OPERATING PERMIT

Intertape Polymer Corporation (IPG) – Brighton Plant

Issued: January 1, 2011
Last Revised: May 10, 2012

AIR POLLUTION CONTROL DIVISION COLORADO OPERATING PERMIT

FACILITY NAME: Brighton Plant OPERATING PERMIT NUMBER

FACILITY ID: 0010195

09OPAD337

ISSUED: January 1, 2011

EXPIRATION DATE: January 1, 2016

MODIFICATIONS: See Appendix F of Permit

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. and applicable rules and regulations.

ISSUED TO:

PLANT SITE LOCATION:

Intertape Polymer Corporation (IPG)
3647 Cortez Road, W
Bradenton, FL 34210

Intertape Polymer Corporation (IPG)
1095 South Fourth Avenue
Brighton, CO 80601 -6744
Adams County

INFORMATION RELIED UPON

Operating Permit Application Received: July 28, 2009

And Additional Information Received:

Nature of Business: Manufacture of Pressure Sensitive Tape

Primary SIC: 2672

RESPONSIBLE OFFICIAL

Name: Mark Schwarz
Title: Operations Manager

FACILITY CONTACT PERSON

Name: Rick Carnell
Title: EHS Manager

Phone: (303) 479-3385

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SUBMITTAL DEADLINES

Semi-Annual Monitoring Period: January 1 – June 30, July 1 – December 31

Semi-Annual Monitoring Report: Due on August 1, 2011 & February 1, 2012 & subsequent years

Annual Compliance Period: January 1 - December 31

Annual Compliance Certification: Due on February 1, 2012 and subsequent years

Note that the Semi-Annual Monitoring Reports and Annual Compliance Certifications must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports/certifications.

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SECTION I - General Activities and Summary

1. Permitted Activities

- 1.1 This source is classified as a manufacturer of pressure sensitive tape under Standard Industrial Classification 2672. A Title V permit (97OPAD183) was originally issued for this facility in July 1999. At that time the facility consisted of three coating lines, a film line and two boilers. The facility was shut down in 2006 due to market conditions and the permits cancelled. Intertape Polymer Corporation (IPG) decided to restart the facility and in August 2008, the facility was re-permitted as a major source for purposes of the Title V program. The current facility consists of one film line, one coating line and two natural gas fired boilers.

Film Line

In order to produce film, polypropylene beads are purchased and stored in silos. These beads are melted and formed into a sheet which is stretched lengthwise and then widthwise which accomplishes the orientation process. This film is slit for either internal use or to be sold to outside converting operations. The film line also has a polypropylene scrap recycling system that enables scrap film to be chopped for size reduction and recycled back into the process. The scrap recycling system uses a baghouse that vents inside the building to minimize dust. The film line consists of a polypropylene extruder, continuous web handling rollers, conveyors, a winder, ten oven zones (heated by nine (9) 0.5 mmBtu/hr and one (1) 1 mmBtu/hr natural gas-fired burners and two corona treaters).

Coating Line

At the coating line, plastic film is unwound from rolls and traverses through three separate coating stations where primer, adhesive and release coatings are applied, respectively. Each coating station is followed by a series of steam-heated ovens to dry and cure the coatings. Emissions from the coating stations and the associated dryers are captured via a permanent total enclosure and routed to an activated carbon bed solvent recovery system. The primer and release coatings use toluene as the solvent and the adhesive coating uses hexane and toluene as the solvents. The coatings used in the coating line are blended, mixed and prepared by IPG. The mixers, tanks and distillation column used at the facility are all vented to the carbon bed solvent recovery system. When the carbon beds reach their respective capacity for collection of solvent, they are stripped using steam and the solvent water mixture is recovered via condensation. The recovered solvent mixture is routed to a distillation column that separates toluene and hexane for subsequent reuse in the process.

Boilers

The boilers are used to provide steam for process heat at the facility. The larger boiler is used primarily for this purpose, with the smaller boiler used primarily on a stand-by basis.

The facility is located at 1095 S. Fourth Avenue, in Brighton. Brighton is located in Adams county, within the Denver Metro Area. The Denver metro area, including Brighton, is classified

as attainment/maintenance for particulate matter less than 10 microns (PM₁₀) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM₁₀ and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver metro area, including Brighton is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Colorado Regulation No. 7, Section II.A.1.

There are no affected states within 50 miles of the plant. Rocky Mountain National Park, a Federal Class I designated area is within 100 km of the facility.

- 1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.
- 1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this Operating Permit and shall survive reissuance. Any requirements that were designated in the Compliance Order on Consent (2003-011) issued December 2, 2003 as applicable requirements have been incorporated into this operating permit and shall survive reissuance as applicable requirements. This permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits: 08AD0168
- 1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Permit Condition Number(s): Section II - Conditions 1.8 (odor), 2.6 (NSPS General Provisions, S049 only) and 2.9 (opacity) and Section IV - Conditions 3.d, 3.g (last paragraph), 14 and 18 (as noted).
- 1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit.

2. Alternative Operating Scenarios

- 2.1 The permittee shall be allowed to make the following changes to its method of operation without applying for a revision of this permit.
 - 2.1.1 No separate operating scenarios have been specified.

3. Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD)

3.1 Based on the information provided by the applicant, this source is not categorized as a PSD major stationary source as of the issue date of this permit. Any future modification at this facility which is major by itself (i.e. Potential to Emit of ≥ 250 tons/year) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

In addition, future modifications at this facility may result in the facility being classified as a major stationary source for PSD. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part D, Section II.A.26 and 42) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

3.2 Based on the information provided by the applicant, this source is not categorized as a NANSR major stationary source as of the issue date of this permit. Any future modification at this facility which is major by itself (i.e. Potential to Emit of ≥ 100 tons/year of either NO_x or VOC) may result in the application of the NANSR review requirements.

In addition, future modifications at this facility may result in the facility being classified as a major stationary source for NANSR. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part D, Section II.A.26 and 42) for either NO_x or VOC may result in the application of the NANSR review requirements.

3.3 There are no other Operating Permits associated with this facility for purposes of determining the applicability of NANSR or PSD review regulations.

4. Accidental Release Prevention Program (112(r))

4.1 Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Compliance Assurance Monitoring (CAM)

5.1 The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV:

The coating line is not subject to CAM because the activated carbon bed solvent recovery system is considered inherent process equipment (the solvents are recovered and reused in the process), not a control device.

6. Summary of Emission Units

6.1 The emissions units regulated by this permit are the following:

Stack Identifier	AIRS Stack Number	Description	Startup Date ¹	Pollution Control Device
S007 thru S009	006	Coating Line	Original startup 1983/84 Re-started September 2008	Activated Carbon Bed Solvent Recovery System
S048	002	Cleaver Brooks, Model No. 700-800, Fire-Tube Steam Boiler, Rated at 33.48 mmBtu/hr, Serial No. OL-09511. Natural Gas Fired. Fire-Tube Boiler.	Original startup October 2005 Re-started October 2007	Uncontrolled
S049	007	Cleaver Brooks, Model No. 700-600, Fire-Tube Steam Boiler, Rated at 25 mmBtu/hr, Serial No. L-84624. Natural Gas Fired.	Original startup 1988 Re-started October 2008	Uncontrolled
S051 thru S053, S055 thru S069, S061 & S062	005	Film Line	Original startup 1988 Re-started October 2007	Uncontrolled
	N/A	Cold Cleaner Solvent Vat		Uncontrolled

¹ In February 2007, IPG notified the Division that the coating lines had ceased operating in November 2006. In March 2007, IPG requested that the Title V operating permit and underlying construction permit be cancelled. The Division cancelled the Title V operating permit and underlying construction permit effective December 31, 2006.

SECTION II - Specific Permit Terms

1. S0007 thru S009 - Coating Line Equipped with Activated Carbon Solvent Recovery System

The equipment list that identifies the equipment that makes up the Coating Line 2 can be found in Appendix G. Any additions to this equipment list will require a permit modification.

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Facility wide VOC Emission limit	1.1.	N/A	99.4 tons/yr	See Condition 1.1	Recordkeeping and Calculation	Monthly
Coatings Used, Product Produced and Solvents Recovered	1.2.	N/A	N/A	N/A	Recordkeeping	Monthly
Activated Carbon Bed Solvent Recovery System	1.3.	Solvent recovery system shall be equipped with continuous monitors to record VOC concentration in outlet exhaust and accumulated solvent recovered.		N/A	See Condition 1.3.	
Permanent Total Enclosure (PTE)	1.4.	PTE shall meet EPA Method 204 requirements and shall be operated for its entire useful life.		N/A	See Condition 1.4.	
NSPS Subpart RR - VOC Emission Limits	1.5.	A. VOC Emissions Shall Not Exceed 0.2 lbs per lb of Coating Solids Applied OR B. Demonstrate That: 1. A Minimum of 90% Reduction in Overall VOC Emissions OR 2. A Minimum Reduction in Overall VOC Emissions per § 60.443(b)		N/A	Recordkeeping and Calculations per 40 CFR § 60.443	Monthly
NSPS Subpart A General Provisions	1.6.	N/A	N/A	N/A	As Required by NSPS General Provisions	Subject to NSPS General Provisions
Colorado Regulation No. 7 - Surface Coating Requirements	1.7.	VOC Emissions Shall Not Exceed 4.8 lbs per Gallon of Solids		N/A	Recordkeeping and Calculation	Daily (compliance calculations may be conducted at the end of the month)
		VOC Concentration from outlet shall be monitored continuously			Continuous Monitoring System	Continuously

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Odor – State-Only Requirement	1.8.	As Specified in Colorado Regulation No. 2, Part A		N/A	Recordkeeping, Work Practices	As Defined
MACT Subpart JJJJ Requirements	1.9.	No more than 5% of the organic HAP applied for each month (95% reduction) OR No more than 4 % of the mass of coating materials applied for each month OR No more than 20 % of the mass of coating solids applied for each month		N/A	Liquid-Liquid Material Balance	Monthly

- 1.1 Facility wide emissions of Volatile Organic Compounds (VOC) shall not exceed the limitations stated above (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 to remove the monthly limits). Monthly VOC emissions from each coating line will be calculated by the end of the subsequent month using the following equation:

$$\text{tons/month} = [(\text{VOC content of coating})(\text{monthly quantity of coating used}) - \text{Monthly Quantity of VOC recovered} - \text{Quantity of VOC retained in product}] / 2000 \text{ lbs/ton}$$

Monthly emissions from the coating line shall be used as specified in Condition 4.1 to monitor compliance with the facility wide VOC emission limitation.

Documentation to support the quantity of VOC retained in the product shall be made available to the Division. This documentation should include analytical data that demonstrates retention of VOC and the methodology used to determine VOC retention based on analytical data and dried coating weight. Significant changes in coating formulations and/or dried coating weight shall require additional analytical data to determine the quantity of VOC retained in the product.

The VOC content of the compound should be based on either the manufacturer’s information or EPA Reference Method 24. In cases where discrepancies exist between manufacturer’s data and Method 24, the Method 24 data will govern.

- 1.2 Coatings Used, Product Produced and Solvents Recovered shall be monitored and recorded monthly and shall be made available to the Division upon request. Monthly usage, product produced and solvents recovered shall be used to monitor compliance with the VOC emission limitation specified in Condition 1.1.
- 1.3 The coating line shall be equipped with an activated carbon bed solvent recovery system to reduce VOC emissions (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 to remove the percent reduction requirement). The following requirements apply to the activated carbon bed solvent recovery system:

- 1.3.1 The activated carbon bed solvent recovery system shall be operated and maintained in accordance with manufacturer's recommendations and good engineering practices. Records of all inspections and maintenance activities shall be maintained and made available to the Division upon request.
- 1.3.2 The VOC concentration in the exhaust gas of the activated carbon bed solvent recovery system shall be monitored as required by Conditions 1.7.5 and 1.7.6.
- 1.3.3 Carbon testing on the carbon beds shall be conducted every five years to determine if replacement of carbon is necessary. Records of carbon testing shall be maintained and made available to the Division upon request.
- 1.3.4 The activated carbon bed solvent recovery system shall be regenerated on the last day of each month or after the last production day in the month to ensure that the solvent heel remains consistent, and to ensure that the solvent recovery efficiency calculated for each month (as required by Condition 1.5.4) is reflective of the amount of solvent recovered during the month.
- 1.3.5 The activated carbon bed solvent recovery system shall be equipped with a monitoring device to monitor the accumulated solvent recovered by the device over a calendar month period. Such device shall meet the requirements of Conditions 1.5.10 and 1.9.3. The monitoring device shall be operated and maintained in accordance with good engineering practices and shall be calibrated in accordance with manufacturer's procedures, on the schedule recommended by the manufacturer. Manufacturer's operating recommendations (including calibration schedule and procedures), records of any maintenance activities performed and documentation of calibrations shall be maintained and made available to the Division upon request. The accuracy of the monitoring device shall be verified annually. The verification method and associated documentation shall be maintained and made available to the Division upon request.
- 1.4 A permanent total enclosure (PTE) shall be installed around the coating line. The PTE shall be designed to meet the standards of U.S. Environmental Protection Agency ("EPA")'s Method 204 "Criteria for Verification of a Permanent or Temporary Total Enclosure". The PTE shall be operated for its entire useful life. (Compliance Order on Consent, No. 2003-11, Issued December 2, 2003, paragraphs 21 and 24)
- 1.5 The coating line is subject to 40 CFR Part 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, as adopted by reference in Colorado Regulation No. 6, Part A, as follows:
- Standards for Volatile Organic Compounds (§ 60.442)*
- 1.5.1 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:

- 1.5.1.1 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 (§ 60.442(a)(1)); **OR**
- 1.5.1.2 Demonstrate for each affected facility (§ 60.442(a)(2);
 - a. A 90 percent overall VOC emission reduction as calculated over a calendar month; **OR**
 - b. The percent overall VOC emission reduction specified in § 60.443(b) as calculated over a calendar month.

Compliance Provisions (§ 60.443)

- 1.5.2 To determine compliance with Condition 1.5.1.1 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 (§ 60.443(a)):
 - 1.5.2.1 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.
 - 1.5.2.2 Compute the weighted average using the equation in § 60.443(a)(2).
 - 1.5.2.3 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 Condition 1.5.1.1.
- 1.5.3 To determine compliance with Condition 1.5.1.2, the owner or operator shall calculate the required overall VOC emission reduction according to the equation in § 60.443(b). 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. (§ 60.443(b))
- 1.5.4 Where compliance with the emission limits specified in Condition 1.5.1.2 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 using the equation in § 60.443(c). If the R value is equal to or greater than the R_q value specified in Condition 1.5.3, then compliance with Condition 1.5.1.2 is demonstrated. (§ 60.443(c))
- 1.5.5 After the initial performance test required for all affected facilities under §60.8, compliance with the VOC emission limitation and percentage reduction requirements in Conditions 1.5.1.1 and 1.5.1.2 are 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. (§ 60.443(f))

The monthly compliance calculations shall be conducted by the end of the subsequent month.

- 1.5.6 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 using the procedures in § 60.443(h). (§ 60.443(h))
- 1.5.7 Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified in Condition 1.5.1.2 is being attained. (§ 60.443(j))

Monitoring of Operations and Recordkeeping (§ 60.445)

- 1.5.8 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 Condition 1.5.11 or the manufacturer's formulation data used for determining the VOC content of those coatings. (§ 60.445(a))
- 1.5.9 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. (§ 60.445(b))
- 1.5.10 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. (§ 60.445(c))

Test Methods and Procedures (§ 60.446)

- 1.5.11 The VOC content per unit of coating solids applied and compliance with the limitation in Condition 1.5.1.1 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. (§ 60.446(a))

Reporting Requirements (§ 60.447)

- 1.5.12 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 Conditions 1.5.1.1 and 1.5.1.2. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Division semiannually. (§ 60.447(b))

- 1.6 The coating line is subject to 40 CFR Part 60, Subpart A - General Provisions, as adopted by reference in Colorado Regulation No. 6, Part A, including but not limited to the following:
 - 1.6.1 No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere. (§ 60.12)
 - 1.6.2 Records of startups, shutdowns, and malfunctions shall be maintained, as required under § 60.7.
 - 1.6.3 At all times, including periods of startup, shutdown, and malfunction owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (§ 60.11(d)).
- 1.7 Volatile Organic Compound (VOC) emissions from the Coating Line are subject to the requirements in Colorado Regulation No. 7, Section XI (Colorado Construction Permit 08AD0168), as follows:
 - 1.7.1 VOC emissions from the coating line shall not exceed 4.8 lbs/gallon of solids (Colorado Regulation No. 7, Section IX.J, since a control device is used, the equivalent limit is included in the permit as specified in Section IX.A.5.f)

Compliance with the emission limitations shall be determined on a daily basis (Colorado Regulation No. 7, Section IX.A.10.a)

The permittee shall record material usage on a daily basis. However, daily compliance calculations for a given month may be conducted prior to the end of the subsequent month. For any day in which compliant coatings are not used, the monthly average solvent recovery efficiency, as determined by Condition 1.5.4 may be used in the compliance calculations.
 - 1.7.2 To determine compliance with applicable surface coating standards, samples shall be taken from the coating as freshly delivered to the reservoir of the coating applicator. (Colorado Regulation No. 7, Section XI.A.4)

- 1.7.3 Owners or operators of sources which use a carbon adsorption system shall provide for the proper disposal or reuse of all VOC recovered. (Colorado Regulation No. 7, Section IX.A.5.g)
- 1.7.4 The fugitive emission control requirements in Colorado Regulation No. 7, Section IX.A.7 apply, as follows:
- 1.7.4.1 Control techniques and work practices shall be implemented at all times to reduce VOC emissions from fugitive sources. Control techniques and work practices include, but are not limited to (Colorado Regulation No. 7, Section IX.A.7.a):
- a. tight-fitting covers for open tanks;
 - b. covered containers for solvent wiping cloths;
 - c. proper disposal of dirty cleanup solvent.
- 1.7.4.2 Emissions of organic material released during clean-up operations, disposal, and other fugitive emissions shall be included when determining total emissions, unless the source owner or operator documents that the VOCs are collected and disposed of in a manner that prevents evaporation to the atmosphere. (Colorado Regulation No. 7, Section IX.A.7.b)
- 1.7.5 If add-on control equipment is used, continuous monitors of the following parameters shall be installed, calibrated, and operated at all times that the associated control equipment is operating (Colorado Regulation No. 7, Section IX.A.8.a):
- 1.7.5.1 breakthrough of VOC on a carbon adsorption unit. (Colorado Regulation No. 7, Section IX.A.8.a.(iii))
- These monitoring devices shall be hooked up to a strip chart or data acquisition and handling system (DAHS). The monitoring devices shall be operated and maintained as required by the manufacturer and shall be calibrated daily using manufacturer's procedures.
- 1.7.6 If add-on control equipment is used, in addition to the in Condition 1.7.5, the following information and any other necessary information, as determined applicable for each source by the Division, shall be monitored and recorded daily in order to assure continuous compliance. The substitution of continuous recordings for daily recording may be allowed by the Division. (Colorado Regulation No. 7, Section IX.A.8.b)
- 1.7.6.1 For carbon adsorbers: bed temperature, accumulated time of operation, concentration of VOC in the outlet gas, solvent recovery. (Colorado Regulation No. 7, Section IX.A.8.b.(ii))
- The following parameters will be recorded daily: the bed temperature, the concentration of VOC from the continuous monitor required by Condition

1.7.5.1, the cumulative hours of operation for the solvent recovery device since the last carbon change and the quantity of solvents recovered.

- 1.8 **State-Only Requirement:** The coating line is subject to the Colorado Regulation No. 2, Part A Odor requirements. All Odor complaints shall be recorded and made available to the Division upon request. The source shall employ such measures and operating procedures as are necessary to minimize odor emissions.
- 1.9 The coating line is subject to 40 CFR Part 63, Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, as adopted by reference in Colorado Regulation No. 8, Part E, Section III, as follows:

Emission Standards (§ 63.3320)

- 1.9.1 If you own or operate any affected source that is subject to the requirements of this subpart, you must comply with these requirements on and after the compliance dates as specified in §63.3330 ((§ 63.3320(a)).

This unit is an existing source and its compliance date was December 5, 2005 per § 63.3330(a).

- 1.9.2 You must limit organic HAP emissions to the level specified in Conditions 1.9.2.1, 1.9.2.2 or 1.9.2.3 below:

1.9.2.1 No more than 5 percent of the organic HAP applied for each month (95 percent reduction) (§ 63.3320(b)(1)); or

1.9.2.2 No more than 4 percent of the mass of coating materials applied for each month at existing affected sources (§ 63.3320(b)(2)); or

1.9.2.3 No more than 20 percent of the mass of coating solids applied for each month (§ 63.3320(b)(3)).

The source must indicate one of the three emission limit options that will be used and notify the Division of that choice in the notification of compliance status and must monitor and report compliance results accordingly. If a source decides to change to other emission limit options, the Division must be notified in the semi-annual reports specified in Condition 1.9.8. The permittee has previously indicated that they would meet the limitation in Condition 1.9.2.3.

In addition, only the coating line is subject to the MACT, therefore, solvents recovered from the tanks and mixers shall not be used in demonstrating compliance with the MACT emission limitation.

Monitoring Requirements (§ 63.3350)

- 1.9.3 If you own or operate a solvent recovery unit to comply with the emission limitations and are demonstrating compliance with the emission standards in Condition 1.9.2

above through liquid-liquid material balance, you must install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device must be certified by the manufacturer to be accurate to within ± 2.0 percent by mass. (§ 63.3350(d)(2))

Performance Testing (§ 63.3360)

1.9.4 You are not required to conduct a performance test if the control device is a solvent recovery system and you comply by means of a monthly liquid-liquid material balance (§ 63.3360(b)(3))

1.9.5 The organic HAP content, volatile organic and coating solids content and volatile matter retained in the coated web or otherwise not emitted to the atmosphere shall be determined using the procedures specified in §§ 63.3360(c), (d) and (g), respectively.

Compliance Demonstrations (§ 63.3370)

1.9.6 If you use a solvent recovery device to control emissions, you must perform a monthly liquid-liquid material balance as specified in § 63.3370(i)(1). The monthly liquid-liquid material balance shall be performed as specified in paragraphs 63.3370(i)(1)(i) through (v) and use the applicable equations in paragraphs 63.3370(i)(1)(vi) through (ix) to convert the data in to units of the selected compliance option. Compliance is determined in accordance with paragraph 63.3370(i)(1)(x).

1.9.7 If compliance is determined in accordance with the provisions in § 63.3370(i)(1)(x)(D), the monthly allowable organic HAP emissions shall be determined as specified in § 63.3370(l).

Notification and Reports (§ 63.3400)

1.9.8 The permittee shall submit semi-annual compliance reports as required by § 63.3400(c) and startup, shutdown and malfunction reports as required by § 63.3400(g).

Records (§ 63.3410)

1.9.9 The permittee shall retain records as specified in §§ 63.3410(a) and (b).

General Provisions (§ 63.3340)

1.9.10 Table 2 to this subpart specifies the provisions of subpart A of this part that apply if you are subject to this subpart, such as startup, shutdown, and malfunction plans (SSMP) in §63.6(e)(3) for affected sources using a control device to comply with the

emission standards (§ 63.3340). The general provisions that apply to this source, include but are not limited to the following:

- 1.9.10.1 Prohibited activities in 40 CFR Part 60 Subpart A § 63.4.
- 1.9.10.2 Operation and maintenance requirements in 40 CFR Part 60 Subpart A § 63.6(e)(1).
- 1.9.10.3 Startup, shutdown and malfunction plan requirements in 40 CFR Part 60 Subpart A § 63.6(e)(3).
- 1.9.10.4 Performance test requirements in 40 CFR Part 60 Subpart A § 63.7.
- 1.9.10.5 Monitoring requirements in 40 CFR Part 60 Subpart A § 63.8.
- 1.9.10.6 Notification requirements in 40 CFR Part 60 Subpart A § 63.9.
- 1.9.10.7 Recordkeeping requirements in 40 CFR Part 60 Subpart A § 63.10.

2. S048 - Cleaver Brooks Boilers, Rated at 33.48 mmBtu/hr

S049 – Cleaver Brooks Boiler, Rated at 25 mmBtu/hr

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Facility Wide VOC Emissions	2.1.	N/A	99.4 tons/yr	5.5 lbs/mmSCF	Recordkeeping and Calculation	Monthly
NO _x	2.2.	N/A	14.38 tons/yr	100 lbs/mmSCF	Recordkeeping and Calculation	Monthly
CO		N/A	12.08 tons/yr	84 lbs/mmSCF		
Fuel Use	2.3.	N/A	288 mmSCF/yr	N/A	Fuel Meter	Monthly
Particulate Matter (PM)	2.4.	S048 – 0.201 lb/mmBtu S049 – 0.216 lb/mmBtu		N/A	Fuel Restriction	Only Natural Gas is Used As Fuel
RACT Requirements	2.5.	RACT is Determined to be Good Combustion Practices and Use of Natural Gas as Fuel		N/A	Certification	Annually
NSPS General Provisions State-Only for S049 Only	2.6.	N/A		NA	NA	As required in the General Provisions
Opacity	2.7.	Not to Exceed 20% Except as Provided for in 2.8 Below		N/A	Fuel Restriction	Only Natural Gas is Used As Fuel
Opacity	2.8.	For Certain Operational Activities- Not to Exceed 30% for a Period or Periods Aggregating More than Six (6) Consecutive Minutes in Any 60 Consecutive Minutes				
State-Only Opacity	2.9.	Not to Exceed 20%				
Boiler MACT Requirements (40 CFR Part 63 Subpart DDDDD)	2.10.	See Condition 2.10.		N/A	See Condition 2.10.	

2.1 Facility wide emissions of Volatile Organic Compounds shall not exceed the following limits (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 of this permit to remove the monthly limits). The emission factors listed above have been approved by the Division and shall be used to calculate VOC emissions from these units (EPA’s Compilation of Air Pollutant (AP-42) Emission Factors, dated March 1998, Section 1.4). Emissions shall be calculated by the end of the subsequent month using the above emission

factors, the monthly natural gas consumption (as required by Condition 2.3) in the following equation:

$$\text{tons/month} = \frac{[\text{EF (lbs/mmSCF)} \times \text{monthly natural gas consumption (mmSCF/mo)}]}{2000 \text{ lbs/ton}}$$

Monthly emissions from the boilers shall be used as specified in Condition 4.1 to monitor compliance with the facility wide VOC emission limitation.

- 2.2 Nitrogen Oxide (NO_x) and Carbon Monoxide (CO) emissions **from both boilers together** shall not exceed the following limits (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 of this permit to remove the monthly limits). The emission factors listed above have been approved by the Division and shall be used to calculate emissions from these units (EPA's Compilation of Air Pollutant (AP-42) Emission Factors, dated March 1998, Section 1.4, for small boilers). Emissions shall be calculated by the end of the subsequent month using the above emission factors, the monthly natural gas consumption (as required by Condition 2.3) in the following equation:

$$\text{tons/month} = \frac{[\text{EF (lbs/mmSCF)} \times \text{monthly natural gas consumption (mmSCF/mo)}]}{2000 \text{ lbs/ton}}$$

Monthly emissions shall be used in a twelve-month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

- 2.3 Natural gas consumption **for both boilers together** shall not exceed the limitations listed above (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 of this permit to remove the monthly limits). Natural gas consumed in the boilers shall be recorded monthly, as required by 40 CFR Part 60 Subpart Dc § 60.49(g)(2), as adopted by reference in Colorado Regulation No. 6, Part A. Monthly quantities of natural gas consumed shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month rolling total shall be calculated using the previous twelve months data.
- 2.4 Particulate Matter (PM) emissions **from each** boiler shall not exceed the short term limitation as stated in the above equation (Colorado Construction Permit 08AD0168 and Colorado Regulation No. 1, Section III.A.1.b). In the absence of credible evidence to the contrary, compliance with the particulate matter limit shall be presumed since only natural gas is permitted to be used as fuel for these boilers.

Note that the numeric PM standards were determined using the design heat input for the boilers (33.48 mmBtu/hr for S048 and 25 mmBtu/hr for S049) in the following equation:

$$\text{PE} = 0.5 \times (\text{FI})^{-0.26}, \quad \text{where:} \quad \begin{array}{l} \text{PE} = \text{particulate standard in lbs/MMBtu} \\ \text{FI} = \text{fuel input in MMBtu/hr} \end{array}$$

2.5 Reasonably Available Control Technology (RACT) applies to the boilers as follows:

2.5.1 **Each boiler** is subject to RACT requirements for VOC, CO and PM₁₀ emissions (Colorado Construction Permit 08AD0168, Colorado Regulation No. 7, Section II.C.2 (VOC only) and Colorado Regulation No. 3, Part B, Section II.D.2.a.).

2.5.2 **Boiler S049** is subject to RACT requirements for NO_x (Colorado Construction Permit 08AD0168 and Colorado Regulation No. 3, Part B, Section II.D.2.a.).

RACT has been determined to be good combustion practices (operation according to manufacturer specifications) and use of natural gas as fuel. The boilers shall be operated and maintained in accordance with the manufacturer's requirements and good engineering practices. Such procedures and preventative maintenance schedules shall be maintained and made available to the Division upon request.

2.6 **State-Only Requirement for S049 Only.** Regulation No. 6, Part A, Subpart A, General Provisions applies as follows:

2.6.1 No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere. (§ 60.12)

2.6.2 Records of startups, shutdowns, and malfunctions shall be maintained, as required under § 60.7(b).

2.6.3 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (§ 60.11(d)).

2.7 Except as provided for in Condition 2.8 below, opacity of emissions **from each boiler** shall not exceed 20% (Colorado Construction Permit 08AD0168 and Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for these boilers.

2.8 Opacity of emissions **from each boiler** during fire building, cleaning of fire boxes, soot blowing, start-up, process modifications, or adjustment or occasional cleaning of control equipment shall not exceed 30% for a period or periods aggregating more than six (6) consecutive minutes in any sixty (60) consecutive minutes (Colorado Construction Permit 08AD0168 and Colorado Regulation No. 1, Section II.A.4). In the absence of credible evidence to the contrary,

compliance with the 30% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for these boilers.

- 2.9 **State-Only Requirement:** No owner or operator may discharge, or cause the discharge into the atmosphere of any particulate matter which is greater than 20% opacity (Colorado Construction Permit 08AD0168 and Colorado Regulation No. 6, Part B, Section II.C.3). This opacity standard applies to **each boiler**. In the absence of credible evidence to the contrary, compliance with the 20% opacity requirement is presumed since only natural gas is permitted to be used as fuel for these boilers.

Note that this opacity standard applies at all times except during periods of startup, shutdown and malfunction (40 CFR Part 60 Subpart A § 60.11(c), as adopted by reference in Colorado Regulation No. 6, Part B, Section I.A).

Note that this opacity requirement is more stringent than the opacity requirement in Condition 2.8 during periods of building of a new fire, cleaning of fire boxes, soot blowing, process modifications and adjustment or occasional cleaning of control equipment.

- 2.10 These boilers are subject to the requirements in 40 CFR Part 63 Subpart DDDDD “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters”. These boilers shall meet the requirements of 40 CFR part 63 Subpart DDDDD by the compliance date specified in the regulation.

3. S051 thru S053, S055 thru S062 - Film Line

The equipment list that identifies the equipment that makes up the Film Line can be found in Appendix G. Any additions to this equipment list will require a permit modification.

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Facility Wide VOC Emissions	3.1.	N/A	99.4 tons/yr	8.18 x 10 ⁻⁴ lbs/lb product	Recordkeeping and Calculation	Monthly
Ozone	3.2.	N/A	2.9 tons/yr	10 g/kWhr	Recordkeeping and Calculation	Monthly
Corona Treater KiloWatt Hours (kWhrs)	3.3.	N/A	N/A	N/A	kWhr Meter, Recordkeeping	Monthly
Product Produced	3.4.	N/A	12,755 tons/yr	N/A	Recordkeeping	Monthly

3.1 Facility wide emissions of Volatile Organic Compounds (VOC) shall not exceed the limitations stated above (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 of this permit to remove monthly limits). The emission factors listed above have been approved by the Division and shall be used to calculate emissions from the film line (based on Stack Tests performed in June 1992). Monthly emissions shall be calculated by the end of the subsequent month using the quantity of product produced (as required by Condition 3.4) in the following equation:

$$\text{tons/month} = \frac{\text{EF (lbs/lb product)} \times \text{lbs tape produced per month}}{2000 \text{ lb/ton}}$$

Monthly emissions from the Film Line shall be used as specified in Condition 4.1 to monitor compliance with the facility wide VOC emission limitation.

3.2 Ozone emissions shall not exceed the following limits (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 of this permit to remove monthly limits). The emission factors identified above (manufacturer's emission factor) have been approved by the Division and shall be used to calculate emissions from this unit. Monthly emissions shall be calculated by the end of the subsequent month using monthly kWhrs (as required by Condition 3.3) in the following equation:

$$\text{tons/month} = \frac{\text{EF (g/kWhr)} \times \text{(kWhrs/mo)}}{2000 \text{ lbs/ton} \times 453.6 \text{ g/lb}}$$

Monthly emissions shall be used in a twelve-month rolling total to monitor compliance with annual limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

- 3.3 KiloWatt hours (kWhrs) from the corona treaters located on the Film Line shall be recorded monthly using a kWhr meter. Monthly kWhrs from the corona treaters will be used in the equation in Condition 3.2 to calculate emissions of ozone.
- 3.4 Product Produced shall not exceed the above limitations (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 of this permit to remove monthly limits). Compliance with the limitation shall be monitored by determining the monthly quantity of product produced by the end of the subsequent month. Monthly production shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

4. Facility Wide Requirements

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC Emissions	4.1	N/A	99.4 tons/year	See below	Recordkeeping and Calculation	Monthly
Insignificant Activities	4.2.	VOC emissions not to exceed 0.6 tons/yr		See Condition 4.2.	Recordkeeping and Calculation	One-Time

- 4.1 Emissions of VOC shall not exceed 99.4 tons/yr (Colorado Construction Permit 08AD0168, as modified under the provisions of Section I, Condition 1.3 of this permit to remove monthly limits). Monthly VOC emissions from the coating line, boilers and film line shall be calculated in accordance with the requirements in Conditions 1.1, 2.1 and 3.1.

Monthly emissions from the coating line, boilers and film line shall be summed together and used in a rolling twelve month total to monitor compliance with the annual limitations. Each month a new twelve month rolling total shall be calculated using the previous twelve months' data.

- 4.2 VOC emissions from insignificant activities shall not exceed 0.6 tons/yr (Colorado Construction Permit 08AD0168). Compliance with the limitation shall be monitored by conducting a potential to emit (PTE) analysis of VOC emissions from insignificant activities that demonstrates that VOC emissions do not exceed 0.6 tons/yr. The analysis, as well as the calculations and any supporting documentation, shall be retained on site and made available to the Division upon request.

Based on the information available as of permit issuance [January 1, 2011], the insignificant activities to be included in the above analysis are as follows: TDO burners (nine (9) at 0.5 mmBtu/hr each and one (1) at 1 mmBtu/hr) and eighteen space heaters (total of 3.38 mmBtu/hr).

The above analysis shall be updated if any new insignificant activities that can potentially emit VOC are added to the facility.

5. Cold Cleaner Solvent Vat

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Work Practice Standards	5.1.	N/A	N/A	N/A	Certification	Annually
Transfer and Storage of Waste/Used Solvents	5.2.	N/A	N/A	N/A	Certification	Annually

Note that this emission unit is exempt from the APEN reporting requirements in Regulation No. 3, Part A and the construction permit requirements in Regulation No. 3, Part B.

- 5.1 The design and operation of the cold cleaner solvent degreaser shall meet the standards defined in Colorado Regulation 7, Section X.B. The permittee’s operating procedures for solvent cleaning shall include these requirements.
- 5.2 The transfer and storage of waste and used solvents from the cold cleaner solvent vats are subject to the following requirements (Colorado Regulation No. 7, Section X.A.3 and 4):
 - 5.2.1 In any disposal or transfer of waste or used solvent, at least 80 percent by weight of the solvent/waste liquid shall be retained (i.e., no more than 20 percent of the liquid solvent/solute mixture shall evaporate or otherwise be lost during transfers).
 - 5.2.2 Waste or used solvent shall be stored in closed containers unless otherwise required by law.

The permittee’s operating procedures for the solvent vats and contracts and/or agreements with contractors to service these vats shall include these requirements.

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A.4, V.D., & XIII.B and § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based on the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.

Emission Unit Description & Number	Applicable Requirement	Justification
Boilers	40 CFR Subparts D, Da and Db, Standards of Performance for Steam Generators (as adopted by reference in Colorado Regulation No. 6)	These requirements are not applicable since the heat input of each boiler is less than 100 mmBtu/hr.
Facility	40 CFR Part 60 Subparts Ka and Kb, Standards of Performance for Storage Vessels for Petroleum Liquids and Volatile Organic Liquids (as adopted by reference in Colorado Regulation No. 6)	These requirements are not applicable since this facility has no storage vessels for petroleum liquids (Subpart Ka) and the storage vessels at this facility commenced construction before July 23, 1984 (Subpart Kb).
Facility	40 CFR 60 Subpart FFF, Standards of Performance for Flexible Vinyl and Urethane Coating and Printing (as adopted by reference in Colorado Regulation No. 6)	These requirements are not applicable since this facility is not involved in flexible vinyl and urethane coating and printing.
Facility	40 CFR 60 Subpart SSS, Standards of Performance for Magnetic Tape Coating Facilities (as adopted by reference in Colorado Regulation No. 6)	These requirements are not applicable since this facility is not involved in magnetic tape coating.
Facility	40 CFR 60 Subpart TTT, Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines (as adopted by reference in Colorado Regulation No. 6)	These requirements are not applicable since this facility is not involved in the coating of plastic parts for business machines.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

- 2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;

- 2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;
- 2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;
- 2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.
- 2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

3. Streamlined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

Permit Condition(s)	Streamlined (Subsumed) Requirements
Coating Line	
Section IV, Conditions 22.b & c	40 CFR Part 60 Subpart RR § 60.445(h), as adopted by referenced in Colorado Regulation No. 6, Part A [retain records for two (2) years]
Boilers	
Section II, Condition 2.4	Colorado Regulation No. 6, Part B, Section II.C.2 [State-Only particulate matter $(0.5(FI)^{-0.26})$ lb/mmBtu, where FI = heat input rate in mmBtu/hr) requirement for new fuel burning equipment]
Section IV, Conditions 22.b & c	40 CFR Part 60 Subpart Dc § 60.48c(i), as adopted by reference in Colorado Regulation 6, Part A [retain records for two (2) years]

SECTION IV - General Permit Conditions

11/16/10 version

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.& e. and V.C.17.

- a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.
- c. Compliance certifications shall contain:
 - (i) the identification of each permit term and condition that is the basis of the certification;
 - (ii) the compliance status of the source;
 - (iii) whether compliance was continuous or intermittent;
 - (iv) method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.
- d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.
- e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II.E., II.F., II.I, and II.J

- a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

- (i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;
- (ii) approves the use of an equivalent method;
- (iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or
- (iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

- (i) Sampling ports adequate for test methods applicable to such facility;
- (ii) Safe sampling platform(s);
- (iii) Safe access to sampling platform(s); and
- (iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Affirmative Defense Provision for Excess Emissions during Malfunctions

Note that until such time as the U.S. EPA approves this provision into the Colorado State Implementation Plan (SIP), it shall be enforceable only by the State.

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of evidence that:

- (i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;
- (ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;
- (iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;
- (iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;
- (v) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality;
- (vi) All emissions monitoring systems were kept in operation (if at all possible);
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence;
- (viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- (ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement; and
- (x) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

- (i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;
- (ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;
- (iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;
- (v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;
- (vi) All emissions monitoring systems were kept in operation (if at all possible);
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,
- (viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants, or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d. and § 25-7-122.1(2), C.R.S.

- a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.
- b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.
- d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.
- e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.
- f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:
 - (i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and
 - (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

- g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. the permitted facility was at the time being properly operated;
- c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

6. Emission Controls for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "asbestos control."

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

8. Fee Payment

C.R.S. §§ 25-7-114.1(6) and 25-7-114.7

- a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.
- b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

- c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

- a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;
- b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;
- d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.-II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

- a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.
- b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

“Prompt” is defined as follows:

- a. Any definition of “prompt” or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or
- b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;
 - (ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and
 - (iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.
- c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

“Prompt reporting” does not constitute an exception to the requirements of “Emergency Provisions” for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

- a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:
 - (i) date, place as defined in the Operating Permit, and time of sampling or measurements;
 - (ii) date(s) on which analyses were performed;
 - (iii) the company or entity that performed the analysis;
 - (iv) the analytical techniques or methods used;
 - (v) the results of such analysis; and
 - (vi) the operating conditions at the time of sampling or measurement.
- b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.
- c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee

shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

- d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.
- e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

- a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.
- b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.
- c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.
- d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

- a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.
- b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

The requirements in paragraphs a, b and e apply to sources located in an ozone non-attainment area or the Denver 1-hour ozone attainment/maintenance area. The requirements in paragraphs c and d apply statewide.

- a. All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

- b. Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.
- c. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.
- d. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.
- e. Beer production and associated beer container storage and transfer operations involving volatile organic compounds with a true vapor pressure of less than 1.5 PSIA actual conditions are exempt from the provisions of paragraph b, above.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

OPERATING PERMIT APPENDICES

- A - INSPECTION INFORMATION
- B - MONITORING AND PERMIT DEVIATION REPORT
- C - COMPLIANCE CERTIFICATION REPORT
- D - NOTIFICATION ADDRESSES
- E - PERMIT ACRONYMS
- F - PERMIT MODIFICATIONS
- G - EQUIPMENT LISTS

***DISCLAIMER:**

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

Directions to Plant:

Take I-76 East and exit at highway 2. The plant is approximately 4 miles north of I-76 at 1095 South Fourth Avenue, in Brighton.

Safety Equipment Required:

Eye Protection
Safety Shoes
Hearing Protection

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on July 28, 2009 with the source's Title V Operating Permit Application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Units with emissions less than APEN de minimis - criteria and non criteria pollutants (Reg 3, Part C.II.E.3.a & b)

In-house experimental and analytical laboratory equipment (Reg 3, Part C.II.E.3.i)

Fuel (gaseous) burning equipment < 5 mmBtu/hr (Reg 3, Part C.II.E.3.k)

S054/P054 - TDO burners (9 at 0.5 mmBtu/hr and 1 at 1 mmBtu/hr)

Chemical storage tanks or containers < 500 gal (Reg 3, Part C.II.E.3.n)

Landscaping and site housekeeping equipment < 10 hp (Reg 3, Part C.II.E.3.bb)

Fuel (gaseous) burning equipment < 10 mmBtu/hr used for personal heating (Reg 3, Part C.II.E.3.ggg)

One (1) space heater, 0.060 mmBtu/hr (breakroom)
Two (2) Space heaters, 0.160 mmBtu/hr, each (old offices)
Fifteen (15) space heaters, 0.20 mmBtu/hr each (plant/warehouse)



APPENDIX B

Reporting Requirements and Definitions

with codes ver 2/20/07

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

- (A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);
- (B) fails to notify or report as required under the Act; or
- (C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits. All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported “promptly”)

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to malfunctions as defined in this Appendix, the probable cause of

such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, “malfunction” shall refer to both emergency conditions and malfunctions. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

- (1) A situation where emissions exceed an emission limitation or standard contained in the permit;
- (2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;
- (3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,
- (4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

- | | |
|-------------------------|--|
| 1 = Standard: | When the requirement is an emission limit or standard |
| 2 = Process: | When the requirement is a production/process limit |
| 3 = Monitor: | When the requirement is monitoring |
| 4 = Test: | When the requirement is testing |
| 5 = Maintenance: | When required maintenance is not performed |
| 6 = Record: | When the requirement is recordkeeping |
| 7 = Report: | When the requirement is reporting |
| 8 = CAM: | A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. |
| 9 = Other: | When the deviation is not covered by any of the above categories |

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the

permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.¹
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

Startup, Shutdown, Malfunctions and Emergencies

Understanding the application of Startup, Shutdown, Malfunctions and Emergency Provisions, is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and

¹ For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event.

would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergency Provisions

Under the Emergency provisions of Part 70 certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Monitoring and Permit Deviation Report - Part I

- Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Intertape Polymer Corporation (IPG) – Brighton Plant

OPERATING PERMIT NO: 09OPAD337

REPORTING PERIOD: _____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations Noted During Period? ¹		Deviation Code ²	Malfunction/ Emergency Condition Reported During Period?	
		YES	NO		YES	NO
S007 thru S009	Coating Line					
S048	Cleaver Brooks, Model No. 700-800, Fire-Tube Steam Boiler, Rated at 33.48 mmBtu/hr, Serial No. OL-09511. Natural Gas Fired.					
S049	Cleaver Brooks, Model No. 700-600, Fire-Tube Steam Boiler, Rated at 25 mmBtu/hr, Serial No. L-84624. Natural Gas Fired.					
S051 thru S053, S055 thru S059, S061 & S062	Film Line					
	Cold Cleaner Solvent Vat					
	General Conditions					
	Insignificant Activities					

¹ See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

² Use the following entries, as appropriate:

- 1 = Standard:** When the requirement is an emission limit or standard
- 2 = Process:** When the requirement is a production/process limit
- 3 = Monitor:** When the requirement is monitoring
- 4 = Test:** When the requirement is testing
- 5 = Maintenance:** When required maintenance is not performed
- 6 = Record:** When the requirement is recordkeeping
- 7 = Report:** When the requirement is reporting

- 8 = CAM:** A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
- 9 = Other:** When the deviation is not covered by any of the above categories

Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Intertape Polymer Corporation (IPG) – Brighton Plant
OPERATING PERMIT NO: 09OPAD337
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Malfunction _____ N/A _____

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction _____
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Malfunctions/Emergencies Reported (if applicable)

Deviation Code _____

Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/06

Is the deviation being claimed as an: Emergency _____ Malfunction XX N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/06
END- 1800 4/10/06

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Malfunction/Emergencies Reported (if applicable)

5/30/06 to A. Einstein, APCD

Deviation Code _____ Division Code QA: _____

Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Intertape Polymer Corporation (IPG) – Brighton Plant

FACILITY IDENTIFICATION NUMBER: 0010195

PERMIT NUMBER: 09OPAD337

REPORTING PERIOD: _____ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Printed or Typed Name

Title

Signature of Responsible Official

Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.

APPENDIX C

Format for Annual Compliance Certification Reports

with codes ver 2/20/07

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Intertape Polymer Corporation (IPG) – Brighton Plant

OPERATING PERMIT NO: 09OPAD337

REPORTING PERIOD:

I. Facility Status

___ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

___ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported ¹		Monitoring Method per Permit? ²		Was Compliance Continuous or Intermittent? ³	
		Previous	Current	YES	NO	Continuous	Intermittent
S007 thru S009	Coating Line						
S048	Cleaver Brooks, Model No. 700-800, Fire-Tube Steam Boiler, Rated at 33.48 mmBtu/hr, Serial No. OL-09511. Natural Gas Fired.						
S049	Cleaver Brooks, Model No. 700-600, Fire-Tube Steam Boiler, Rated at 25 mmBtu/hr, Serial No. L-84624. Natural Gas Fired.						
S051 thru S053, S055 thru S059, S061 & S062	Film Line						
	Cold Cleaner Solvent Vat						

Operating Permit Unit ID	Unit Description	Deviations Reported ¹		Monitoring Method per Permit? ²		Was Compliance Continuous or Intermittent? ³	
		Previous	Current	YES	NO	Continuous	Intermittent
	General Conditions						
	Insignificant Activities ⁴						

¹ If deviations were noted in a previous deviation report, put an “X” under “previous”. If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an “X” under “current”. Mark both columns if both apply.

² Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark “no” and attach additional information/explanation.

³ Note whether the compliance status with of each term and condition provided was continuous or intermittent. “Intermittent Compliance” can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

⁴ Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

- A. This facility _____ is subject _____ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)
- B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).
1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

Printed or Typed Name

Title

Signature

Date Signed

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D

Notification Addresses

1. **Air Pollution Control Division**

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530

ATTN: Matt Burgett

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Air and Radiation Programs, 8P-AR
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/mmBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
KW-HR -	Kilowatt-Hour
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
Mg -	Mega Gram
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions

PM -	Particulate Matter
PM ₁₀ -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO ₂ -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX G

Equipment Lists

Coating Line and Affiliated Equipment

The following equipment has been identified by the source as equipment associated with Coating Line 2.

Unit ID No.	Equipment Description	Control Device
P200	#2 Coater Dryer Oven	Activated Carbon Bed Solvent Recovery System
P201	#2 Primer Dryer Oven	
T202	#2 Coater Primer Tank	
P203	#2 Coater Release Dryer Oven	
T204	#2 Coater Release Tank	
P212	Distillation Column DS2700	
P814 thru P818	Adhesive Mixers MT5101 thru MT5105	
P819	Release Mixer MT 5112	
P820	Primer Mixer MT5111	
T821, T822 & T823	Primer Tanks TK5401, TK5402 and TK5403	
T824 & T825	Release Tanks TK5404 and TK5405	
T826 thru T830	Adhesive Tanks TK5201 thru 5205	
T930 thru T933	Solvent and Mixed Solvents Tanks TK5001, TK5002, TK5501 and TK5502	

Film Line

The following equipment has been identified by the source as equipment associated with the Film Line

Stack ID No.	Unit ID No.	Equipment Description	Control Device
S051	P051	Corona Treatment Exhaust "A"	Uncontrolled
S052	P052	Northern Cooling Vent "B1"	
S053	P053	Southern Cooling Vent "B2"	
S054	P054	TDO Burners "D" Note that the TDO burners are insignificant activities per Reg 3, Part C, Section II.E.3.k and are included in the insignificant activity list in Appendix A ¹	
S055	P055	Extruder Exhaust "E"	
S056	F056	Extruder Exhaust - fugitive	
S057	P057	Reclaim Process Silo Exhaust "F"	
S058	P058	Reclaim Process Pellet Dryer Exhaust "G"	
S059	P059	Beringer Exhaust "H"-	
S061	F061	Other Fugitive Exhausts "X"	
S062	P062	Cooling Vent "C"	

¹There are 10 burners, 9 at 0.5 mmBtu/hr, each and 1 at 1.0 mmBtu/hr.