



TECHNICAL SUPPORT DOCUMENT

Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502
(360) 539-7610 or 1-800-422-5623

PERMIT NO:	11AOP864
ISSUANCE DATE:	June 23, 2016
EXPIRATION DATE:	June 23, 2021
PERMITTEE:	Little Green, LLC dba Paneltech
MAILING ADDRESS:	2999 John Stevens Way Hoquiam, WA 98550
FACILITY LOCATION:	2999 John Stevens Way Hoquiam, WA 98550
FACILITY DESCRIPTION:	Phenolic Resin Manufacturing and Specialty Paper Coating Facility
ORCAA FILE #:	145
PRIMARY SIC:	2672, 2821

Public Version

Table of Contents

Section 1.	Disclaimer	1.
Section 2.	Business Description	2.
Section 3.	Emissions Unit Descriptions	10.
Section 4.	Facility Emissions	11.
Section 5.	NSR Background	15.
Section 6.	Applicability of Federal Standards	21.
Section 7.	Applicability of WA State Standards	67.
Section 8.	Monitoring	68.
Section 9.	Permit Renewal, Revocation, Reopening, and Revisions	69.
Section 10.	Regulatory Basis	73.

Section 1. Disclaimer

Information contained in this Technical Support Document is for purposes of background information only and is not directly enforceable. Applicable requirements including emission limits and monitoring, record keeping, and reporting requirements are contained in Little Green, LLC dba Paneltech Air Operating Permit (AOP) permit number 11AOP864.

Section 2. Business Description

Little Green, LLC dba Paneltech (Paneltech) is a specialty paper coating manufacturing facility located at the Port of Grays Harbor in Hoquiam, Washington. Currently, production operations occur in Warehouses F and G, which are leased from the Port of Grays Harbor.

On February 07, 2013, Paneltech requested a change of business name from Paneltech Products, Inc. to Little Green, LLC dba Paneltech. On January 24, 2013, in the United States Bankruptcy Court, Little Green, LLC was the successful bidder for assets including all permits to operate the facility located at 2999 John Stevens Way, Hoquiam, Washington (and related buildings) of Paneltech Products, Inc. Beginning February 06, 2013, Paneltech resumed operations in substantially the same fashion as the business formerly known as Paneltech Products, Inc. located at 2999 John Stevens Way, Hoquiam, WA.

Paneltech uses both purchased resin and resin produced in an on-site batch reactor plant to impregnate paper for a variety of products, including: wood panel overlays, paint roller cores, honeycomb core, and other laminated products. Paneltech also manufactures a series of products called Fortrex™, PaperStone™ and RainStone™ used for armor laminate systems, countertops, rain guards, skating ramps, cladding and other indoor and outdoor uses. In 2006 Paneltech was approved to install and operate a press to manufacture PaperStone™ on site.

Fortrex™

The development of Fortrex™ consists of solution coating and curing of aramid and high performance glass fibers such as DuPont Kevlar® and AGY S-2 Glass® in support of governmental projects and programs. Coated fiberglass fabrics conform to MIL-DTL-64154B specifications for use with HJ1 and other S-glass or R-glass based composite armor laminate systems. Coated Kevlar® and other aramid fabrics conform to all classes of MIL-DTL-62474F(1) composite armor laminate systems.

Overlays™

Paneltech manufactures both standard and custom wood panel Overlays™ and saturated media. Paneltech uses a wide range of product platforms including both specialty papers and non-cellulose webs, allowing for craft overlay concepts to match a particular product need and to accommodate differences in panel manufacturing processes.

Medium density Overlays™ (MDOs) are heavy Kraft paper-based products that are first saturated and cured, then coated with phenolic glue resin for application directly to hardwood or softwood plywood in a hot press. Since the resin in the paper is fully cured, MDO can be pressed directly to a press platen without sticking. Paneltech's standard MDO products meet the requirements of PS 1-07 and have been certified by the APA. High density Overlays™ (HDOs) are highly saturated papers that are self-bonding to the substrate without a glue coating. Because of their higher resin content, they produce a somewhat glossier surface texture compared with MDO resulting in an “architectural finish” on concrete surfaces. The higher resin gives the HDO superior barrier properties and increased resistance to abrasion and alkalinity.

Continued – Section 2. Business Description

RainStone™ and PaperStone®

Both RainStone™ and PaperStone® are manufactured from 100 percent recycled post-consumer waste paper that has been saturated with Paneltech's proprietary PetroFree™ phenolic resins and selected natural pigments. After trimming to length, resin-saturated sheets of paper are stacked and moved into a press where they are fused together under heat and pressure. Paper sheet count determines the thickness of the finished composite panels.

RainStone™ sustainable cladding is available in two series: RainStone™ solid surface and RainStone OCTM with opaque coating. Paneltech's pigment selection and mixing ensures maximum color uniformity and UV resistance. A waterborne acrylic outer coating is also applied to provide additional weather proofing and light protection.

RainStone™ and PaperStone® are certified to Forest Stewardship Council standards by the Smartwood program of the Rainforest Alliance. PaperStone® is a certified sustainable composite cladding product available to architects and designers. PaperStone® is VOC-free and emits no radon gases. It has been certified 'food safe' by NSF, the public health and safety company.

Uses for PaperStone® include: countertops, bathroom vanities, conference tabletops, signs and plaques, window sills, cutting boards, furniture, restroom partitions, cabinets, indoor wall cladding and more.

Section 3. Emissions Unit Descriptions

At present, Paneltech’s Hoquiam facility consists of (4) four emission units. Emissions from all five units are vented to the same stack. A single control device, a regenerative thermal oxidizer (RTO) with a maximum capacity of 20,000 acfm, is used to incinerate VOCs and organic HAPs and TAPs. For this permit, emission units have been designated as shown in Table 1.

Table 1: Emission Unit Descriptions

Emission Unit ID#	Description	Facility Location	Exhaust Point ID#	Control Equipment
EU-1	<p>Paper coating line: Rolls of paper are saturated in resin solution and then the resin is cured in a gas-heated curing section until quenched by chiller rolls. Emissions include methanol (or ethanol, used as a solvent), uncombined phenol and formaldehyde, and other resin additives.</p> <p>Paper coating process heater system: Natural gas is consumed to heat the curing section of the paper coating line.</p>	Warehouse G	Stack 1	<p>The coating line is fully contained and the captured emissions are vented to a Regenerative Thermal Oxidizer (RTO)</p> <p>Good combustion practices and natural gas as only fuel.</p>
EU-2	<p>Resin plant: Phenol-formaldehyde resins are produced in a steam-heated reaction vessel called a kettle. Emissions from the resin plant come from the following equipment:</p> <ul style="list-style-type: none"> • Reaction vessel with reflux • Phenol tanks • Formaldehyde solution tank • Methanol tank • Resin dryer 	Warehouse G	Stack 1	The batch reactor is operated under a closed reflux system. All emissions from reactor, associated tanks, and resin dryer are routed to a RTO.
	<p>Equipment Leak Components - Valves, pumps and pressure relief devices</p>		Fugitive	N/A
EU-3	<p>Composites press: Partially cured, resin-saturated paper is cross linked and bonded into rigid panels in a hydraulic press. The press is fully contained in a permanent total enclosure as defined in EPA Method 204.</p> <p>Composites press heater: Natural gas is combusted to heat the oil used in the thermal fluid transfer system designed to maintain a uniform temperature across the platens.</p>	Warehouse F	Stack 1 and Stack 3	<p>RTO</p> <p>Good combustion practices and natural gas as only fuel.</p>
EU-4	<p>Resin plant boiler: Natural gas is combusted to create steam and heat the reactor kettle of the resin plant.</p>	Warehouse G	Stack 2	None - Good combustion practices and natural gas as only fuel.

Continued – Section 3. Emissions Unit Descriptions

Table 2: Regenerative Thermal Oxidizer (RTO) Description

Exhaust Point ID#	Location	Capacity Air Flow	Stack Inside Diameter	Stack Height	Heat Capacity
Stack 1	West of Warehouse G	20,000 acfm	35.25 inches	44 feet	8.0 MMBtu/hr.

EU-1: Paper Coating Line

Resin, whether produced on-site or purchased, is pumped from storage tanks and combined with additives in mix tanks. From the mix tanks, the resin solution is then pumped into the saturating pan. Rolls of paper are mounted on the coating line and saturated with resin solution in the pan. The paper is then threaded through the gas-heated drying section of the line to be cured. Curing stops when quenched by chilling rolls and cool air. At this point, rolls of saturated paper can be cut or rolled to customer specifications, sent to a glue line and final ovens, or cut and sent to the hydraulic press to prepare composite panels.

Emissions Unit #1 (EU-1) consists of the saturating and curing sections of the paper line, which are fully enclosed with all gases vented to the RTO. Emissions include unreacted formaldehyde and phenol, methanol (or ethanol), and resin additives such as ethylene glycol and vinyl acetate. The resin is mostly, though not completely, cured in the curing section. After the reaction is quenched and the paper cooled, emissions are considered to be negligible unless the paper product is heated.

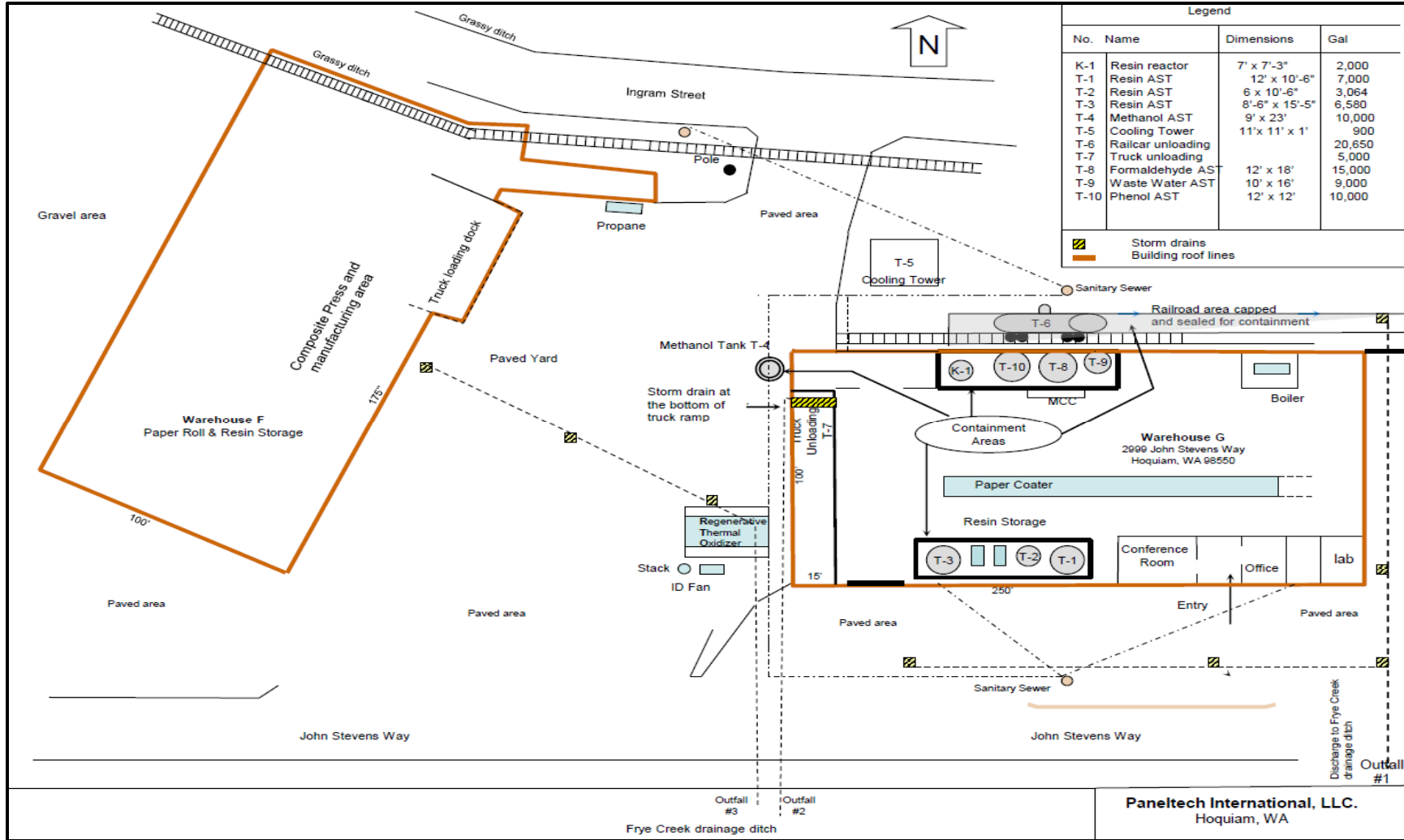
EU-2: Resin Plant

Emissions Unit #2 (EU-2) consists of the reactor kettle, the resin dryer, phenol and formaldehyde storage tanks, and associated valves and pumps. Resin is produced in a [REDACTED] reaction vessel called the reactor kettle, which is heated with steam provided by a [REDACTED] natural gas-fired package boiler. Phenol, formaldehyde, methanol, caustic soda, and catalyst salts are cooked in the kettle and any vapors produced are routed back through a closed-loop condenser system. The reaction occurs under atmospheric pressure, and the products are cooled by evaporation using a vacuum pump. The only time air emissions occur is during operation of the vacuum pump. All exhaust gases are routed to the RTO.

In addition to the kettle, several fixed-roof storage tanks are included in the resin plant, of which only the phenol, formaldehyde, and methanol tanks have high enough vapor pressures to result in significant air emissions. Figure 1 shows a site map of the facility, with labeled components of the resin plant (EU-2).

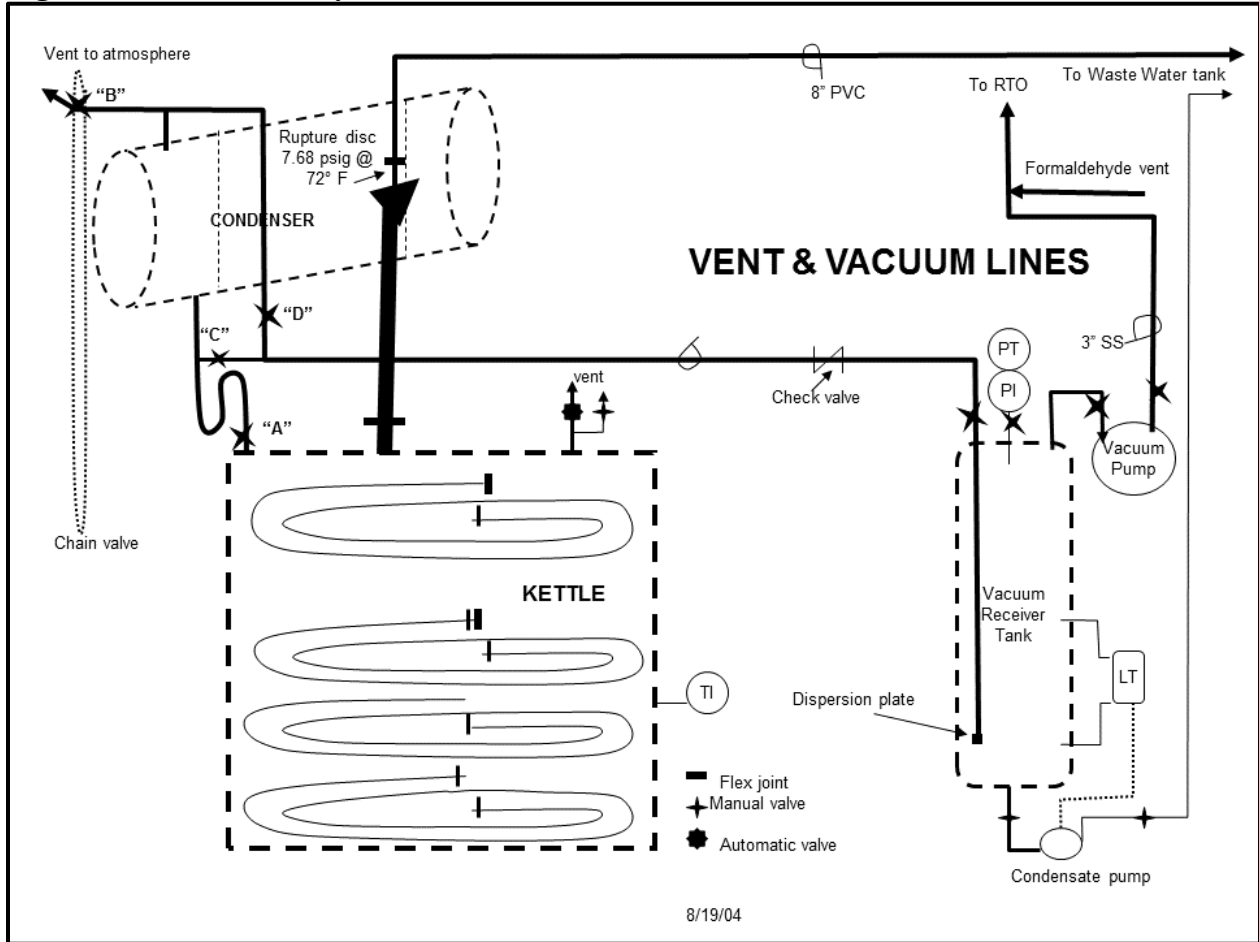
Continued – Section 3. Emissions Unit Descriptions

Figure 1: Facility Site Map



Continued – Section 3. Emissions Unit Descriptions

Figure 2: Resin Plant Layout



While the methanol tank is being loaded, the tank vent is connected to the delivery truck, so any escaping vapor from the tank will replace empty space in the delivery truck container. In addition, under ordinary operating conditions, the methanol tank is controlled by a water lock. Standing and working losses from the formaldehyde tank is routed to the RTO. The phenol storage tanks are controlled by water locks.

In 2007, Paneltech applied to install a steam-heated resin dryer to cure batches of surplus resin that can then be disposed as solid waste or sold as a co-product. This dryer meets the definition of a resin process unit in the Resin MACT (40 CFR Part 63 Subpart OOO), therefore the dryer is part of the resin plant.

Continued – Section 3. Emissions Unit Descriptions

EU-3: Composites Press and Process Heater

Emissions Unit #3 (EU-3) consists of the enclosed hydraulic press. Some of the saturated paper produced on the paper coating line (EU-1) is used to prepare rigid composite panel products marketed under the names PaperStone™ and RainStone™. In order to crosslink and bond the many layers in each panel, resin-impregnated paper that has been partially cured to a tacky state is heated using a [REDACTED] process heater, and pressed in a hydraulic press. Because the resin is not fully cured before entering the press, there are quantities of free compounds – including phenol, formaldehyde, and methanol – that could potentially be emitted to the atmosphere. To control these emissions, the hydraulic press is housed within a permanent total enclosure that captures and routes air emissions to the RTO.

EU-4 and Natural Gas Combustion Equipment

Emissions Unit #4 (EU-4) consists of a natural gas fired boiler to provide heat to the resin plant. Natural gas is used to heat: the curing section of the paper coating line, the composite press enclosure, the steam to dry surplus resin and the RTO. The total maximum natural gas combustion rate of Paneltech's Hoquiam facility is [REDACTED].

Fee Eligible Units

ORCAA calculates annual fees for Title V sources (AOP fees) using a formula that includes a facility fee, a fee based on the number of emission units, and a fee based on actual emissions. The intent of this formula is to relate AOP fees to ORCAA's workload and the source's air impacts.

The formula used to calculate AOP fees is found in ORCAA Regulations 3.2 and the definition of *emission unit* found in ORCAA Rule 1.4 applies. Fees may therefore be assessed based on units that would be considered insignificant under WAC 173-401-530 or emit only fugitive emissions.

In the case of Paneltech's Hoquiam facility, the fee eligible emission units are identical to the significant emission units described above.

Insignificant Emissions Units

Insignificant Emissions Units Insignificant emission units (IEUs) include any activity or emissions unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list of the IEUs, identified in the permit application, is presented below in Table 3. In order to remain an IEU, emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels. In addition, Paneltech's facility includes IEUs that are considered insignificant under WAC 173-401-530(1)(d) because they only generate fugitive emissions, under WAC 173-401-532 because they are categorically exempt, or under WAC 173-401-533 because of their size. These emissions units are exempt from permit program requirements and

Continued – Section 3. Emissions Unit Descriptions

unit-specific requirements, but are subject to ORCAA’s general requirements including facility-wide emissions limitations, fugitive dust, opacity, grain loading standards, and nuisance odor regulations. Emission units exempt from permit program requirements may be fee eligible. According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not required for IEUs unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the State Implementation Plan (SIP). ORCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the IEUs presented in Table 3 to assure compliance with the generally applicable requirements. ORCAA’s determination was based on the following:

- ORCAA has not documented a violation of any of the generally applicable requirement in the past from the list of IEUs in Table 3 (i.e., the IEUs have had a consistent compliance history).
- Most of the IEUs emit small quantities of pollutants and/or do not operate continuously.

Table 3: Selected List of Insignificant Emissions Units

Emissions Unit Description	Basis	Comments
Pressurized storage of oxygen, nitrogen, carbon dioxide, air	WAC 173-401-532(5)	
Storage of solid, dust-free material	WAC 173-401-532(6)	Includes cool, cured paper and panels
Vents from the warehouse	WAC 173-401-532(9)	All significant emissions units enclosed
Brazing, soldering, and welding equipment	WAC 173-401-532(12)	Emissions units are contained.
Kitchen facility	WAC 173-401-532(41)	
Portable drums and totes of methanol, ethylene glycol, resin, glue resin, and additives	WAC 173-401-532(42)	
Air conditioning system in the office and laboratory	WAC 173-401-532(46)	Air conditioning system in the office and laboratory
Office activities	WAC 173-401-532(49)	
Sampling connections	WAC 173-401-532(51)	
Fuel and exhaust emissions from vehicles in parking lots	WAC 173-401-532(54)	
Carving, cutting, routing, Drilling, machining, sawing, surface grinding, sanding, planing, buffing; paper stock and wood	WAC 173-401-532(55)	Exempt if: done indoors and no external emissions
Routine plant upkeep	WAC 173-401-532(33)	

Continued – Section 3. Emissions Unit Descriptions

Continued – Table 3: Selected List of Insignificant Emissions Units

Emissions Unit Description	Basis	Comments
Chemical lab operations	WAC 173-401-533(3)(c)	Insignificant with approval of ORCAA
Cleaning and sweeping of streets and paved surfaces	WAC 173-401-532(35)	Other than spill response
Batch loading and unloading of solid phase catalysts	WAC 173-401-532(60)	
Mixing, packaging, storage and handling activities of aqueous salt activities	WAC 173-401-532(69)	
Paper trimmers	WAC 173-401-532(72)	
Sample gathering, preparation, and management	WAC 173-401-532(73)	
Repair and maintenance activities	WAC 173-401-532(74)	Must not involve installation of an emissions unit or control device or increase potential to emit
Batteries and battery charging	WAC 173-401-532(77)	
Solid waste containers	WAC 173-401-532(79)	
Steam vents and safety relief valves	WAC 173-401-532(87)	
Air compressors, pneumatically operated equipment, systems, and hand tools	WAC 173-401-532(88)	
Steam leaks	WAC 173-401-532(89)	
Sewer manholes, junction boxes, sumps, and lift stations associated with wastewater treatment	WAC 173-401-532(120)	
Electric and steam heated drying ovens and autoclaves	WAC 173-401-532(119)	
Water cooling towers processing exclusively noncontact cooling water	WAC 173-401-532(121)	
Propane tank < 40,000 gallons	WAC 173-401-533(2)(d)	450 gallon tank
Welding less than 1 ton per day of welding rod	WAC 173-401-533(2)(i)	
Space heaters and hot water heaters using propane	WAC 173-401-533(2)(r)	

Section 4. Facility Emissions

Regulated air pollutant emissions to the ambient atmosphere from Paneltech's facility will consist of volatile organic compounds (VOC), particulate matter (PM), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), toxic air pollutants (TAPs), hazardous air pollutants (HAPs), and the greenhouse gases (GHG) methane (CH₄), nitrous oxide (N₂O) and carbon dioxide (CO₂).

The primary air pollutants of concern are HAPs and TAPs, as defined in the Federal Clean Air Act and Chapter 173-460 WAC respectively, resulting from the saturation of paper with phenol-formaldehyde resin and subsequent curing of the resin. The largest individual facility-wide emitted HAP, also considered a TAP, is methanol. Although other HAPs and TAPs are emitted, including resin additives, such as vinyl acetate and ethylene glycol, and excess phenol and formaldehyde. Paneltech is a major air pollution source solely due to methanol emissions¹. Small amounts of HAP and TAP emissions, primarily phenol and formaldehyde, also result from resin production and working losses from storage tanks. In addition, Paneltech's regenerative thermal oxidizer (RTO) combustion of natural gas results in emissions of CO, NO_x, SO₂, GHG, VOC and PM.

Potential to Emit

Potential to emit (PTE) is defined as the maximum possible emissions, given physical and regulatory limitations. On this basis, ORCAA staff calculated PTE emissions for EU-1, EU-2, EU-3, and EU-4 implementing ORCAA-approved mass balance based emission factors, material usage rates and heat rates. ORCAA staff conservatively estimated a PTE of all regulated air pollutants, summarized in Tables 4 through 7.

The HAPs that have been emitted at the highest rates from EU-1 are methanol, phenol, and formaldehyde. In order to allow operational flexibility while still being protective of human health and the environment, other compounds that are recognized as HAPs or TAPs may be emitted provided they meet certain criteria and are limited to the emission rates in Table 4. Emission limits for individual TAPs would be based on the modeling done for phenol to support NOC Modification (#03MOD335). These criteria and emission limits result from the Approval Order (#06MOD517), which places a regulatory limit of 48.0 tons per year on total VOC. The resulting potential to emit from EU-1 is shown in Table 5.

Approved TAPs must meet the following criteria:

1. Listed as a TAP with an acceptable source impact level (ASIL) published in WAC 173-460-150;
2. Destructible in the RTO with a destruction efficiency similar to phenol, formaldehyde, and methanol (e.g. non-halogenated organics);
3. Air emissions must be routed through RTO and stack;
4. Not marketed primarily as an insecticide, herbicide, rodenticide, or other pesticide; and
5. Not trigger a new federal standard for the resin plant or coating line (e.g. polystyrene or methacrylate production)

¹ Paneltech is permitted to use ethanol as a substitute for methanol when necessary. From the standpoint of both Washington and Federal clean air regulations there is little reason to differentiate between methanol and ethanol.

Continued – Section 4. Facility Emissions

Table 4: Facility-wide VOC and TAP Emissions Limitations

Pollutant	CAS #	Annual Potential to Emit (Tons per year)	
Volatile Organic Compounds (VOC)	-	48.0	
Formaldehyde	50-00-0	1.0	
Methanol or Ethanol	67-56-1	32.0	
Phenol	108-95-2	4.50	
Other individual organic TAP	-	If ASIL \geq 63.0	4.50
		If $28.0 \leq$ ASIL $<$ 63.0	2.0
		If ASIL $<$ 28.0	(ASIL/63.0)* 4.50

→ Emission limits from NOC (#06MOD517)

→ ASIL – Acceptable Source Impact Level found in WAC 173-460-150

Table 5: EU-1 Potential to Emit Without Combustion Emissions

Pollutant	CAS #	Pounds per Hour	Tons per year
VOC	-	11.0	47.0
Methanol	67-56-1	10.0	28.0
Ethanol	64-17-5	10.0	28.0
Phenol	108-95-2	1.30	3.60
Formaldehyde	50-00-0	0.30	0.70
Ethylene Glycol	107-21-1	0.30	0.90
Vinyl Acetate	108-05-4	0.010	0.040
Other organic TAP	-	See Table 4	See table 4

→ Emissions from NOC (#03MOD335) were reviewed by ORCAA and calculated using a 98.5% RTO destruction efficiency for methanol.

→ Ethanol only used as a substitute for methanol

Emissions from EU-2, the resin plant, are low in comparison to EU-1, as can be seen in Table 6. EU-3, the composite press, also emits HAPs, TAPs, and VOC. However, because EU-1's potential to emit is calculated based on complete resin curing, EU-3's VOC emissions have already been counted as part of EU-1's potential to emit.

Table 6: EU-2 Potential to Emit

Pollutant	CAS #	Pounds per Hour	Tons per year
VOC	-	0.010	0.040
Phenol	108-95-2	0.010	0.030
Formaldehyde	50-00-0	0.0020	0.010

→ Emissions reviewed by ORCAA from NOC (#04NOC365) and calculated using a 98% RTO destruction efficiency

Continued – Section 4. Facility Emissions

Paneltech also emits combustion products as a result of natural gas consumption. Criteria pollutant emissions from natural gas consumption are shown in Table 7. Both criteria and greenhouse gas emissions are shown from all natural gas consumption including the RTO, the dryers/ovens from EU-1, and the kettle heating boiler (EU-4), and oil heater for the composites press (EU-3). In addition, TAPs and HAPs are also emitted when a portion of the accumulated condensate in the condensate receiver tank is disposed of by spraying it in the RTO.

Table 7: Potential to Emit from Combustion of Natural Gas Equipment

Pollutant	Pounds per Hour	Tons per year
PM ₁₀	1.9E-01	8.5E-01
SO ₂	4.0E-02	1.8E-01
NO _x	2.6E+00	1.1E+01
VOC	1.4E-01	6.2E-01
CO	2.2E+00	9.4E+00
CO ₂	3.1E+03	1.3E+04
CH ₄	6.0E-02	2.6E-01
N ₂ O	6.0E-02	2.5E-01
Phenol	2.3E-02	1.0E-01

→ Emissions were calculated assuming continuous operation year round (8760 hours per year) and a 26.05 MMBtu/hr. total heat capacity from RTO, dryers/ovens, and the kettle heating boiler.

→ Waste water phenol emissions from NOC (#05NOC428) were reviewed by ORCAA and calculated using a 98% RTO destruction efficiency for phenol.

Table 8: Facility-wide Potential to Emit

Pollutant	Pounds per Hour	Tons per year	Title V Status
Total Suspended Particulate (TSP)	1.9E-01	8.5E-01	Natural Minor
SO ₂	4.0E-02	1.8E-01	Natural Minor
NO _x	2.6E+00	1.1E+01	Natural Minor
VOC	1.1E+01	4.8E+01	Synthetic Minor
CO	2.2E+00	9.4E+00	Natural Minor
CO ₂ e	3.1E+02	1.4E+04	N/A
Phenol	1.0E+00	4.5E+00	Synthetic Minor
Formaldehyde	2.3E-01	1.0E+00	Synthetic Minor
Methanol	7.3E+00	3.2E+01	Major
Total HAP	1.1E+01	4.8E+01	Major
Total TAP	1.1E+01	4.8E+01	N/A

Continued – Section 4. Facility Emissions

Actual Emissions

Paneltech emits organic HAPs and VOCs and minor amounts of combustion related emissions. Other HAPs include unreacted phenol and formaldehyde, as well as resin additives. Actual emissions, which were included in ORCAA’s 2011 through 2014 emissions inventory, are shown in Table 9.

Table 9: 2011-2014 Actual Emissions

Pollutant Name	CAS #	2011 Emissions	2012 Emissions	2013 Emissions	2014 Emissions
VOCs	-	15.0	13.0	19.0	11
Total Suspended Particulate (TSP)	-	0.15	0.14	0.20	0.04
CO	630-08-0	2	2	2.1	2.3
CO ₂	124-38-09	2338	2190	3326	3584
NO _x	-	2.0	1.8	2.5	2.7
SO _x	-	20	22	400	32
Formaldehyde	50-00-0	853	766	1657	749
Isopropanol	67-63-0	30	86	8	3
Methanol	67-56-1	13	11	15	10
Phenol	108-95-2	1991	1832	5980	1390
Vinyl Acetate	108-05-04	12	15	36	34
Ethylene Glycol	107-21-1	167	-	-	-

→ Emissions are in tons per year for methanol, VOC, CO, CO₂, and NO_x; pounds per year for other pollutants

→ Ethylene glycol was emitted in small amounts in previous years but did not appear in the 2012+ inventory

→ Acetic acid was emitted in small amounts in previous years but did not appear in the 2012+ inventory

Section 5. NSR Background

The New Source Review (NSR) regulatory process is designed to facilitate review and evaluation of air implications prior to construction, installation, establishment or modification of an air contaminant source. The goal of NSR is to assure new sources of air pollution are established in a manner that assures compliance with applicable air regulations and standards, including any ambient air quality standard (AAQS). The local air regulatory authority with jurisdiction in this case is the Olympic Region Clean Air Agency (ORCAA). Since ORCAA enforces a local NSR regulation, these regulations are applicable in reviewing and approving new sources and modifications in ORCAA's jurisdiction. Approval is contingent on an initial Notice of Construction (NOC) application and final determination by ORCAA that the proposed new source will likely comply with all applicable air regulations and standards.

ORCAA's Regulation 6 contains NSR procedures and requirements unique to ORCAA. ORCAA's rule 6.1(a)(1) requires a NOC application to be filed with and approved by ORCAA prior to the construction, installation, or establishment of any stationary source in ORCAA's jurisdiction. ORCAA's rule 6.1(a)(2) also requires a NOC application to be filed with and approved by ORCAA prior to the modification of an air contaminant source.

Paneltech commenced operations in Hoquiam in 1996 after first registering as an air contaminant source with ORCAA. Since registering with ORCAA, Paneltech has received several NOC pre-construction approvals and two regulatory modifications, which are briefly described below. Tables 5.1 to 5.8 provide a summary of conditions from all NOC Order of Approval and the status of each condition in Paneltech's AOP.

NOC Order of Approval (#96NOC010)

In 1996, under 96NOC010, Paneltech applied to install a specialty paper coating line using phenol-formaldehyde resins. ORCAA conditionally approved this NOC on September 25, 1996, establishing emissions limitations of 5.13 lbs/hr. for phenol and 0.3 lbs/hr. for formaldehyde.

Table 10: NOC Approval Order (#96NOC010) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
96NOC010 (9/25/96)	1-10	All Conditions	Superseded – emission limitations and monitoring and record keeping requirements superseded by 03MOD335. Other conditions are Not Ongoing.

NOC Order of Approval (OA #98NOC031)

In 1998, under 98NOC031, Paneltech applied to voluntarily limit emissions and operate as a synthetic minor. ORCAA conditionally approved this NOC on February 22, 1999 with the conditions that Paneltech install and maintain an RTO and limit material use.

Continued – Section 5. NSR Background

Table 11: NOC Approval Order (#98NOC031) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
98NOC031 (2/22/99)	1-10	All Conditions	Superseded – 98NOC031 was specifically superseded by 03MOD335.

NOC Order of Approval (#03MOD335)

In 2003, Paneltech applied to increase their voluntary methanol emissions limitation of 9.9 tons per year to 32 tons per year. ORCAA conditionally approved the NOC modification on January 8, 2004, superseding previous NOC approval orders. The regulatory modification resulted in Paneltech becoming a “major source” according to the federal Title V program, since PTE emissions of an individual HAP (methanol) exceeded 10 tons per year.

In addition to becoming a Title V major source, Paneltech also became subject to the emission standards and other requirements of the National Emissions Standards for Hazardous Air Pollutants for Source Categories (MACT) for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ).

Table 12: NOC Approval Order (#03MOD335) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
03MOD335 (1/8/04)	1	Technical Specifications	Ongoing – used as a point of reference for determining future NSR actions.
	2	Use of New Materials – new materials containing TAPs must be approved by ORCAA prior to use.	Applicable Requirement – Condition FW17, used as a point of reference for determining future NSR actions.
	3	Plant-Wide Annual Emissions Limitation	Applicable Requirement – Condition FW3
	4	Emission Rate Limitation	Applicable Requirement – Condition AR1.0
	5	Operation and Maintenance	Applicable Requirements – Condition FW18 and AR1.9
	6	Stack Testing	Applicable Requirements – Conditions AR1.0 and M8
	7	Performance Monitoring	Applicable Requirement – Conditions M1, M7, M8, M9, M10, and M11
	8	Record Keeping	Applicable Requirements – Conditions RK17, RK18, RK19, and RK20
	9	Reporting/Notification	Applicable Requirements – Conditions RP17 and RP18

Continued – Section 5. NSR Background

NOC Order of Approval (#04NOC365)

In 2004, under 04NOC365, Paneltech applied to install a phenolic and amino reactor batch process plant. ORCAA conditionally approved this NOC on June 28, 2004, requiring Paneltech to duct emissions from the batch reactor to the RTO and comply with 40 CFR Part 63, Subpart OOO (Amino/Phenolic Resin Plant MACT). The plant includes a heat exchange system (indirect condenser) that uses a chilled mixture of water and ethylene glycol.

Table 13: NOC Approval Order (#04NOC365) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
04NOC365 (6/28/04)	1	Technical Specifications	Ongoing –used as a point of reference for determining future NSR actions.
	2	Use of New Materials - New materials containing TAPs must be approved by ORCAA prior to use.	Applicable Requirement – Condition FW17, used as a point of reference for determining future NSR actions.
	3	Operation and Maintenance	Applicable Requirements – Conditions FW18, AR2.0, AR2.1, AR2.12, and M3
	4	Stack Testing	Applicable Requirements – Conditions M3 and M8
	5	Performance Monitoring	Applicable Requirements – Conditions M3, M5, M7, M8, M9, M13, and M14
	6	Heat Exchange System Leak Detection	Applicable Requirements – Conditions AR2.9 and M12
	7	Resin Plant Leak Detection	Applicable Requirements – Conditions AR2.2, AR2.4, M3, M4, M5, M7, M8, M9, M13, M14, M15, M16, M17, M18, M19, and M20
	8	Record Keeping	Applicable Requirements – Conditions RK9, RK12, RK13, RK14, RK15, RK17, RK18, RK19, RK20, RK22, and RK23
	9	Reporting/Notification	Applicable Requirements – Conditions RP5, RP6, RP9, RP11, RP16

Continued – Section 5. NSR Background

NOC Order of Approval (#05NOC428)

In 2005, under 05NOC428, Paneltech applied to dispose of small quantities of process water contaminated with resin precursors in the RTO. ORCAA conditionally approved this NOC on June 13, 2005, provided pressure in the waste water line just prior to the nozzle in the RTO does not exceed 100 psi.

Table 14: NOC Approval Order (#05NOC428) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
05NOC428 (6/13/05)	1	Pressure in the waste water line shall not exceed 100 psi just prior to the spray nozzles in the RTO	Applicable Requirement – Condition AR2.10

NOC Order of Approval (#06NOC469)

In 2006, Paneltech applied to install a composite press and produce rigid panels from resin-impregnated paper. ORCAA conditionally approved this NOC on May 8, 2006, requiring Paneltech to fully enclose the press and duct all emissions to the RTO throughout the pressing and cooling cycles.

Table 15: NOC Approval Order (#06NOC469) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
06NOC469 (5/8/06)	1	Materials Limitation – Only paper impregnated with resin on their paper coating line shall be used in the composite press	Applicable Requirement – Condition AR3.0
	2	Total Enclosure of Press – The press shall be contained in a permanent total enclosure as defined by EPA Method 204 with all emissions ducted to the RTO	Applicable Requirement – Conditions AR3.0, M1, M7, M8, M9, M10, and M11
	3	Initial Enclosure Inspection	Not Ongoing

Continued – Section 5. NSR Background

NOC Order of Approval (#06MOD517)

In 2006, Paneltech applied to change the way potential to emit was calculated. The approved modification resulted in a reduced emission limit and increased operational flexibility.

Table 16: NOC Approval Order (#06MOD517) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
06MOD517 (2/9/07)	1	Technical Specifications	Ongoing – used as a point of reference for determining future NSR actions.
	2	Use of New Materials – new materials containing TAPs must be approved by ORCAA prior to use.	Applicable Requirement – Condition FW17, used as a point of reference for determining future NSR actions.
	3	Plant-Wide Annual Emissions Limitation	Applicable Requirement – Condition FW3
	4	Emission Rate Limitation	Applicable Requirement – Condition AR1.0

NOC Order of Approval (#07NOC561)

In 2007, Paneltech applied to install a resin dryer to cure surplus resins so they could be discarded as solid waste rather than hazardous waste. ORCAA conditionally approved this NOC on November 7, 2007 requiring Paneltech to fully enclose the dryer and duct all emissions to the RTO and defining the dryer as a waste management unit subject to 40 CFR Part 63, Subpart OOO (Amino/Phenolic Resin Plant MACT). Paneltech later reported that they could market large blocks of cured surplus resin as a co-product, resulting in redefinition of the dryer as a resin process unit subject to 40 CFR Part 63 Subpart OOO. Redefinition of the dryer did not require modification of any permit conditions.

Continued – Section 5. NSR Background

Table 17: NOC Approval Order (#07NOC561) Condition Summary

Approval Order (Effective Date)	NOC Conditions	Description	Applicability
07NOC561 (11/7/07)	1	Technical Specifications	Ongoing – used as a point of reference for determining future NSR actions.
	2	Dryer Operation	Applicable Requirement – Conditions AR2.11, M3, M5, M7, M8, M9, M13, and M14
	3	Surplus Resin Characterization	Applicable Requirement – Condition M7(d)
	4	Record Keeping	Applicable Requirement – Condition RK21
	5	Reporting	Applicable Requirement – Condition RP7
	6	Initial Enclosure Inspection	Not Ongoing

Section 6. Applicability of Federal Standards

National Emissions Standards for HAP (NESHAP) – 40 CFR Part 61

EPA has established National Emission Standards for HAP (NESHAP) under Title 40 CFR Part 61 to regulate HAP emissions. Section 111(b) of the Federal Clean Air Act (FCAA) provides authority for EPA to promulgate NSPS which apply only to new and modified sources. The following only relevant NESHAP may apply:

Fugitive Equipment Leaks NESHAP – Title 40 Part 61, Subpart V: Effective since June 6, 1984, the requirements of the Fugitive Equipment Leaks NESHAP apply to each of the following sources that are intended to operate in volatile hazardous air pollutant (VHAP) service: pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and control devices or systems.

Inapplicable: *Paneltech's facility does not operate equipment in VHAP service; therefore, the Fugitive Equipment Leaks NESHAP requirements do not apply to Paneltech.*

National Standards of Performance for New Stationary Sources (NSPS) – 40 CFR Part 60

EPA has established New Source Performance Standards (NSPS) for new, modified or reconstructed facilities and source categories emitting criteria air pollutants under Title 40 CFR Part 60. Section 111(b) of the FCAA provides authority for EPA to promulgate NSPS which apply only to new and modified sources. Once EPA has elected to set an NSPS for new and modified sources in a given source category, section 111(d) of the FCAA calls for regulation of existing sources. The following two relevant NSPS may apply:

Organic Liquid Storage NSPS – Title 40 CFR Part 60, Subpart Kb: Effective since April 8, 1987, the requirements of the Organic Liquid Storage NSPS apply to facilities that have storage vessels with a capacity greater than or equal to 75 cubic meters that are used to store volatile organic liquids (including petroleum liquid) for which construction, reconstruction, or modification commenced after July 23, 1984.

Inapplicable: *All organic liquid storage vessels considered collectively in EU2 have capacities less than 75 cubic meters; therefore, the Organic Liquid Storage NSPS requirements do not apply to Paneltech.*

Chemical Manufacturing Equipment Leaks NSPS – Title 40 CFR part 60, Subpart VV: Effective since October 18, 1983, the requirements of the Chemical Manufacturing Equipment Leaks NSPS apply to facilities involved in the synthetic organic chemical manufacturing industry that commenced construction, reconstruction, or modification after January 5, 1981, and on or before November 7, 2006.

Inapplicable: *Paneltech's facility does not produce any synthetic organic chemical defined in 40 CFR 60.489; therefore, the Chemical Manufacturing Equipment Leaks NSPS requirements do not apply to Paneltech.*

Continued – Section 6. Applicability of Federal Standards

National Emissions Standards for HAP for Source Categories (MACT) – 40 CFR Part 63

EPA has established Maximum Achievable Control Technology (MACT) standards under Title 40 CFR Part 63 to regulate HAP emissions from major and area sources of HAP. As defined in section 112(a) of the FCAA, a major source means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of hazardous air pollutants. An area source, as defined in section 112(a) of the FCAA, is any stationary source of hazardous air pollutants that is not a major source.

General Provisions – Title 40 CFR part 63, Subpart A

If a MACT from 40 CFR Part 63 applies to an emission unit, certain requirements from 40 CFR Part 63, Subpart A are triggered and also apply. Subpart A includes general provisions and requirements for record keeping, notifications, testing and monitoring, but does not contain any applicable emissions limitations. Since the paper coating and curing line (EU-1) and the resin plant (EU-2) at Paneltech are subject to MACT standards, requirements from Subpart A also apply and are worked into Paneltech’s AOP.

Only those requirements from Subpart A that apply to Paneltech on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Paneltech from the requirements if they are triggered by some future action. Table 18 below lists all requirements from 40 CFR Part 63, Subpart A that apply to each emissions unit, and shows the corresponding AOP condition incorporating each requirement.

Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1	“Applicability”		
40 CFR 63.1(a)(1)	General Applicability	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(a)(2)		Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(a)(3)		Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(a)(4)		Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(a)(6)		Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(a)(7)-(8)		Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 17: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1(a)(10)-(14)	General Applicability	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(b)(2)	Initial Applicability Determination	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(b)(3)	Initial Applicability Determination	Yes, although, no ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	N/A
40 CFR 63.1(c)(1)	Applicability After Standard Established	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(c)(4)	Applicability After Standard Established	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.1(c)(5)	Applicability After Standard Established	Yes, although, no ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	N/A
40 CFR 63.1(e)	Applicability After Standard Established	Yes, although, no ongoing requirements for EU2, and EU4. Paragraph (4) doesn't apply to EU1 and EU3.	N/A
40 CFR 63.2	Definitions	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Additional definitions specified in Subparts SS, UU, OOO, JJJJ, and DDDDD	N/A
40 CFR 63.3	Units and Abbreviations	Yes, although, no ongoing requirements for EU1, EU3, and EU4. Only paragraphs (a)-(c) apply to EU1 and EU3.	N/A
40 CFR 63.4	"Prohibited Activities and Circumvention"		
40 CFR 63.4(a)(1)-(3)	Prohibited Activities	Yes, ongoing requirements for EU1 EU2, EU3, and EU4.	G12
40 CFR 63.4(a)(5)	Reserved	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.4(b)-(c)	Circumvention	Yes, ongoing requirements for EU1 EU2, EU3, and EU4.	G11
40 CFR 63.4(c)	Fragmentation	Yes, ongoing requirements for EU1 EU2, EU3, and EU4.	G10
40 CFR 63.5	"Preconstruction Review and Notification Requirements"		
40 CFR 63.5(a)(1)-(2)	Applicability	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. The terms "emissions unit", "source" and "stationary source" should be interpreted as having the same meaning as "affected source."	N/A
40 CFR 63.5(b)(1)	Compliance dates for construction and reconstruction	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Subparts under 40 CFR Part 63 may specify when construction or reconstruction is subject to new source standards.	N/A
40 CFR 63.5(b)(3)-(6)	Requirements for existing, newly constructed, and reconstructed sources	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Subparts under 40 CFR Part 63 may specify when construction or reconstruction is subject to new source standards.	N/A
40 CFR 63.5(d)(1)(i)	General application requirements for approval of construction or reconstruction	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Except that the references to the Initial Notification and 40 CFR 63.9(b)(5) do not apply for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.5(d)(1)(ii)	Separate application	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Except that 40 CFR 63.5(d)(1)(ii)(H) does not apply for EU2.	N/A
40 CFR 63.5(d)(1)(iii)	Estimates or preliminary information	Yes, although, no ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	N/A
40 CFR 63.5(d)(2)	Application for approval of construction	Yes, although, no ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	N/A
40 CFR 63.5(d)(3)	Application for approval of construction or reconstruction	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Except 40 CFR 63.5(d)(3)(ii) does not apply to EU2, and equipment leaks subject to 40 CFR 63.1410 are exempt.	N/A
40 CFR 63.5(d)(4)	Additional information	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.5(e)	Approval of construction or reconstruction	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.5(f)(1)-(2)	Approval of construction or reconstruction based on prior State preconstruction review	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.6	"Compliance Requirements"		
40 CFR 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Applies only when capture and control system is used to comply with a standard.	N/A
40 CFR 63.6(b)(1)-(5)	Compliance dates for new and reconstructed sources	Yes, although, no ongoing requirements for EU2, and EU4. Doesn't apply to EU1 and EU3.	N/A
40 CFR 63.6(b)(7)	Compliance dates for new and reconstructed sources	Yes, although, no ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	N/A
40 CFR 63.6(c)(1)	Compliance Dates	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4. Except 40 CFR 63.1401 specifies the compliance date for EU2.	N/A
40 CFR 63.6(c)(2)	Compliance Dates	Yes, although, no ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	N/A
40 CFR 63.6(c)(5)	Compliance Dates	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.6(e)(1)(i)	Operation and Maintenance	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4. General duty to operate and maintain applies to all emissions units.	FW18, AR1.9, AR1.10, AR3.9, and AR3.10
40 CFR 63.6(e)(1)(ii)	Malfunctions	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.6 and AR3.6
40 CFR 63.6(e)(1)(iii)	Enforcement	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.6(e)(2)	Reserved	Yes, although, no ongoing requirements for EU1 EU2, EU3, and EU4.	N/A
40 CFR 63.6(e)(3)(i)	Startup, shutdown and malfunction plan (SSMP)	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(e)(3)(i)(A)	General duty to minimize emissions	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.10(b) and AR3.10(b)
40 CFR 63.6(e)(3)(i)(B)	Minimize excess emissions of HAP	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.7 and AR3.7

Continued – Section 6. Applicability of Federal Standards

Continued – Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.6(e)(3)(i)(C)	Reduce reporting burden	Yes, although, no ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	N/A
40 CFR 63.6(e)(3)(ii)	Reserved	Yes, although, no ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	N/A
40 CFR 63.6(e)(3)(iii)	SSMP Recordkeeping	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK11
40 CFR 63.6(e)(3)(iv)	SSMP Recordkeeping and Reporting	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9, RK11, RP5, RP11, and RP13
40 CFR 63.6(e)(3)(v)	Maintenance plan requirements	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK11
40 CFR 63.6(e)(3)(vi)	SOP or OSHA or other plan	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(e)(3)(vii)	SSMP changes	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(e)(3)(vii)(A)	SSMP revisions requirements	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(e)(3)(vii)(B)	SSMP revisions requirements	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(e)(3)(vii)(C)	SSMP revisions requirements	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(e)(3)(viii)	SSMP periodic revisions	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(e)(3)(ix)	SSMP development	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR3.8
40 CFR 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.2 and AR1.3
40 CFR 63.6(f)(2)(i)	Compliance determination via performance testing	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	M2, M3, M4, and M5
40 CFR 63.6(f)(2)(ii)	Other compliance determination requirements	Yes, ongoing requirements for EU1 EU2, EU3, and EU4. Except that 40 CFR 63.6(f)(2)(ii) does not apply to equipment leaks subject to 40 CFR 63.1410.	M2, M3, M4, and M5
40 CFR 63.6(f)(2)(iii)	Performance testing at startup	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4. Except 40 CFR 63.7(c), as referred to in 40 CFR 63.6(f)(2)(iii)(D), does not apply to equipment leaks subject to 40 CFR 63.1410.	N/A
40 CFR 63.6(f)(3)	Finding of compliance	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.6(g)	Use of an Alternative Standard	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.6(i)(1)-(3)	Extension of Compliance	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.6(i)(4)(i)(A)	Request to administrator	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.6(i)(4)(i)(B)	Request to administrator	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP5
40 CFR 63.6(i)(4)(i)(C)	Request to administrator	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP5

Continued – Section 6. Applicability of Federal Standards

Continued – Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.6(i)(4)(ii)	Request to administrator	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP5
40 CFR 63.6(i)(5)-(14)	Extension of Compliance	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP5
40 CFR 63.6(i)(16)	Granting of extensions	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.6(j)	Presidential Compliance Exemption	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.7	"Performance Testing Requirements"		
40 CFR 63.7(a)(1)	Performance testing applicability	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.7(a)(2)	Performance test dates	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2. 40 CFR 63.1417(e) specifies the submittal dates of performance test results for all emission points in EU2 except equipment leaks; for equipment leaks, compliance demonstration results are reported in the Compliance Reports.	M2, M3, and M4
40 CFR 63.7(a)(3)	Performance authorized by section 114 of FCAA	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.7(a)(4)	Force Majeure	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.7(b)	Notification of Performance Test	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP17
40 CFR 63.7(c)	Quality Assurance Program	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	M9
40 CFR 63.7(d)	Performance testing facilities	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	FW19
40 CFR 63.7(e)(1)	Performance test requirements	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4. All performance tests shall be conducted at maximum representative operating conditions achievable at the time without disruption of operations or damage to equipment.	M2,M3,M4, and M8
40 CFR 63.7(e)(2)	Performance test requirements	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	G2, M2,M3,M4, and M8
40 CFR 63.7(e)(3)	Performance test requirements	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	M2,M3,M4, and M8
40 CFR 63.7(e)(4)	Performance test requirements	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	M2,M3,M4, and M8
40 CFR 63.7(f)	Use of alternative test method	Yes, although, there are no ongoing requirements for EU1 and EU2.	G14
40 CFR 63.7(g)	Data analysis, recordkeeping, and reporting	Yes, there are ongoing requirements for EU1 and EU2. Except that the requirements in 40 CFR 63.1417(e) shall apply instead of the references to the Notification of Compliance Status report in 40 CFR 63.9(h). In addition, equipment leaks subject to 40 CFR 63.1410 are not required to conduct performance tests.	M11, RK9, RK16, and RP14
40 CFR 63.7(h)	Waiver of performance test	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP5 and G15

Continued – Section 6. Applicability of Federal Standards

Continued – Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.8	“Monitoring Requirements”		
40 CFR 63.8(a)(1)	Applicability	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.8(a)(2)	CMS requirements	Yes, ongoing requirements for EU1, EU3, EU4, and EU4. Doesn't apply to EU2.	M2 and M9
40 CFR 63.8(a)(4)	Additional monitoring requirements	Yes, although, no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.8(b)(1)	Conduct of monitoring	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	G16
40 CFR 63.8(b)(2)	Combined emissions stream CMS requirements	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	M7
40 CFR 63.8(b)(3)	Multiple CMS reporting	No and this is not an ongoing requirement for EU1, EU2, EU3, and EU4. Only one CMS is used.	N/A
40 CFR 63.8(c)(1)	Operation and maintenance of continuous monitoring systems	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	M2, M3, M4, and M9
40 CFR 63.8(c)(1)(i)	CMS maintenance and operation	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	M2 and M9
40 CFR 63.8(c)(1)(ii)	CMS maintenance and operation	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	M2 and M9
40 CFR 63.8(c)(1)(iii)	CMS SSMP requirement	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	AR1.8 and AR2.8
40 CFR 63.8(c)(2)(i)	CMS representative requirements	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	M9
40 CFR 63.8(c)(2)(ii)	CMS representative requirements	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	M9
40 CFR 63.8(c)(3)	CMS verification requirements	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	M9
40 CFR 63.8(c)(4)	Continuous operation	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9
40 CFR 63.8(c)(6)	CMS that is not a CPMS requirements	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9
40 CFR 63.8(c)(7)	Definition of a CMS that is out-of-control	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9
40 CFR 63.8(c)(8)	CMS out-of-control requirements	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9
40 CFR 63.8(d)(1)	CMS Quality control program	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9
40 CFR 63.8(d)(2)	CMS Quality control program protocol	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9
40 CFR 63.8(d)(3)	CMS Quality control program recordkeeping	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	RK17
40 CFR 63.8(e)(1)	CMS performance evaluation	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9
40 CFR 63.8(e)(2)	CMS performance evaluation initial notification	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	RP5
40 CFR 63.8(e)(3)	CMS performance evaluation reporting	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	RP5
40 CFR 63.8(e)(4)	CMS performance evaluation conduct	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	M9

Continued – Section 6. Applicability of Federal Standards

Continued – Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.8(e)(5)	CMS reporting performance evaluation results	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2	RP12
40 CFR 63.8(f)(1)-(3)	Use of an alternative monitoring method	Yes, ongoing requirement for EU1, EU2, EU3, and EU4.	RP5 and G16
40 CFR 63.8(f)(4)	Use of an alternative monitoring method reporting	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP5 and G16
40 CFR 63.8(f)(5)	Use of an alternative monitoring method reporting	Yes, ongoing requirement for EU1, EU2, EU3, and EU4. Except (f)(5)(ii) doesn't apply to EU2.	RP5 and G16
40 CFR 63.9	"Notification Requirements"		
40 CFR 63.9(a)	Applicability and general information	Yes, although, there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.9(b)(1)(ii)	Initial notifications	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP6
40 CFR 63.9(b)(2)	Initial notification when start-up was before the effective date	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP6
40 CFR 63.9(b)(3)-(5)	Initial notification for new and reconstructed affected sources	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP6
40 CFR 63.9(c)	Request for extension of compliance	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP5
40 CFR 63.9(d)	Notification that source is subject to special compliance requirement	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP6
40 CFR 63.9(e)	Notification of performance testing	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP6 and RP17
40 CFR 63.9(f)	Notification of opacity and visible emission observations with a CMS	No and there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.9(g)	Additional notification requirements for sources with a CMS	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP5 and RP6
40 CFR 63.9(h)	Notification of compliance status	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP6
40 CFR 63.9(i)	Adjustment of Submittal Deadlines	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP6
40 CFR 63.9(j)	Change in information already provided	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP6
40 CFR 63.10	"Recordkeeping and Reporting Requirements"		
40 CFR 63.10(a)	Applicability and General Information	Yes, although, there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.10(b)(1)	General recordkeeping	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK9
40 CFR 63.10(b)(2)(i)	Startup and shutdown recordkeeping requirements	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK9 and RK11
40 CFR 63.10(b)(2)(ii)	Malfunction shutdown recordkeeping requirements	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK11
40 CFR 63.10(b)(2)(iii)	Maintenance recordkeeping requirements	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK22

Continued – Section 6. Applicability of Federal Standards

Continued – Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.10(b)(2)(iv)(A)	Startups and shutdowns exceedances different from SSMP	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK11
40 CFR 63.10(b)(2)(iv)(B)	Malfunctions exceedances different from SSMP	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK11
40 CFR 63.10(b)(2)(v)	Startups, shutdowns and malfunctions exceedances consistent with SSMP	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK11
40 CFR 63.10(b)(2)(vi)	CMS malfunctioning records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(b)(2)(vii)	Data measurement records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK18
40 CFR 63.10(b)(2)(vii)(A)-(B)	CEMS measurement records	No and there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.10(b)(2)(vii)(C)	Administrator records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK18
40 CFR 63.10(b)(2)(viii)	Performance records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(b)(2)(ix)	Conditions of performance tests	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK18
40 CFR 63.10(b)(2)(x)	CMS calibration check records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(b)(2)(xi)-(xiv)	Other documentation recordkeeping	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK9
40 CFR 63.10(b)(3)	Applicability determinations records	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK10
40 CFR 63.10(c)(1)	Additional CMS requirements	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(c)(5)	Inoperative CMS records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(c)(6)	Out-of-control CMS records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(c)(7)	CMS excess emissions records during startups, shutdowns and malfunctions	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK11
40 CFR 63.10(c)(8)	CMS excess emissions records other than during startups, shutdowns and malfunctions	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK11
40 CFR 63.10(c)(10)	Malfunction records	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK11
40 CFR 63.10(c)(11)	Malfunction records	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK11
40 CFR 63.10(c)(12)	CMA repairs and adjustments records	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(c)(13)	Process operating time	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RK17
40 CFR 63.10(c)(14)	Quality control program records	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK17
40 CFR 63.10(c)(15)	Use of SSMP records to satisfy some recordkeeping	Yes, ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	RK9 and RK11

Continued – Section 6. Applicability of Federal Standards

Continued – Table 18: 40 CFR Part 63, Subpart A Applicability to All Emissions Units

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.10(d)(1)	Progress Reports for Sources With Compliance Extensions	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP5
40 CFR 63.10(d)(2)	Reporting results of performance tests	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP5
40 CFR 63.10(d)(3)	Reporting results of opacity observations	Yes, although, there are no ongoing requirements for EU1 and EU3. Doesn't apply to EU2, and EU4.	N/A
40 CFR 63.10(d)(4)	Progress reports	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP5
40 CFR 63.10(d)(5)	Periodic startup, shutdown, and malfunction reports	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP5
40 CFR 63.10(e)(1)	CEMS general	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.10(e)(2)(i)	CMS performance evaluation reporting	Yes, ongoing requirements for EU1, EU3, and EU4. Doesn't apply to EU2.	RP5
40 CFR 63.10(e)(2)(ii)	COMS performance evaluation reporting	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.10(e)(3)	Excess emissions reporting	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.10(e)(4)	Reporting continuous opacity	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.10(f)	Recordkeeping/Reporting Waiver	Yes, ongoing requirements for EU1, EU2, EU3, and EU4.	RP5 and G17
40 CFR 63.11	"Control Device and Work Practice Requirements"		
40 CFR 63.11(a)	Applicability	Yes, although, there are no ongoing requirements for EU1, EU2, and EU3. Doesn't apply to EU4.	N/A
40 CFR 63.11(b)	Flares	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.11(c)	Alternative work practices	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.11(d)	Alternative work practices	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.11(e)	Alternative work practices	No and there are no ongoing requirement for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.12	State Authority and Delegations	Yes, although, there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes, although, there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.14	Incorporation by Reference	Yes, although, there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A
40 CFR 63.15	Availability of Information and Confidentiality	Yes, although, there are no ongoing requirements for EU1, EU2, EU3, and EU4.	N/A

Continued – Section 6. Applicability of Federal Standards

Closed Vent Systems MACT– Title 40 CFR Part 63, Subpart SS

Effective since June 29, 1999, the requirements of the Closed Vent Systems MACT apply to process vents, storage vessels, transfer racks, closed vent systems, control devices and routing of air emissions to a fuel gas system or process that meet the requirements of the subpart. The requirements in the Closed Vent Systems MACT apply when another subpart of Title 40 CFR Part 63 references the use of the Closed Vent Systems MACT for such air emission control.

Only those requirements from Subpart SS that apply to Paneltech on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Paneltech from the requirements if they are triggered by some future action. Table 19 below lists all requirements from 40 CFR Part 63, Subpart SS that apply to EU-2, and shows the corresponding AOP condition incorporating each requirement.

Applicable: *Certain physical standards of the Closed Vent Systems MACT are adopted by reference into Subpart OOO, but the Closed Vent Systems MACT itself does not apply to Paneltech’s facility.*

Table 19: 40 CFR Part 63 Subpart SS Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.980	Referencing subpart applicability.	Yes, although, there are no ongoing requirement for EU2; 40 CFR Part 63, Subpart UU was referenced by 40 CFR Part 63, Subpart UU.	N/A
40 CFR 63.981	Definitions	Yes, although, there are no ongoing requirement for EU2.	N/A
40 CFR 63.982	“Requirements”		
40 CFR 63.982(a)	Referencing subpart applicability.	Yes, ongoing requirement for EU2. 40 CFR Part 63, Subpart SS was referenced by 40 CFR Part 63, Subpart OOO	AR2.5
40 CFR 63.982(b)	Closed vent system and flare	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.982(c)	Closed vent system and nonflare control device	Yes, ongoing requirements for EU2.	AR2.5
40 CFR 63.982(d)	Route to a fuel gas system or process	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.982(e)	Final recovery devices	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.982(f)	Combined emissions	No and there are no ongoing requirements for EU2. Provisions in 40 CFR 63.1403(b) are to be followed for combined vent streams	AR2.5

Continued – Section 6. Applicability of Federal Standards

Continued – Table 19: 40 CFR Part 63 Subpart SS Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.983	“Closed Vent Systems”		
40 CFR 63.983(a)(1)	Collection of emissions	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.983(a)(2)	Period of operation	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.983(a)(3)	Bypass monitoring	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.983(a)(4)	Loading arms at transfer racks	No and not an ongoing requirement for EU2. No transfer rack equipment installed.	N/A
40 CFR 63.983(a)(5)	Pressure relief devices in a transfer rack’s closed vent system	No and not an ongoing requirement for EU2. No transfer rack equipment installed.	N/A
40 CFR 63.983(b)	Monitoring requirements – inspection reports	Yes, ongoing requirements for EU2.	RP5, RP11, and RK12
40 CFR 63.983(b)(1)	Applicability of requirements	Yes, ongoing requirements for EU2.	M5 and M13
40 CFR 63.983(b)(1)(i)	Hard-piped closed vent system	Yes, ongoing requirements for EU2.	M5 and M13
40 CFR 63.983(b)(1)(ii)	Ductwork closed vent system	Yes, ongoing requirements for EU2.	M5 and M13
40 CFR 63.983(b)(2)	Unsafe-to-inspect requirements	Yes, ongoing requirements for EU2.	M5 and M13
40 CFR 63.983(b)(3)	Difficult-to-inspect requirements	Yes, ongoing requirements for EU2.	M5 and M13
40 CFR 63.983(b)(4)	Bypass-line requirements	Yes, ongoing requirements for EU2.	M5 and M13
40 CFR 63.983(c)	Closed vent system inspection procedures	Yes, ongoing requirements for EU2.	M5 and M13
40 CFR 63.983(d)	Closed vent system leak repair procedures	Yes, ongoing requirements for EU2.	M5 and M14
40 CFR 63.984	“Fuel Gas Systems and Processes”		
40 CFR 63.984(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.984(b)	Compliance assessment	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.984(c)	Statement of connection	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.985	“Nonflare Control Devices – Storage Vessels and Low Throughput Transfer Racks”		
40 CFR 63.985(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.985(b)	Design evaluation or performance test requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.985(c)	Monitoring requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.986	“Nonflare Control Devices – Equipment Leaks Only”		
40 CFR 63.986(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.986(b)	Performance test requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.986(c)	Monitoring requirements	No and there are no ongoing requirements for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 19: 40 CFR Part 63 Subpart SS Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.987	“Flare Requirements”		
40 CFR 63.987(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.987(b)	Flare compliance assessment	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.988	“Incinerators, Boilers, and Process Heaters”		
40 CFR 63.988(a)(1)-(2)	Equipment and operating requirements	Yes, ongoing requirements for EU2.	AR2.5
40 CFR 63.988(a)(3)	Additional requirements for boilers and process heaters	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.988(b)	Initial performance test, recordkeeping and reporting	Yes, although there are no requirements for EU2. Except initial performance testing has been conducted.	N/A
40 CFR 63.988(c)	Monitoring requirements	Yes, ongoing requirements for EU2.	M9
40 CFR 63.989	Reserved	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.990	“Absorbers, Condensers, and Carbon Absorbers Used As Control Devices”		
40 CFR 63.990(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.990(b)	Performance test requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.990(c)	Monitoring requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.991	Reserved	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.992	“Implementation and Enforcement”		
40 CFR 63.992(a)	Implementation and enforcement	Yes, although there are no requirements for EU2.	N/A
40 CFR 63.992(b)	Retention and transfer requirements	Yes, although there are no requirements for EU2.	N/A
40 CFR 63.992(c)	Approval of alternatives	Yes, although there are no requirements for EU2.	N/A
40 CFR 63.993	“Final Recovery Devices”		
40 CFR 63.993(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.993(b)	Performance test requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.993(c)	Monitoring requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.994	“Halogen Scrubbers and Other Halogen Reduction Devices”		
40 CFR 63.994(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.994(b)	Performance test requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.994(c)	Monitoring requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.995	“Other Control Devices”		
40 CFR 63.995(a)	Equipment and operating requirements	No and there are no ongoing requirements for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 19: 40 CFR Part 63 Subpart SS Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.995(b)	Performance test requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.995(c)	Monitoring requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.996	“General Monitoring Requirements for Control and Recovery Devices”		
40 CFR 63.996(a)(1)	General monitoring requirements applicability	Yes, ongoing requirements for EU2.	AR2.5, M5, and M9
40 CFR 63.996(a)(2)	General flare requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.996(a)(3)	General flow indicator requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.996(b)(1)	Conduct of monitoring	Yes, ongoing requirements for EU2.	M5 and M9
40 CFR 63.996(b)(2)	Backup CPMS requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.996(c)(1)	General maintenance, installation and calibration of CPMS	Yes, ongoing requirements for EU2.	M5 and M9
40 CFR 63.996(c)(2)	General CPMS operation	Yes, ongoing requirements for EU2.	M5 and M9
40 CFR 63.996(c)(3)	CPMS performance testing conduct	Yes, ongoing requirements for EU2.	M5 and M9
40 CFR 63.996(c)(4)	CPMS installation requirements	Yes, ongoing requirements for EU2.	M5 and M9
40 CFR 63.996(c)(5)	CPMS monitoring exemptions	Yes, ongoing requirements for EU2.	M5 and M9
40 CFR 63.996(c)(6)	Operation range of control device	Yes, although there are no ongoing requirements for EU2. The range for monitored parameters has been established.	N/A
40 CFR 63.996(d)(1)	Alternatives to monitoring requirements	Yes, ongoing requirements for EU2.	G16
40 CFR 63.996(d)(2)	Monitoring a different parameter	Yes, although there are no ongoing requirements for EU2.	N/A
40 CFR 63.997	“Performance Test and Compliance Assessment Requirements for Control Devices”		
40 CFR 63.997(a)	Performance test and flare compliance assessments	Yes, although there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(b)	Prior test results and waivers	No and there are no ongoing requirements for EU2. Initial testing has already been performed.	N/A
40 CFR 63.997(c)(1)	Performance tests and flare compliance assessments schedule	Yes, although there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(c)(2)	Section 114 of FCCA	Yes, ongoing requirements for EU2.	FW19
40 CFR 63.997(c)(3)	Replacement of existing control device with recovery device	Yes, although there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(d)(1)	Performance testing facilities	Yes, ongoing requirements for EU2.	FW19
40 CFR 63.997(d)(2)-(5)	Performance testing facilities	Yes, ongoing requirements for EU2.	FW19
40 CFR 63.997(e)(1)(i)	General procedures for continuous unit operations	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(e)(1)(iii)	General procedures for both continuous and batch unit operations	Yes, ongoing requirements for EU2.	M5 and M8

Continued – Section 6. Applicability of Federal Standards

Continued – Table 19: 40 CFR Part 63 Subpart SS Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.997(e)(1)(iv)	Alternatives to performance test requirements	Yes, ongoing requirements for EU2.	G14
40 CFR 63.997(e)(1)(v)(A)	Transfer rack requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(e)(1)(v)(B)	Intermittent vapor processing systems	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(e)(2)	Specific procedures	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(i)	Selection of sampling sites	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(i)	Gas volumetric flow rate	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(iii)	Total organic regulated material or TOC concentration	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(e)(2)(iv)	Percent reduction calculation	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(iv)(A)	Sampling time	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(iv)(B)	Mass rate of TOC or total organic regulated material	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(iv)(C)	Percent reduction in TOC or total organic regulated material for continuous unit operations and a combination of both continuous and batch unit operations	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(iv)(D)-(E)	Other testing requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(e)(2)(iv)(F)	Inlet and outlet concentration requirements	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(iv)(G)	Other inlet and outlet concentration requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.997(e)(2)(iv)(H)	Method 25A	Yes, ongoing requirements for EU2.	M8
40 CFR 63.997(e)(2)(iv)(I)	Formaldehyde requirements	Yes, ongoing requirements for EU2.	M8
40 CFR 63.998	“Recordkeeping Requirements”		
40 CFR 63.998(a)(1)	Conditions of flare compliance assessment, monitoring, and compliance records	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(a)(2)(i)	Nonflare control device performance test records – availability of performance test records	Yes, ongoing requirements for EU2.	RK9 and RK20
40 CFR 63.998(a)(2)(ii)(A)	General recordkeeping requirements for nonflare control devices	Yes, ongoing requirements for EU2.	RK9 and RK20
40 CFR 63.998(a)(2)(ii)(B)(1)	Nonflare combustion device requirements	Yes, ongoing requirements for EU2.	RK9 and RK20
40 CFR 63.998(a)(2)(ii)(B)(2)	Catalytic incinerators	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(a)(2)(ii)(B)(3)	Boiler or process heater	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(a)(2)(ii)(B)(4)	Incinerator	Yes, ongoing requirements for EU2.	RK9 and RK20

Continued – Section 6. Applicability of Federal Standards

Continued – Table 19: 40 CFR Part 63 Subpart SS Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.998(a)(2)(ii)(C)	Other nonflare control devices	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(a)(2)(ii)(D)	Halogen reduction devices	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(a)(3)	Recovery device monitoring records during TRE index value determination	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(a)(4)	Halogen concentration records	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(b)(1)	Continuous records and monitoring system data handling	Yes, ongoing requirements for EU2.	RK19
40 CFR 63.998(b)(2)	Excluded data	Yes, ongoing requirements for EU2.	M9
40 CFR 63.998(b)(3)	Records of daily averages	Yes, ongoing requirements for EU2.	RK9, RK18, and RP6
40 CFR 63.998(b)(5)	Alternative recordkeeping	Yes, although there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(b)(6)	Excursions	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(c)(1)(i) and (ii)(A)-(C)	Nonflare control and recovery device regulated source monitoring records	Yes, ongoing requirements for EU2.	RK9, RK17, and RK18
40 CFR 63.998(c)(2)	Combustion control and halogen reduction device monitoring records	Yes, ongoing requirements for EU2.	RK18
40 CFR 63.998(c)(3)	Regulated source and control equipment startup, shutdown, and malfunction records	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.998(c)(4)	Equipment leak records	Yes, ongoing requirements for EU2.	RK9
40 CFR 63.998(c)(5)	Records of monitored parameters outside of range	Yes, ongoing requirements for EU2.	RK9 and RP11
40 CFR 63.999	“Notifications and other reports”		
40 CFR 63.999(a)(1)	Performance test and flare compliance assessment notifications and reports – general requirements	Yes, ongoing requirements for EU2.	RP6 and RP17
40 CFR 63.999(a)(2)	Performance test and flare compliance report submittal and content requirements	Yes, ongoing requirements for EU2.	RP6 and RP18
40 CFR 63.999(b)(1)	Notification of compliance – Routing storage vessel or transfer emissions to a process of fuel gas system	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.999(b)(2)	Routing storage vessel or low throughput transfer rack emissions to a Nonflare control device	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.999(b)(3)	Operating range for monitored parameters	Yes, ongoing requirements for EU2.	RP6
40 CFR 63.999(b)(4)	Halogen reduction device	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.999(c)	Periodic reports	Yes, ongoing requirements for EU2.	RP5 and RP11
40 CFR 63.999(d)	Requests for approval of monitoring alternatives	Yes, ongoing requirements for EU2.	G16

Continued – Section 6. Applicability of Federal Standards

Equipment Leaks MACT – Title 40 CFR Part 63, Subpart UU

Effective since June 29, 1999, the requirements of the Equipment Leaks MACT apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and closed vent systems and control devices that meet the requirements of the subpart. The requirements in the Equipment Leaks MACT apply when another subpart of Title 40 CFR Part 63 references the use of the Equipment Leaks MACT for such air emission control.

Only those requirements from Subpart UU that apply to Paneltech on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Paneltech from the requirements if they are triggered by some future action. Table 20 below lists all requirements from 40 CFR Part 63, Subpart UU that apply to EU-2, and shows the corresponding AOP condition incorporating each requirement.

Applicable: *Referenced by Subpart OOO of Title 40 Part 63, therefore, the requirements of the Equipment Leaks MACT apply to all valves, connectors, pumps and pressure relief devices in contact with regulated material that are part of EU2. All applicable Equipment Leaks MACT requirements have been integrated into the AOP and are summarized in Tables 20. The provisions of 40 CFR Part 63, Subpart A (General Provisions) do not apply to the Equipment Leaks MACT except as noted in the referencing Subpart OOO of Title 40 Part 63.*

Table 20: 40 CFR Part 63 Subpart UU Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1019	“Applicability”		
40 CFR 63.1019(a)	Referencing subpart applicability.	Yes, although, there no ongoing requirement for EU2; 40 CFR Part 63, Subpart UU was referenced by 40 CFR Part 63, Subpart OOO	N/A
40 CFR 63.1019(b)	Equipment subject to the subpart	Yes, although, there no ongoing requirement for EU2.	N/A
40 CFR 63.1019(c)	Equipment in vacuum service exclusion	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1019(d)	Equipment in service less than 300 hours per calendar year exemption	Yes, although, there are no ongoing requirement for EU2. Phenol and formaldehyde transfer lines and associated pumps and valves run less than 300 hours per calendar year. Does not apply if equipment exceeds 300 hours.	N/A
40 CFR 63.1019(e)	Lines in equipment not containing process fluids non-subjectivity	No and there are no ongoing requirements for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 20: 40 CFR Part 63 Subpart UU Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1019(f)	Implementation and enforcement	Yes, although, not an ongoing requirement for EU2.	N/A
40 CFR 63.102	“Definitions”		
40 CFR 63.1020	Terms and meanings	Yes, although, there no ongoing requirement for EU2.	N/A
40 CFR 63.1021	“Alternative Means of Emission Limitation”		
40 CFR 63.1021(a)	Performance standard non-applicability for pressure relief valves or compressors	Yes, although, there no ongoing requirement for EU2.	N/A
40 CFR 63.1021(b)	Requests by owner or operators of determination of alternative means of emission limitation	Yes, although, there no ongoing requirement for EU2.	N/A
40 CFR 63.1021(c)	Requests by manufacturers of equipment	Yes, although, there no ongoing requirement for EU2.	N/A
40 CFR 63.1021(d)	Permission to use an alternative means of emission limitation	Yes, although, there no ongoing requirement for EU2.	N/A
40 CFR 63.1022	“Equipment Identification”		
40 CFR 63.1022(a)	General equipment identification	Yes, an ongoing requirement for EU2.	RK14
40 CFR 63.1022(b)(1)	Connectors	Yes, an ongoing requirement for EU2.	RK14
40 CFR 63.1022(b)(2)	Routed to a process or fuel gas system or equipped with a closed vent system and control device.	Yes, an ongoing requirement for EU2.	RK14
40 CFR 63.1022(b)(3)	Additional equipment identification for pressure relief valves	Yes, an ongoing requirement for EU2.	RK14
40 CFR 63.1022(b)(4)	Instrumentation systems	Yes, an ongoing requirement for EU2.	RK14
40 CFR 63.1022(c)	Special equipment designations: Equipment that is unsafe or difficult-to-monitor	Yes, an ongoing requirement for EU2.	RK14
40 CFR 63.1022(d)	Equipment that is unsafe-to-repair	Yes, an ongoing requirement for EU2.	RK14
40 CFR 63.1022(e)	Compressors operating with an instrument reading of less than 500 parts per million above background	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1022(f)	Equipment in heavy liquid service	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1023	“Instrument and Sensory Monitoring for Leaks”		
40 CFR 63.1023(a)(1)	Monitoring for leaks	Yes, an ongoing requirement for EU2.	M4 and M15
40 CFR 63.1023(a)(2)	Sensory monitoring for leaks	Yes, paragraph (i) is an ongoing requirement for EU2.	M4 and M15
40 CFR 63.1023(b)	Instrument monitoring methods	Yes, an ongoing requirements for EU2.	M4 and M15
40 CFR 63.1023(c)	Instrument monitoring using background adjustments	Yes, ongoing requirements for EU2 if triggered.	M4 and M15
40 CFR 63.1023(d)	Sensory monitoring methods	Yes, an ongoing requirement for EU2.	M4 and M15
40 CFR 63.1023(e)	Leaking equipment identification and records	Yes, an ongoing requirement for EU2.	RK9 and RK14

Continued – Section 6. Applicability of Federal Standards

Continued – Table 20: 40 CFR Part 63 Subpart UU Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1024	“Leak Repair”		
40 CFR 63.1024(a)	Leak repair schedule	Yes, an ongoing requirement for EU2.	M4 and M15
40 CFR 63.1024(c)(1)	Leak identification removal - valves and connectors in gas/vapor and light liquid service.	Yes, although not an ongoing requirement for EU2.	N/A
40 CFR 63.1024(c)(2)	Other equipment	Yes, although not an ongoing requirement for EU2.	N/A
40 CFR 63.1024(d)	Delay of repair	Yes, an ongoing requirement for valves part of EU2.	M4 and M15
40 CFR 63.1024(e)	Unsafe-to-repair connectors	Yes, an ongoing requirement for valves part of EU2.	M4 and M15
40 CFR 63.1024(f)	Leak repair records	Yes, an ongoing requirement for valves part of EU2.	RK9 and RK14
40 CFR 63.1025	“Valves in gas and vapor Service and in Light Liquid Service Standards”		
40 CFR 63.1025(a)	Valves in gas and vapor service and in light liquid service standards - Compliance schedule	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1025(b)(1)	Monitoring method	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1025(b)(2)	Instrument reading	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1025(b)(3)	Monitoring frequency	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1025(b)(4)	Valve subgrouping	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1025(c)	Percent leaking valve calculations	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1025(d)	Leak repair	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1025(e)	Special provisions for valves	Yes, an ongoing requirement for valves part of EU2.	M4 and M16
40 CFR 63.1026	“Pumps in Light Liquid Service Standards”		
40 CFR 63.1026(a)	Compliance schedule	Yes, an ongoing requirement for the pumps part of EU2.	M4 and M17
40 CFR 63.1026(b)	Leak detection	Yes, ongoing requirements for the pumps part of EU2.	M4 and M17
40 CFR 63.1026(c)	Percent leaking pumps calculation	Yes, there are ongoing requirements for the pumps considered part of EU2 if triggered.	M4 and M17
40 CFR 63.1026(d)	Leak repair	Yes, ongoing requirements for the pumps part of EU2.	M4 and M17
40 CFR 63.1026(e)	Special provisions for pumps	Yes, there are ongoing requirements for the pumps considered part of EU2 if triggered.	M4 and M17
40 CFR 63.1027	“Connectors in Gas and Vapor Service and in Light Service Standards”		
40 CFR 63.1027	Connectors in gas and vapor service and in light liquid service standards	Yes, there are ongoing requirements for the connectors considered part of EU2 if triggered.	M4 and M18
40 CFR 63.1027(a)	Compliance schedule	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18

Continued – Section 6. Applicability of Federal Standards

Continued – Table 20: 40 CFR Part 63 Subpart UU Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1027(b)	Leak detection	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1027(b)(1)	Monitoring method	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1027(b)(2)	Leak definition	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1027(b)(3)	Monitoring periods	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1027(c)	Percent leaking connectors calculation	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1027(d)	Leak repair	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1027(e)(1)	Unsafe-to-monitor connectors	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1027(e)(2)	Inaccessible, ceramic, or ceramic-lined connector special provisions	Yes, ongoing requirements for the connectors part of EU2.	M4 and M18
40 CFR 63.1028	“Agitators in Gas and Vapor Service and in Light Liquid Service Standards”		
40 CFR 63.1028	Agitators in gas and vapor service and in light liquid service standards	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1029	“Equipment in Heavy Liquid Service and Pressure Relief Devices in Liquid Service Standards”		
40 CFR 63.1029	Pumps, valves, connectors, and agitators in heavy liquid service; pressure relief devices in liquid service; and instrumentation systems standards.	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1030	“Pressure Relief Devices in Gas and Vapor Service Standards”		
40 CFR 63.1030(a)	Compliance schedule	Yes, ongoing requirements for pressure relief device part of EU2.	M4 and M19
40 CFR 63.1030(b)	Leak detection	Yes, ongoing requirements for pressure relief device part of EU2.	M4 and M19
40 CFR 63.1030(c)	Leak repair	Yes, ongoing requirements for pressure relief device part of EU2.	M4 and M19
40 CFR 63.1030(d)	Pressure relief devices routed to a process or fuel gas system or equipped with a closed vent system and control device.	Yes, ongoing requirements for pressure relief device part of EU2.	M4 and M19
40 CFR 63.1030(e)	Rupture disk exemption	Yes, ongoing requirements for EU2 if triggered.	M4 and M19
40 CFR 63.1031	Compressor standards	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1032	Sampling connection system standards	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1033	Open-ended valves or lines standards.	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1034	“Closed Vent Systems and Control Device...Standards”		
40 CFR 63.1034(a)	Compliance schedule	Yes, although no ongoing requirements for EU2.	N/A
40 CFR 63.1034(b)(1)	Compliance standard to comply with Subpart SS	Yes, ongoing requirements for EU2.	AR2.5 and AR2.6
40 CFR 63.1034(b)(2)(i)	Nonflare control device standards	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1034(b)(2)(ii)	Enclosed combustion device standards	Yes, ongoing requirements for EU2.	AR2.2

Continued – Section 6. Applicability of Federal Standards

Continued – Table 20: 40 CFR Part 63 Subpart UU Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1035	Quality improvement program for pumps	Yes, ongoing requirements for EU2 if triggered.	M17
40 CFR 63.1036	“Alternative means of emission limitation: Batch processes”		
40 CFR 63.1036(a)	General requirement	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)	Pressure testing of the batch equipment	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)(1)	Reconfiguration	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)(2)	Testing procedures	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)(3)	Leak detection	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)(4)	Leak repair	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)(5)	Gas pressure test procedure for pressure or vacuum loss	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)(6)	Pressure test procedure using test liquid	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(b)(7)	Pressure testing recordkeeping	Yes, ongoing requirements for EU2	RK153
40 CFR 63.1036(c)	Equipment monitoring	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(d)	Added equipment recordkeeping	Yes, ongoing requirements for EU2	RK14
40 CFR 63.1036(e)	Delay of repair	Yes, ongoing requirements for EU2	M4 and M20
40 CFR 63.1036(f)	Periodic report contents	Yes, ongoing requirements for EU2	RP11
40 CFR 63.1037	Alternative means of emission limitation: Enclosed-vented process units or affected facilities	Yes, although no ongoing requirements for EU2.	N/A
40 CFR 63.1038	“Recordkeeping”		
40 CFR 63.1038(a)	Recordkeeping system	Yes, although no ongoing requirements for EU2.	N/A
40 CFR 63.1038(b)	General equipment leak records	Yes, ongoing requirements for EU2	RK9 and RK14
40 CFR 63.1038(c)(1)	Specific equipment records – valves	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1038(c)(2)	Pumps	Yes, ongoing requirements for EU2	RK9 and RK14
40 CFR 63.1038(c)(3)	Connectors	Yes, ongoing requirements for EU2	RK9 and RK14
40 CFR 63.1038(c)(4)	Agitators	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1038(c)(5)	Pressure relief devices	Yes, ongoing requirements for EU2	RK9 and RK14
40 CFR 63.1038(c)(6)	Compressors	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1038(c)(7)	Pump QIP	Yes, ongoing requirements for EU2	RK9 and RK14
40 CFR 63.1038(c)(8)	Alternative – batch process	Yes, ongoing requirements for EU2	RK9 and RK14

Continued – Section 6. Applicability of Federal Standards

Continued – Table 20: 40 CFR Part 63 Subpart UU Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1038(c)(9)	Enclosed-vented process unit alternative	Yes, although no ongoing requirements for EU2.	N/A
40 CFR 63.1039	“Reporting requirements”		
40 CFR 63.1039(a)	Initial Compliance Status report	Yes, although no ongoing requirements for EU2.	RP6
40 CFR 63.1039(b)	Periodic reports	Yes, ongoing requirements for EU2.	RP11

Phenolic Resins Production MACT – Title 40 CFR Part 63, Subpart OOO

Effective since January 20, 2000, the requirements of the Phenolic Resins Production MACT apply to processes that produce amino/phenolic resins and that are located at a plant site that is a major source as defined in Title 40 CFR Part 63, Subpart A.

Only those requirements from Subpart OOO that apply to Paneltech on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Paneltech from the requirements if they are triggered by some future action. Table 21 below lists all requirements from 40 CFR Part 63, Subpart OOO that apply to EU-2, and shows the corresponding AOP condition incorporating each requirement.

Applicable: *Paneltech’s facility includes a batch reactor that produces phenolic resins and is a major source of hazardous air pollutants; therefore, the requirements of the Phenolic Resins Production MACT do apply to EU2. All applicable Phenolic Resins Production MACT requirements have been integrated into the AOP and are summarized in Table 21.*

Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1400	“Applicability and designation of affected sources”		
40 CFR 63.1400(a)	General applicability	Yes, Paneltech produces phenolic resins and is a major source of methanol	N/A
40 CFR 63.1400(b)	Affected source	Yes, although no ongoing requirement for EU2. Paragraphs (b)(1), (2), (3), (5), (7) and (8) apply	N/A
40 CFR 63.1400(b)(1)	Total of all amino/phenolic resin process units (AAPU)	Yes, although no ongoing requirement for EU2. EU2 includes an APPU.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1400(b)(2)	The associated heat exchange systems	Yes, although no ongoing requirement for EU2. The indirect condenser is part of EU2.	N/A
40 CFR 63.1400(b)(3)	Equipment required by, or utilized as a method of compliance with, this subpart which may include control devices and recovery devices	Yes, although no ongoing requirement for EU2. The RTO is used as control device.	N/A
40 CFR 63.1400(b)(4)	Equipment that does not contain organic hazardous air pollutants (HAPs) and is located within an APPU that is part of an affected source	Yes, ongoing requirement for EU2.	N/A
40 CFR 63.1400(b)(5)	Vessels and equipment storing and/or handling material that contain no organic HAP and/or organic HAP as impurities only	Yes, although no ongoing requirement for EU2. Storage vessels of phenol, methanol, and formaldehyde.	N/A
40 CFR 63.1400(b)(6)	Equipment that is intended to operate in organic HAP service for less than 300 hours during the calendar year	Not an ongoing requirement for EU2.	N/A
40 CFR 63.1400(b)(7)	Each waste management unit	Yes, although no ongoing requirement for EU2. The resin dryer is used to manage surplus resin.	N/A
40 CFR 63.1400(b)(8)	Maintenance wastewater	Yes, although no ongoing requirement for EU2. Draining of portions of EU2 for repair	N/A
40 CFR 63.1400(c)	Existing affected source	Yes, although no ongoing requirement for EU2	N/A
40 CFR 63.1400(d)	New affected source	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(e)	APPUs without organic HAPs	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(f)	Exemption from equipment leak provisions	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(g)(1)	Applicability determinations for process units producing multiple products	Yes, although not an ongoing requirement for EU2. Phenolic resin production is the greatest percent of the annual design capacity of EU2 on a mass basis	N/A
40 CFR 63.1400(g)(2)-(4)	Flexible operations process units	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(g)(5)	Annual applicability determination for non-APPUs that have produced amino/phenolic resins	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(g)(6)	Applicability determination for non-APPUs that have not produced amino/phenolic resins	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(g)(7)	Redetermination of applicability to APPU that are flexible operations process units	No and there are no ongoing requirements for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1400 (g)(8)	APPU terminating production of all amino/phenolic resins	Yes, although not an ongoing requirement for EU2.	N/A
40 CFR 63.1400(h)(1)	Storage vessel applicability determination	Not an ongoing requirement for EU2.	N/A
40 CFR 63.1400(h)(2)	Storage vessel applicability determination	Yes, although not an ongoing requirement for EU2. The storage vessels of phenol, methanol and formaldehyde are assigned to EU2.	N/A
40 CFR 63.1400(h)(3)-(4)	Storage vessel applicability determination	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(h)(6)-(8)	Storage vessel applicability determination	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(i)	Applicability of other subparts to this subpart	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1400(j)	Applicability of general provisions	Yes, ongoing requirements for EU2. General provisions of 40 CFR Part 63, Subpart A are summarized in Table 18.	Applicable requirements integrated in AOP
40 CFR 63.1400(k)	Applicability of this subpart during periods of start-up, shutdown, malfunction, or non-operation	Yes, an ongoing requirement for EU2.Paragraphs (k)(1) through (4) apply to EU2.	Applicable requirements integrated in AOP
40 CFR 63.1400(k)(1)	Emission limitations set forth in this subpart	Yes, an ongoing requirement for EU2.	AR2.6
40 CFR 63.1400(k)(2)	Emission limitations set forth in 40 CFR Part 63 Subpart UU	Yes, an ongoing requirement for EU2, summarized in Table 6.3.	AR2.4
40 CFR 63.1400(k)(3)	Equipment that are required or utilized for compliance with this subpart during malfunctions	Yes, an ongoing requirement for EU2 and associated air pollution control and monitoring device.	AR2.13
40 CFR 63.1400(k)(4)	General Duty	Yes, an ongoing requirement for EU2.	AR2.13
40 CFR 63.1401	“Compliance schedule”		
40 CFR 63.1401(a)-(e)	Compliance schedule	Not ongoing requirements for EU2.	N/A
40 CFR 63.1402	“Definitions”		
40 CFR 63.1402(a)-(b)	Definitions	Yes, although no ongoing requirements for EU2.	N/A
40 CFR 63.1403	“Emission standards”		
40 CFR 63.1403(a)	Emission standards – provisions of this subpart, including the requirement of venting emissions as part of complying with 40 CFR Part 63, Subpart OOO through a closed vent system that meets the requirements of 40 CFR part 63, Subpart SS	Yes, ongoing requirements for EU2; 40 CFR part 63, Subpart SS requirements are summarized in Table 19.	AR2.5 and AR2.6
40 CFR 63.1403(b)	Combined emission streams	Yes, ongoing requirement for EU2; 40 CFR part 63. Paragraph (b)(1) applies, since EU2 includes one or more aggregate batch vent.	AR2.5 and M3
40 CFR 63.1403(b)(1)	Including one or aggregate batch vent streams	Yes, ongoing requirements for EU2	AR2.6 and M3

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1403(b)(2)(i)	“Reactor batch process vents and non-reactor batch process vents shall comply with the provisions for reactor batch process vents and non-reactor batch process vents, as appropriate”	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1403(b)(2)(ii)	“The remaining emissions (<i>i.e.</i> , storage vessel and/or continuous process vent emissions) included in the combined vent stream shall comply the provisions for storage vessels when storage vessel emissions are included and shall comply with the provisions for continuous process vents in the absence of storage vessel emissions (<i>i.e.</i> , when only continuous process vents are included).”	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1403(c)	Compliance for flexible operations process units	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1404	“Storage vessel provisions”		
40 CFR 63.1404(a)	Storage vessel provisions – emission standards	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1404(b)	Alternative standard	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1405	“Continuous process vent provisions”		
40 CFR 63.1405(a)	Continuous process vent provisions – emission standards	No and there are no ongoing requirements for EU2. Operation of the resin plant is a reactor batch process.	N/A
40 CFR 63.1405(b)	Alternative standard	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1406	“Reactor batch process vent provisions”		
40 CFR 63.1406(a)	“Emission Standards. Owners or operators of reactor batch process vents located at new or existing affected sources shall comply with paragraph (a)(1) or (2), as appropriate...”	Yes, ongoing requirements for EU2. Operation of the resin plant includes a reactor batch process with a single reactor kettle.	AR2.1
40 CFR 63.1406(a)(1)	“The owner or operator of a reactor batch process vent located at a new affected source shall control organic HAP emissions by complying with either paragraph 40 CFR 63.1406(a)(1)(i) or (ii)”	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1406(a)(1)(i)	“Vent all emissions of organic HAP to a flare.”	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1406(a)(1)(ii)	“Reduce organic HAP emissions for the batch cycle by 95 weight percent using a control device or control technology.”	Yes, ongoing requirements for EU2.	AR2.1
40 CFR 63.1406(a)(1)(iii)	“Reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0045 kilogram of organic HAP per megagram of product or less for solvent-based resin production, or to 0.0004 kilogram of organic HAP per megagram of product or less for non-solvent-based resin production.”	No and there are no ongoing requirements for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1406(a)(2)	“The owner or operator of a reactor batch process vent located at an existing affected source shall control organic HAP emissions by complying with either paragraph 40 CFR 63.1406(a)(2)(i), (ii), or (iii)”	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1406(b)	Alternative standard	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1406(c)	Use of boiler or process heater	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1407	“Non-reactor batch process vent provisions”		
40 CFR 63.1407(a)	Non-reactor batch process vent provisions – emission standards	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1407(b)	Alternative standard	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1407(b)(1)	Control device outlet concentration	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1407(b)(2)	Mass emission limit	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1408	“Aggregate batch vent stream provisions”		
40 CFR 63.1408(a)	“Emission standards. Owners or operators of aggregate batch vent streams at a new or existing affected source shall comply with either paragraph (a)(1) or (2), as appropriate...”	Yes, ongoing requirements for EU2. Combined vent stream from EU2 includes one or more aggregate batch vent stream.	AR2.1
40 CFR 63.1408(a)(1)(i)	“The owner or operator of an aggregate batch vent stream located at a new affected source shall vent all emissions of organic HAP to a flare.”	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1408(a)(1)(ii)	“The owner or operator of an aggregate batch vent stream located at a new affected source shall reduce organic HAP emissions by 95 weight percent or to a concentration of 20 ppmv when using a combustion control device or to a concentration of 50 ppmv when using a non-combustion control device, whichever is less stringent, on a continuous basis.”	Yes, ongoing requirements for EU2.	AR2.1
40 CFR 63.1408(a)(2)	Aggregate batch vent stream requirements located at an existing affected source.	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1408(b)	Alternative standard	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1409	“Heat exchange system provisions”		
40 CFR 63.1409(a)	“... owners and operators of sources subject to this subpart shall monitor each heat exchange system used to cool process equipment in an affected source, according to the provisions in either paragraph (b) or (c) of this section. Whenever a leak is detected, the owner or operator shall comply with the requirements in paragraph (d) of this section.”	No and there are no ongoing requirements for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1409(a)(1)	Operated with minimum pressure	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1409(a)(2)	“There is an intervening cooling fluid, containing less than 5 percent by weight of total HAP listed in column A of Table 2 of this subpart, between the process and the cooling water. This intervening fluid serves to isolate the cooling water from the process fluid, and the intervening fluid is not sent through a cooling tower or discharged. For purposes of this section, discharge does not include emptying for maintenance purposes.”	No and there are no ongoing requirements for EU2. The indirect condenser uses cooling fluid containing a mixture of water and ethylene glycol (not a target HAP).	N/A
40 CFR 63.1409(a)(3)-(6)	Other heat exchanger applicability	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1409(b)	Heat exchanger system monitoring	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1409(c)-(e)	Heat exchanger system leak provisions	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1410	“Equipment leak provisions”		
40 CFR 63.1410	“The owner or operator of each affected source shall comply with the requirements of 40 CFR Part 63, Subpart UU for all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more...”	Yes, ongoing requirements for EU2, summarized in Tables 19 and 20.	Applicable requirements integrated in AOP
40 CFR 63.1410(a)	Design evaluations	No and there are no ongoing requirements for EU2. The RTO is not a small control device.	N/A
40 CFR 63.1410(b)	Test Methods	Yes, ongoing requirements for EU2. Test methods presented in 40 CFR 63.1414 are integrated in AOP	M4 and M8
40 CFR 63.1410(c)	Option to measure TOC	Yes, although, there are no ongoing requirements for EU2.	N/A
40 CFR 63.1410(d)	Excused excursions are not allowed	Yes, although, there are no ongoing requirements for EU2.	N/A
40 CFR 63.1410(e)	Combined vent streams	Yes, ongoing requirements for EU2.	AR2.1
40 CFR 63.1410(f)	Scrubber requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1410(g)	Report due dates	Yes, although, there are no ongoing requirements for EU2.	N/A
40 CFR 63.1410(h)	Recordkeeping and reporting	Yes, although, there are no ongoing requirements for EU2.	N/A
40 CFR 63.1411	“Requirements for pressure relief devices”		
40 CFR 63.1411(a)	Pressure relief device operating limit	Yes, an ongoing requirement for EU2.	AR2.7
40 CFR 63.1411(b)	Pressure release requirements	Yes, ongoing requirements for EU2.	M19
40 CFR 63.1411(c)	Pressure release prohibition	Yes, ongoing requirements for EU2.	AR2.8 and M19
40 CFR 63.1411(c)(1)	Pressure release monitoring	Yes, ongoing requirements for EU2.	M19

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1411(c)(2)	Pressure release reporting	Yes, ongoing requirements for EU2.	RK16
40 CFR 63.1411(d)	Pressure relief devices routed to a control device	Yes, ongoing requirements for EU2.	AR2.2
40 CFR 63.1412	“Continuous process vent applicability assessment procedures and methods”		
40 CFR 63.1412(a)	Continuous process vent applicability assessment procedures and methods - general	No and there are no ongoing requirement for EU2. Operation of the resin plant is an aggregate batch process with a single batch reactor kettle.	N/A
40 CFR 63.1412(b)	Sampling sites	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(c)	Applicability assessment requirement	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(d)	Exceptions	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(e)	Organic HAP concentrations	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(f)	Volumetric flow rate	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(g)	Heating value	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(h)	Organic HAP emission rate	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(i)	Reserved	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(j)	TRE index value	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1412(k)	Engineering assessment	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413	“Compliance demonstration procedures”		
40 CFR 63.1413(a)	“ <i>General.</i> For each emission point, the owner or operator shall meet three stages of compliance, with exceptions specified in this subpart. First, the owner or operator shall conduct a performance test or design evaluation to demonstrate the performance of the control device or control technology being used. Second, the owner or operator shall meet the requirements for demonstrating initial compliance (<i>e.g.</i> , a demonstration that the required percent reduction is achieved). Third, the owner or operator shall meet the requirements for demonstrating continuous compliance through some form of monitoring (<i>e.g.</i> , continuous monitoring of operating parameters).”	Yes, ongoing requirements for EU2. Requirements in paragraphs (a) and (e) apply.	Applicable requirements integrated in AOP

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1413(a)(1)(i)	"Large control devices. Owners or operators are required to conduct a performance test for a large control device. The establishment of parameter monitoring levels shall be based on data obtained during the required performance test."	Yes, an ongoing requirement for the air pollution control device.	M3, M8 and M9
40 CFR 63.1413(a)(1)(ii)	Small Devices	No and there are no ongoing requirement for EU2. A large control device is used.	N/A
40 CFR 63.1413(a)(2)	Performance testing requirements	Yes, ongoing requirements for EU2 and the associated air pollution control and monitoring devices.	M8
40 CFR 63.1413(a)(2)(i)	Additional control devices not requiring performance testing	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413(a)(2)(ii)	Exceptions to performance test requirements in the 40 CFR Part 63, Subpart A	Yes, an ongoing requirement for EU2. Only paragraph A applies.	M8
40 CFR 63.1413(a)(3)	Design evaluations	Yes, an ongoing requirement for EU2. Only paragraph (v) applies to EU2.	M8
40 CFR 63.1413(a)(4)(i)(A)	Establishment of parameter monitoring levels – emissions points other than batch process vents	Yes, although, not an ongoing requirement for EU2. Triggered by 40 CFR 63.1413(a)(4)(i)(B). Temperature monitoring level has been established.	N/A
40 CFR 63.1413(a)(4)(i)(B)	Establishment of parameter monitoring levels – aggregate batch vent streams	Yes, although, not an ongoing requirement for EU2. Temperature monitoring level has been established.	N/A
40 CFR 63.1413(a)(4)(i)(C)	Establishment of parameter monitoring levels – batch process streams	Yes, although, not an ongoing requirement for EU2. Temperature monitoring level has been established.	N/A
40 CFR 64.1413(a)(4)(ii)	Establishment of parameter monitoring levels based on performance tests, engineering assessments, and/or manufacturer's recommendations.	Yes, although, not an ongoing requirement for EU2. Temperature monitoring level has been established.	N/A
40 CFR 63.1413(b)	Initial and continuous compliance for storage vessels	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413(c)	Initial and continuous compliance for continuous process vents	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413(d)	Initial and continuous compliance for aggregate batch vent streams	Yes, ongoing requirements for EU2. Initial compliance has been established. Continuous compliance with the percent reduction standard specified in 40 CFR 63.1405(a)(2) shall be demonstrated following the procedures in 40 CFR Part 63, Subpart SS.	See Table 19
40 CFR 63.1413(e)(1)	Initial and continuous compliance for batch process streams – compliance with percent reduction standards	Yes, ongoing requirements for EU2.	AR2.1, AR2.6, and M3

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1413(e)(1)(i)	Batch process design evaluation	Yes, an ongoing requirement for EU2.	M3
40 CFR 63.1413(e)(1)(ii)	Batch process performance test requirements	Yes, an ongoing requirement for EU2.	M3, M7 and M8
40 CFR 63.1413(e)(1)(iii)	Batch process performance test recordkeeping	Yes, an ongoing requirement for EU2.	RK9 and RK20
40 CFR 63.1413(e)(1)(iv)	Batch process initial compliance with percent reduction standards	Yes, although not an ongoing requirement for EU2. Initial compliance has been established.	N/A
40 CFR 63.1413(e)(1)(v)	Batch process continuous compliance with percent reduction standards	Yes, an ongoing requirement for EU2.	M3 and M9
40 CFR 63.1413(e)(2)-(4)	Other batch process compliance requirements	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413(f)	Compliance with alternative standard	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413(g)	Flare compliance demonstrations	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413(h)	Continuous process vent compliance at existing sources	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1413(i)	Deviations	Yes, ongoing requirements for EU2. Applicable deviations will be recorded and reported when required.	Applicable requirements integrated in AOP
40 CFR 63.1414	“Test methods and emissions estimation equations”		
40 CFR 63.1414(a)	Test methods	Yes, ongoing requirements for EU2.	M3 and M8
40 CFR 63.1414(b)	Batch process vent performance testing procedures	Yes, ongoing requirements for EU2.	M3 and M8
40 CFR 63.1414(c)	Percent oxygen correction for combustion control devices	Yes, ongoing requirements for EU2.	M3 and M8
40 CFR 63.1414(d)	Uncontrolled organic HAP emissions	Yes, ongoing requirements for EU2. Paragraph (d)(6) applies. Calculations assume the use of material balances.	M3, M7, and M8
40 CFR 63.1415	“Monitoring requirements”		
40 CFR 63.1415(a)	Monitoring requirements – general	Yes, ongoing requirements for the RTO and EU2.	M3 and M9
40 CFR 63.1415(b)	Monitoring equipment	Yes, ongoing requirements for RTO and EU2. Only paragraph (5)(i) applies.	M3 and M9
40 CFR 63.1415(c)	Alternative monitoring parameters	Yes, although, not an ongoing requirement for EU2.	N/A
40 CFR 63.1415(d)	Monitoring of bypass lines	Yes, ongoing requirements for EU2.	M3 and M5
40 CFR 63.1415(e)	Monitoring for the alternative standards	Yes, although, no ongoing requirements for EU2.	N/A
40 CFR 63.1416	“Recordkeeping requirements”		
40 CFR 63.1416(a)	Recordkeeping requirements – data retention	Yes, ongoing requirements for EU2.	RK9
40 CFR 63.1416(b)	Malfunction records	Yes, ongoing requirements for EU2.	RK23

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1416(c)	Monitoring records	Yes, ongoing requirements for EU2.	RK17 and RK18
40 CFR 63.1416(c)(1)	Measured data retention	Yes, ongoing requirements for EU2.	RK17 and RK18
40 CFR 63.1416(c)(2)	Measured data requirements	Yes, ongoing requirements for EU2.	RK17 and RK18
40 CFR 63.1416(c)(2)(i)	Daily average value	Yes, ongoing requirements for EU2.	RK17 and RK18
40 CFR 63.1416(c)(2)(ii)	Operating day and block averages	Yes, ongoing requirements for EU2.	RK17 and RK18
40 CFR 63.1416(c)(3)	Reduced recordkeeping	Yes, ongoing requirements for EU2.	RK17 and RK18
40 CFR 63.1416(c)(4)	Data exclusions	Yes, ongoing requirements for EU2.	RK17 and RK18
40 CFR 63.1416(c)(5)	Monitoring different parameters	Yes, although, not an ongoing requirement for EU2.	N/A
40 CFR 63.1416(c)(6)	Alternative continuous monitoring and recordkeeping provisions	Yes, although, not an ongoing requirement for EU2.	N/A
40 CFR 63.1416(d)(1)	Batch process vent records – readily available records	Yes, ongoing requirements for EU2. Only paragraphs (i) and (ii) apply.	RK9
40 CFR 63.1416(d)(2)	Establishment of parameter monitoring level records	Yes, although, not an ongoing requirement for EU2.	N/A
40 CFR 63.1416(d)(3)(i)(A)	Continuous records of parametric data	Yes, ongoing requirement for EU2.	RK17 and RK18
40 CFR 63.1416(d)(3)(ii)	Bypass line and monitoring records	Yes, ongoing requirement for EU2. Only paragraph (B) and (C) applies.	RK17 and RK19
40 CFR 63.1416(d)(3)(iii)	Compliance with alternative standard records	Yes, although, no ongoing requirements for EU2.	N/A
40 CFR 63.1416(e)(1)(i)	Aggregate batch vent stream records	Yes, ongoing requirement for EU2.	See Table 19
40 CFR 63.1416(e)(2)	Establishment of parameter monitoring level records	Yes, although, not an ongoing requirement for EU2.	N/A
40 CFR 63.1416(e)(3)(i)(A)	Continuous records of parametric data	Yes, ongoing requirement for EU2.	RK17 and RK18
40 CFR 63.1416(e)(3)(ii)	Bypass line and monitoring records	Yes, ongoing requirement for EU2. Only paragraph (B) and (C) applies.	RK17 and RK19
40 CFR 63.1416(e)(3)(iii)	Compliance with alternative standard records	Yes, although, no ongoing requirements for EU2.	N/A
40 CFR 63.1416(f)	Continuous process vent records	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1416(g)(1)	Other monitoring records	Yes, ongoing requirements for EU2.	RK17
40 CFR 63.1416(g)(2)	Waiver of recordkeeping or reporting requirements	Yes, ongoing requirements for EU2.	G17
40 CFR 63.1416(g)(3)	Exemption from equipment leak provisions	Yes, although, not an ongoing requirement for EU2.	N/A
40 CFR 63.1416(g)(4)	Heat exchange system records	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1416(g)(5)	Pressure relief device records	Yes, ongoing requirements for EU2.	RK15
40 CFR 63.1416(h)	Reduced recordkeeping program	Yes, ongoing requirements for EU2.	RK18

Continued – Section 6. Applicability of Federal Standards

Continued – Table 21: 40 CFR Part 63 Subpart OOO Applicability to EU2

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.1417	“Reporting requirements”		
40 CFR 63.1417(a)	Reporting and notification	Yes, ongoing requirements for EU2.	RP5 and RP6
40 CFR 63.1417(b)	General reporting requirements	Yes, ongoing requirements for EU2.	RP5 and RP6
40 CFR 63.1417(c)	Submittals	Yes, ongoing requirements for EU2.	RP5 and RP6
40 CFR 63.1417(d)	Precompliance report	Yes, ongoing requirements for EU2.	RP5
40 CFR 63.1417(e)	Notification of compliance status	Yes, ongoing requirements for EU2.	RP6
40 CFR 63.1417(f)	Periodic reports	Yes, ongoing requirements for EU2.	RP5 and RP11
40 CFR 63.1417(g)	Reports of malfunctions	Yes, ongoing requirement for EU2.	RP11
40 CFR 63.1417(h)(1)	Other reports – storage vessels	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1417(h)(2)	Site-specific test plan	Yes, ongoing requirement for EU2.	RP17
40 CFR 63.1417(h)(3)	Performance test notification	Yes, ongoing requirement for EU2.	RP17
40 CFR 63.1417(h)(4)	Changes to the primary product for an APPU or EU2	Yes, ongoing requirement for EU2.	RP16
40 CFR 63.1417(h)(5)	APPU reporting	Yes, ongoing requirement for EU2.	RP16
40 CFR 63.1417(h)(6)	Small control device records	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1417(h)(7)	Continuous vent records	No and there are no ongoing requirements for EU2.	N/A
40 CFR 63.1417(h)(8)	Electronic reporting	Yes, ongoing requirement for EU2	RP14
40 CFR 63.1417(i)	Operating permit application	Yes, although, no ongoing requirement for EU2.	N/A
40 CFR 63.1417(j)	Alternative monitoring parameters	Yes, although, no ongoing requirement for EU2.	N/A
40 CFR 63.1417(k)	Alternative continuous monitoring	Yes, although, no ongoing requirement for EU2.	N/A
40 CFR 63.1419	Implementation and enforcement	Yes, although, no ongoing requirement for EU2.	N/A

Continued – Section 6. Applicability of Federal Standards

Organic Chemical Manufacturing MACT – Title 40 CFR Part 63, Subpart FFFF

Effective since November 10, 2003, the requirements of the Organic Chemical Manufacturing MACT apply to operations involving miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of hazardous air pollutants. A MCPU includes equipment defined in 40 CFR 63.2435(b) that produces materials or families of materials that are described in paragraphs (b)(1)(i), (ii), (iii), (iv), or (v) of 40 CFR 63.2435.

Inapplicable: *Paneltech's facility includes a batch reactor that produces organic chemicals classified under the 1987 version of SIC code 282 and is a major source of hazardous air pollutants. Affiliated operations located at an affected source under the Paper Coating MACT are exempted; therefore, the Organic Chemical Manufacturing MACT requirements do not apply to Paneltech.*

Paper Coating MACT – Title 40 CFR Part 63, Subpart JJJJ

Effective since December 4, 2002, the requirements of the Paper Coating MACT apply to paper and other web coating operations that are located at a facility that is a major source as defined is a major source of hazardous air pollutants as defined in Title 40 CFR Part 63, Subpart A. The Paper Coating MACT establishes standards for web coating lines engaged in the coating of metal webs that are used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape and abrasive materials.

Only those requirements from Subpart JJJJJ that apply to Paneltech on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Paneltech from the requirements if they are triggered by some future action. Table 22 below lists all requirements from 40 CFR Part 63, Subpart JJJJJ that apply to EU-1, and shows the corresponding AOP condition incorporating each requirement.

Applicable: *Paneltech is a major source of hazardous air pollutants where paper is coated with phenolic surface films in a web coating line; therefore, the Paper Coating MACT requirements do apply to EU1 and EU3. A web coating line means any number of work stations, of which one or more applies a continuous layer of coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind or feed station and a rewind or cutting station. Work station means a unit on a web coating line where coating material is deposited onto a web substrate. Rewind or cutting station means a unit from which substrate is collected at the outlet of a web coating line. Unwind or feed station means a unit from which substrate is fed to a web coating line. All applicable Paper Coating MACT requirements have been integrated into AOP and are summarized in Table 22.*

Continued – Section 6. Applicability of Federal Standards

Table 22: 40 CFR Part 63 Subpart JJJJ Applicability to EU1 and EU3

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.3280	“What is in this subpart?”	Yes, although not an ongoing requirement for EU1 and EU3.	N/A
40 CFR 63.3290	“Does this subpart apply to me?”	Yes, although not an ongoing requirement. EU1 and EU3 is a web coating line and Paneltech is a major source of methanol.	N/A
40 CFR 63.3300	“Which of my emission sources are affected by this subpart?”	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3300(a)	Subpart KK web coating line	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3300(b)	Packaging rotogravure or wide-web flexographic press under Subpart KK	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3300(c)	Web coating in lithography, screen-printing, letterpress, and narrow-web flexographic printing processes.	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3300(d)	Subpart EE web coating	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3300(e)	Surface coating of metal coil	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3300(f)	Textile and fabric web coating	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3300(g)	Research or laboratory web coating	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3310	“What definitions are used in this subpart?”	Yes, although, no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3320	“What emissions standards must I meet?”	Yes, ongoing requirements for EU1 and EU3.	AR1.1 and AR3.1
40 CFR 63.3320(a)	“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 40 CFR 63.3330.”	Yes, ongoing requirements for EU1 and EU3.	AR1.1 and AR3.1
40 CFR 63.3320(b)	“You must limit organic HAP emissions to the level specified in paragraph (b)(1), (2), (3), or (4) of this section”	Yes, ongoing requirements for EU1 and EU3. Only paragraph (1) applies.	AR1.1 and AR3.1
40 CFR 63.3320(b)(1)	“No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources, and no more than 2 percent of the organic HAP applied for each month (98 percent reduction) at new affected sources”	Yes, ongoing requirements for EU1 and EU3. Applies to the RTO with destruction efficiency of 98.5 percent.	AR1.1 and AR3.1
40 CFR 63.3320(c)	“You must demonstrate compliance with this subpart by following the procedures in 40 CFR 63.3370”	Yes, ongoing requirements for EU1 and EU3.	AR1.1, AR3.1, and M2

Continued – Section 6. Applicability of Federal Standards

Continued – Table 22: 40 CFR Part 63 Subpart JJJJ applicability to EU1 and EU3

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.3321	“What operating limits must I meet?”		
40 CFR 63.3321(a)	“For any web coating line or group of web coating lines for which you use add-on control devices, unless you use a solvent recovery system and conduct a liquid-liquid material balance, you must meet the operating limits specified in Table 1 to 40 CFR part 63, Subpart JJJJ or according to paragraph (b) of this section. These operating limits apply to emission capture systems and control devices, and you must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3360(e)(3). You must meet the operating limits at all times after you establish them”	Yes, ongoing requirements for EU1 and EU3.	AR1.3, AR3.3, M2, M7, M8, M9, M10, and M11
40 CFR 63.3321(b)	Other add-on control devices	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.330	“When must I comply?”		
40 CFR 63.3330(a)	“If you own or operate an existing affected source subject to the provisions of this subpart, you must comply by the compliance date. The compliance date for existing affected sources in this subpart is December 5, 2005. You must complete any performance test required in 40 CFR 63.3360 within the time limits specified in 40 CFR 63.7(a)(2)”	Yes, although, no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3330(b)	New affected source compliance dates	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3330(c)	Reconstructed affected source compliance dates	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3340	“What general requirements must I meet to comply with the standards?”		
40 CFR 63.3340	General requirements for compliance with the standards	Yes, ongoing requirements for EU1 and EU3.	See Table 18
40 CFR 63.3350	“If I use a control device to comply with the emission standards, what monitoring must I do?”		
40 CFR 63.3350(a)(1)	Intermittently-controlled work stations	No and there are no ongoing requirements for EU1 and EU3. The dryer exhaust will only be sued a safety relief valve.	N/A
40 CFR 63.3350(a)(2)	Solvent recovery unit	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3350(a)(3)	Control device	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(a)(4)	Capture system	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(b)	Continued compliance demonstration requirements and monitoring equipment installation requirements	Yes, ongoing requirements for EU1 and EU3.	M2 and M9

Continued – Section 6. Applicability of Federal Standards

Continued – Table 22: 40 CFR Part 63 Subpart JJJJ applicability to EU1 and EU3

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.3350(c)	Bypass and coating use monitoring	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3350(d)	Solvent recovery unit	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3350(e)	Continuous parameter monitoring system (CPMS) and RTO requirements	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(1)	CPMS operation	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(2)	Valid data 90 percent minimum	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(3)	Data availability requirements	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(4)	3-hour average requirement	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(5)	CPMS recordkeeping	Yes, ongoing requirements for EU1 and EU3.	RK17 and RK18
40 CFR 63.3350(e)(6)	CPMS proper working order	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(7)	Invalid data	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(8)	Missing monitoring data	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(9)	Oxidizer requirements	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3350(e)(10)	Other types of control devices	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3350(f)	Capture system monitoring requirements	Yes, ongoing requirements for EU1 and EU3.	M2, M10, and M11
40 CFR 63.3360	“What performance tests must I conduct?”		
40 CFR 63.3360(a)(1)	Limiting organic HAP or volatile matter content of coatings performance testing	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3360(a)(2)	“Conduct a performance test for each capture and control system to determine: the destruction or removal efficiency of each control device other than solvent recovery according to 40 CFR 63.3360(e)”	Yes, ongoing requirements for EU1 and EU3.	M2 and M8
40 CFR 63.3360(b)	Performance testing exemptions	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3360(c)	Organic HAP content	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3360(d)	Volatile organic and coating solids content	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3360(e)	Control device efficiency	Yes, ongoing requirements for EU1 and EU3.	M2 and M8
40 CFR 63.3360(e)(1)	Testing methods	Yes, ongoing requirements for EU1 and EU3.	M2 and M8

Continued – Section 6. Applicability of Federal Standards

Continued – Table 22: 40 CFR Part 63 Subpart JJJJ applicability to EU1 and EU3

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.3360(e)(2)	Testing recordkeeping	Yes, ongoing requirements for EU1 and EU3.	RK20
40 CFR 63.3360(e)(3)	Operating limits	Yes, although, no ongoing requirements for EU1 and EU3. Operating limits already established.	N/A
40 CFR 63.3360(f)	Capture efficiency	Yes, ongoing requirements for EU1 and EU3.	M2 and M10
40 CFR 63.3360(g)	Volatile matter retained in the coated web or otherwise not emitted to the atmosphere	Yes, ongoing requirements for EU1 and EU3	M7
40 CFR 63.3360(h)	Control devices in series	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370	“How do I demonstrate compliance with the emission standards?”		
40 CFR 63.3370(a)(1)	Use of “as-purchased” compliant coating materials	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(a)(2)	Use of “as-applied” compliant coating materials	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(a)(3)	Tracking total monthly organic HAP applied	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(a)(4)	Use of a capture system and control device - Follow the procedures set out in 40 CFR 63.3370(e) to determine compliance with 40 CFR 63.3320(b)(1) according to 40 CFR 63.3370(i) if using a solvent recovery device, or 40 CFR 63.3370(j) if using a control device and CPMS, or 40 CFR 63.3370(k) if using an oxidizer.	Yes, ongoing requirements for EU1 and EU3. Only paragraph (i) applies, triggering requirement to comply with 40 CFR 63.3370(j).	M2, M7, M8, M9, M10, and M11
40 CFR 63.3370(a)(5)	Use of multiple capture and/or control devices - Follow the procedures set out in 40 CFR 63.3370(e) to determine compliance with 40 CFR 63.3320(b)(1) according to 40 CFR 63.3370(e)(1) or (2).	Yes, ongoing requirements for EU1 and EU3. Only paragraph (i) applies.	M2, M7, M8, M9, M10, and M11
40 CFR 63.3370(a)(6)	Use of a combination of compliant coatings and control devices	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(b)	As purchased “compliant” coating materials	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(c)	As-applied “compliant” coating materials	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(d)	Monthly allowable organic HAP applied	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(e)	Capture and control reduce emissions to no more than the allowable limit	Yes, ongoing requirements for EU1 and EU3.	M2, M9, M10, and M11
40 CFR 63.3370(e)(1)	Always-controlled work station	Yes, ongoing requirements for EU1 and EU3.	M2, M9, M10, and M11
40 CFR 63.3370(e)(2)	Never-controlled or intermittently-controlled work stations	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(e)(3)	Alternative method	No and there are no ongoing requirements for EU1 and EU3.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 22: 40 CFR Part 63 Subpart JJJJ applicability to EU1 and EU3

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.3370(f)	Capture and control to achieve mass fraction of coating solids applied limit	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(g)	Capture and control to achieve mass fraction limit	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(h)	Capture and control to achieve allowable emission rate	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(i)	Solvent recovery device compliance demonstration	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(j)	Capture and control system compliance demonstration procedures using a CPMS	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(k)	Oxidizer compliance demonstration procedures	Yes, ongoing requirements for EU1 and EU3.	M2
40 CFR 63.3370(k)(1)(i)	Oxidizer destruction efficiency	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3370(k)(1)(ii)	Capture system capture efficiency	Yes, ongoing requirements for EU1 and EU3.	M2 and M10
40 CFR 63.3370(k)(1)(iii)	Capture and control efficiency monitoring	Yes, ongoing requirements for EU1 and EU3.	M2 and M9
40 CFR 63.3370(k)(1)(iv)	Determining mass of each coating material applied	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(k)(1)(v)	Determining organic HAP content of each coating material as-applied	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(k)(1)(vi)	Determining the coating solids content of each coating material applied	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(k)(2)(i)	Control efficiency	Yes, ongoing requirements for EU1 and EU3.	M2, M7, and M8
40 CFR 63.3370(k)(2)(ii)	Organic HAP emitted	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(k)(2)(iii)	Organic emission rate based on coating solids applied	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(k)(2)(iv)	Organic HAP based on coating materials applied	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(k)(3)	Compliance demonstration	Yes, ongoing requirements for EU1 and EU3.	M2
40 CFR 63.3370(l)	Monthly allowable organic HAP emissions	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(m)	Reserved	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(n)	Combinations of capture and control	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(o)	Intermittently-controlled and never-controlled work stations	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3370(p)	Always-controlled work stations with more than one capture and control system	Yes, ongoing requirements for EU1 and EU3.	M2

Continued – Section 6. Applicability of Federal Standards

Continued – Table 22: 40 CFR Part 63 Subpart JJJJ applicability to EU1 and EU3

CITATION	SUBJECT	APPLICABLE	AOP CONDITION
40 CFR 63.3400	“What notifications and reports must I submit?”		
40 CFR 63.3400(a)	Reporting requirements	Yes, ongoing requirements for EU1 and EU3.	RP5 and RP6
40 CFR 63.3400(b)	Initial notification	Yes, although, there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3400(c)	Semiannual compliance report	Yes, ongoing requirements for EU1 and EU3.	RP11
40 CFR 63.3400(d)	Notification of performance testing	Yes, ongoing requirements for EU1 and EU3.	RP17
40 CFR 63.3400(e)	Notification of compliance status	Yes, ongoing requirements for EU1 and EU3.	RP6
40 CFR 63.3400(f)	Performance test reporting	Yes, ongoing requirements for EU1 and EU3.	RP11
40 CFR 63.3400(g)	SSMP reports	Yes, ongoing requirements for EU1 and EU3.	RP5, RP11, and RP13
40 CFR 63.3410	“What records must I keep?”		
40 CFR 63.3410(a)(1)	CPMS data recordkeeping	Yes, ongoing requirements for EU1 and EU3.	RK17 and RK18
40 CFR 63.3410(a)(2)	CPMS recordkeeping	Yes, ongoing requirements for EU1 and EU3.	RK17 and RK18
40 CFR 63.3410(b)	Liquid-liquid material balances recordkeeping	No and there are no ongoing requirements for EU1 and EU3.	N/A
40 CFR 63.3420	“What authorities may be delegated to the States”	Yes, although there are no ongoing requirements for EU1 and EU3.	N/A

Continued – Section 6. Applicability of Federal Standards

Industrial Boiler MACT – Title 40 CFR Part 63, Subpart DDDDD

Effective since September 13, 2004, the requirements of the Industrial Boiler MACT apply to industrial, commercial, and institutional boilers and process heaters that are located, or a part of, a major source of hazardous air pollutants as defined in Title 40 CFR Part 63 Subpart A.

Only those requirements from Subpart DDDDD that apply to Paneltech on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Paneltech from the requirements if they are triggered by some future action. Table 23 below lists all requirements from 40 CFR Part 63, Subpart DDDDD that apply to EU-4, and shows the corresponding AOP condition incorporating each requirement.

Applicable: *Paneltech’s facility operates a natural gas fired boiler that provides steam for their resin plant. EU-4 is classified as a small gaseous fuel fired equipment; therefore, the boiler is subject to limited requirements. Per 40 CFR 63.7506(b)(3), the units are not subject to any emission limits, work practice standards, performance testing, monitoring, SSM (startup, shutdown, and malfunction) plans, site-specific monitoring plans, recordkeeping, and reporting requirements of this subpart. All applicable Industrial Boiler MACT requirements have been integrated into the AOP and are summarized in Table 23.*

Table 23: 40 CFR Part 63 Subpart DDDDD Applicability to EU-4

CITATION	SUBJECT	APPLICABLE	CONDITION
40 CFR 63.7480	What is the purpose of this subpart?	Yes, although, no ongoing requirement for EU4.	N/A
40 CFR 63.7485	Am I subject to this subpart?	Yes, although, no ongoing requirement for EU4. EU4 consists of an industrial boiler as defined in 40 CFR 63.7575.	N/A
40 CFR 63.7490.	What is the affected source of this subpart?	Yes, paragraphs (a)(1) and (d) apply, although, no ongoing requirement for EU4.	N/A
40 CFR 63.7491	Are any boilers or process heaters not subject to this subpart?	Yes, although, no ongoing requirements for EU4. The process heaters that provide heat to EU1 for curing purposes and the process heater that provides heated oil to EU3 area exempt from 40 CFR Part 63, Subpart DDDDD since they are specifically listed as part of the web coating line in 40 CFR Part 63, Subpart JJJJ.	N/A
40 CFR 63.7495	When do I have to comply with this subpart	Yes, although no ongoing requirements. Paragraphs (b) and (d) apply to EU4. Paneltech, LLC submitted an extension under 40 CFR 63.6(i) to extend compliance of EU4 to August 01, 2016. ORCAA granted the extension.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 23: 40 CFR Part 63 Subpart DDDDD Applicability to EU-4

CITATION	SUBJECT	APPLICABLE	CONDITION
40 CFR 63.7499	What are the subcategories of boilers and process heaters?	Yes, although no ongoing requirements for EU4. Paragraph (l) applies to EU4, although, no ongoing requirement for EU4.	N/A
40 CFR 63.7500	What emission limits, work practice requirements for complying with this subpart?	Yes, no ongoing requirements. Only paragraphs (a)(1), (a)(3), and (b) apply to the units in EU4.	AR4.0, AR4.1, and AR4.3
40 CFR 63.7505	What are my general requirements for complying with this subpart?	Yes, although no ongoing requirements for EU4. Only paragraph (a) applies.	N/A
40 CFR 63.7510	What are my initial compliance requirements and by what date must I conduct them?	No and there are no ongoing requirements for EU4.	N/A
40 CFR 63.7515	When must I conduct subsequent performance tests or fuel analyses?	Yes, ongoing requirements for EU4. Only paragraph (d) applies to each unit EU4.	AR4.0
40 CFR 63.7520	What performance test and procedures must I use?	No and there are no ongoing performance test requirements for EU4.	N/A
40 CFR 63.7521	What fuel analyses and procedures must I use?	No and there are no ongoing fuel analysis requirements for EU4.	N/A
40 CFR 63.7522	Can I use emission averaging to comply with this subpart?	No, there are no ongoing emission averaging requirements for EU4.	N/A
40 CFR 63.7525	What are my monitoring, installation, operation, and maintenance requirements?	No and there are no ongoing requirements for EU4.	N/A
40 CFR 63.7530	How do I demonstrate initial compliance with the emission limits and work practice requirements?	Yes, ongoing requirements for EU4. Only paragraph (e) and (h) apply.	AR4.1
40 CFR 63.7533	Can I use efficiency credits earned from implementation of energy conservation measures to comply with this subpart?	No and there are no ongoing requirements for EU4.	N/A
40 CFR 63.7535	Is there a minimum amount of monitoring data I must obtain?	No and there are no ongoing requirements for EU4.	N/A
40 CFR 63.7540	How do I demonstrate continuous compliance with the emission limits and work practice standards?	Yes, ongoing requirements for EU4. Only paragraphs (a)(10) and (12) apply.	AR4.0 and M21
40 CFR 63.7541	How do I demonstrate continuous compliance under the emission averaging provision?	No and there are no ongoing requirements for EU4.	N/A
40 CFR 63.7545(a)	Notification provisions	Yes, ongoing requirements for EU4.	RP6
40 CFR 63.7545(b)	Initial notification for existing affected sources	No and there are no ongoing requirements for EU4.	N/A
40 CFR 63.7545(c)	Initial notification for new and reconstructed sources	No and there are no ongoing requirements for EU4. EU4 is an existing affected source	N/A
40 CFR 63.7545(d)	Notification of intent	No and there are no ongoing requirements for EU4. Performance testing is not required for EU4.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 23: 40 CFR Part 63 Subpart DDDDD Applicability to EU-4

CITATION	SUBJECT	APPLICABLE	CONDITION
40 CFR 63.7545(e)	Initial compliance notification	Yes, ongoing requirements for EU4.	RP20
40 CFR 63.7545(f)	Notifications if fuel other than gas is used	No and there are no ongoing requirements for EU4.	N/A
40 CFR 63.7550	What reports must I submit and when?	Yes, ongoing requirements for EU4. Only paragraphs (a), (b), (c)(1), and (c)(5)(xiv)	RP11
40 CFR 63.7555	What records must I keep?	Yes, ongoing requirements for EU4. Only paragraph (a)(1) applies.	RK9 and RK16
40 CFR 63.7560	In what form and how long must I keep my records?	Yes, ongoing requirements for EU4.	RK9
40 CFR 63.7565	What parts of the general provisions apply to me?	Yes, ongoing requirements for EU4.	See Table 18
40 CFR 63.7570	Who implements and enforces this subpart?	Yes, although, no ongoing requirements for EU4.	N/A
40 CFR 63.7575	What definitions apply to this subpart?	Yes, although, no ongoing requirements for EU4.	N/A

Compliance Assurance Monitoring (CAM) – Title 40 CFR Part 64

Under 40 CFR Part 64.2(a) a facility is subject to the CAM Rule if it contains at least one emissions unit that is subject to an emissions limitation or standard that is not based on a federal standard promulgated after 1990, uses a control device to meet this limitation or standard, and has potential pre-control device emissions sufficient to be classified as a major source.

Only those requirements from Part 64 that apply to Paneltech on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Paneltech from the requirements if they are triggered by some future action. Table 24 below lists all requirements from 40 CFR Part 64 that apply to EU-1, and shows the corresponding AOP condition incorporating each requirement.

Applicable: *The paper coating line considered collectively as EU1, is subject to an emissions limitations under Order of Approval (#06MOD517), meets the limitations through use of an RTO, and is a major source of methanol. Therefore, the CAM Rule applies to methanol emissions from EU-1. A CAM plan has been submitted previously and has been integrated into the AOP. All applicable CAM requirements have been integrated into the AOP and are summarized in Table 24.*

Continued – Section 6. Applicability of Federal Standards

Table 24: 40 CFR Part 64 Applicability to EU-1

CITATION	SUBJECT	APPLICABLE	CONDITION
40 CFR 64.1	Definitions	Yes, although, no ongoing requirements for EU1.	N/A
40 CFR 64.2(a)	General applicability	Yes, although, no ongoing requirements for EU1.	N/A
40 CFR 64.2(b)	Exemptions	No and there are no ongoing requirements for EU1.	N/A
40 CFR 64.3	“Monitoring design criteria”		
40 CFR 64.3(a)	General criteria	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(a)(1)	Designing indicators for monitoring	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(a)(2)	Establishing an appropriate range(s) or designated condition(s) for the selected indicator(s)	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(a)(3)	Designing indicator ranges	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(b)(1)	Performance criteria specifications	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(b)(2)	Confirming operational status	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(b)(3)	Quality assurance and control practices	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(b)(4)	Frequency of conducting the monitoring	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(c)	Evaluation factors	Yes, ongoing requirements for EU1.	M9
40 CFR 64.3(d)	Special criteria for the use of continuous emission, opacity or predictive monitoring systems.	No and there are no ongoing requirements for EU1.	N/A
40 CFR 64.4	“Submittal requirements”		
40 CFR 64.4(a)	Design requirement submittals	Yes, ongoing requirements for EU1. Only paragraph (3) applies on an ongoing basis.	RP18
40 CFR 64.4(b)	Justification for the proposed elements of the monitoring	Yes, although, no ongoing requirements for EU1. Required monitoring has been established.	N/A
40 CFR 64.4(c)	Performance testing requirements	Yes, ongoing requirements for EU1.	M8, M9, and RP18
40 CFR 64.4(e)	Monitoring installation requirements	No and there are no ongoing requirements for EU1.	N/A
40 CFR 64.4(f)	Common control device reporting	Yes, ongoing requirements for EU1.	M9,
40 CFR 64.4(g)	More than one control device reporting	No and there are no ongoing requirements for EU1.	N/A
40 CFR 64.5	Deadlines for submittals	Yes, although, no ongoing requirements for EU1.	N/A
40 CFR 64.6	Approval for monitoring	Yes, although, no ongoing requirements for EU1. Required monitoring has been established.	N/A

Continued – Section 6. Applicability of Federal Standards

Continued – Table 24: 40 CFR 64 Applicability to EU-1

CITATION	SUBJECT	APPLICABLE	CONDITION
40 CFR 64.7	“Operation of approved monitoring”		
40 CFR 64.7(a)	Commencement of operation	Yes, although, no ongoing requirements for EU1.	N/A
40 CFR 64.7(b)	Proper maintenance	Yes, ongoing requirements for EU1.	M9
40 CFR 64.7(c)	Continued operation	Yes, ongoing requirements for EU1.	FW18 and AR1.10
40 CFR 64.7(d)	Response to excursions and exceedances	Yes, ongoing requirements for EU1.	AR1.7
40 CFR 64.7(e)	Documentation of need for improved monitoring	Yes, ongoing requirements for EU1.	RP12
40 CFR 64.8	Quality improvement plan requirements	Yes, ongoing requirements for EU1.	AR1.11
40 CFR 64.9	“Reporting and recordkeeping requirements”		
40 CFR 64.9(a)	General reporting requirements	Yes, ongoing requirements for EU1.	RP11
40 CFR 64.9(b)	General recordkeeping requirements	Yes, ongoing requirements for EU1.	RK9 and RK21
40 CFR 64.10	Saving provisions	Yes, although, no ongoing requirements for EU1.	N/A

Continued – Section 6. Applicability of Federal Standards

Greenhouse Gas (GHG) Reporting Rule

On October 30, 2009, and as amended on July 12, 2010, September 22, 2010, November 30, 2010, December 1, 2010, December 17, 2010, December 27, 2010, and March 18, 2011, EPA promulgated regulations for mandatory federal GHG reporting in 40 CFR Part 98. In general, the regulations require that facilities that emit 25,000 metric tons of CO₂e must report their GHG emissions to EPA.

The federal GHG reporting requirements given in 40 CFR Part 98 are not considered “applicable requirements,” as defined in 40 CFR 70.2, under the title V operating permit program. Therefore, inclusion of the federal GHG reporting requirements in 40 CFR Part 98 is not required for the Title V permit.

“Tailoring Rule”

On May 13, 2010, EPA issued a final rule that “tailors” the applicability criteria given in 40 CFR Parts 51, 52, 70, and 71 that determine which stationary sources and modification projects become subject to permitting requirements for GHG emissions under the PSD and Title V programs of the Clean Air Act. Per the 2010 version of the tailoring rule, on and after July 1, 2011, any existing or new source with the potential to emit more than 100,000 tpy CO₂e needed a Title V permit. Additionally, for PSD, permitting requirements were triggered if the project was expected to increase GHG emissions by more than 75,000 tpy CO₂e.

On June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA* (No. 12-1146). The Court said that EPA may not treat greenhouse gases as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also said that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on greenhouse gases emissions based on the application of Best Available Control Technology (BACT).

On April 30, 2015, in response to the court decision, EPA issued a direct final rule to narrowly amend the permit rescission provisions in the PSD regulations. This action allows the rescission of Clean Air Act PSD permits that issued by the EPA or delegated state and local permitting authorities on the sole basis of a source’s GHG emissions.

The Washington Department of Ecology adopted the 2010 tailoring rule changes on the state level by revising Chapter 173-400 WAC (filed on 3/1/11), and has not updated their rule to address the recent EPA rule changes. Therefore, the Ecology rule, which contains the original 100,000 tpy CO₂e threshold for Title V, is still applicable.

As part of the AOP renewal application, Paneltech submitted information on their maximum GHG PTE from their facility. Based on PTE emission estimates given above, Paneltech is not considered major for GHG under the tailoring rules.

Continued – Section 6. Applicability of Federal Standards

Risk Management Program Requirements

Under 40 CFR Part 68 pursuant to Section 112(r) of the Federal Clean Air Act, requirements call for risk management plans at facilities that use hazardous substances. The requirements under 40 CFR Part 68 apply to facilities that use or store materials in quantities that might pose an immediate danger to human health or safety if there is an accidental release.

Based on Paneltech's AOP application, Paneltech's facility does not maintain significant quantities or use any of the regulated substances listed in Section 112(r) of the Federal Clean Air Act. Therefore the facility is not required to comply with any of the requirements of this Section.

Prevention of Signification Deterioration (PSD)

In areas that currently meet the National Ambient Air Quality Standards, new major sources and major modifications (as defined under WAC 173-400-113(1)) are subject to federal new source review requirements under the Prevention of Significant Deterioration (PSD) program. The purpose of the PSD program is to maintain air quality in areas that currently meet the standards, and to provide additional air quality protection to areas where maintaining pristine air quality is required. Since all areas in ORCAA's jurisdiction are currently listed as "in attainment" or "unclassified" with respect to the National Ambient Air Quality Standards, the PSD program applies to all new major sources and major modifications in ORCAA's jurisdiction.

The terms "major source" and "major modification" are defined specifically for the PSD program under WAC 173-400-113. For certain special source categories, a major source under the PSD program is one that has a potential to emit greater than 100 tons per year of any pollutant subject to regulation under the Federal Clean Air Act. For general source types, a major source is one that has a potential to emit greater than 250 tons per year or more of any regulated pollutant. The Washington State Department of Ecology has been delegated by the U.S. Environmental Protection Agency to implement Washington's PSD program in ORCAA's jurisdiction. The goal of the PSD program is to insure that construction of new major stationary sources and major modifications will not significantly degrade areas with pre-existing good air quality.

In February of 2007, under NOC (#06MOD517) Paneltech requested, and received approval of a 48 ton per year limit for facility-wide emission of VOCs. This limit established Paneltech as a minor stationary source with respect to PSD.

Section 7. Applicability of WA State Standards

Greenhouse Gas (GHG) Reporting Rule

According to WAC 173-441-030(1), the State GHG Reporting Rule applies to industrial facilities meeting the following two criteria:

1. Emit at least 10,000 metric tons per year of GHG in terms of carbon dioxide equivalents (CO₂e), including carbon dioxide from the combustion of biomass; and
2. Are part of an applicable source category listed in WAC 173-441-120 incorporated by reference from Title 40 CFR Part 98.

For Paneltech, the RTO system, the dryers/ovens from EU-1, the resin plant boiler (EU-4), and the composite press heater from EU-3, are the only unit that emits CO₂e. Per Title 40 CFR Part 98 Subpart C, the RTO system is defined as a stationary fuel combustion source. Actual CO₂e emissions from Paneltech's facility are below the threshold for reporting. However, since Paneltech's facility has the potential to emit this threshold, the State's GHG reporting requirements do apply.

Carbon Dioxide Mitigation Program

Carbon dioxide mitigation per Chapters 463-80 and 173-485 WAC are requirements for thermal electric generating facilities and, therefore, do not apply to Paneltech's facility.

Section 8. Monitoring

Monitoring conditions from Paneltech's NOCs were incorporated into the AOP with a few revisions in order to integrate requirements from all applicable National Emissions Standards for Hazardous Air Pollutants and to add CAM conditions. The following describes monitoring techniques required to verify compliance with this AOP.

Assuring compliance with hourly emissions limitations is accomplished indirectly by monitoring RTO conditions for consistency with conditions during stack tests performed during periods of peak production.

Assuring compliance with annual emissions limitations is accomplished by monitoring production rates, material usage, and operating conditions and by performing regular testing and maintenance.

All emissions of VOCs – including the primary TAPs: methanol, phenol, and formaldehyde – are ducted to the RTO. To verify that RTO destruction efficiency commensurate with tested values, the temperature in the RTO retention chamber is monitored continuously and RTO inlet static pressure is checked at least once per shift. RTO fuel (natural gas) consumption is monitored monthly.

The resin batch reactor and the associated cooling system and ductwork are monitored for leaks according to a plan consistent with 40 CFR Part 63, Subparts OOO and UU. If the reactor and associated systems are leak-free, emissions can be assumed to be proportional to resin production and consistent with NOC (# 04NOC365).

Paneltech maintains Material Safety Data Sheets (MSDSs) for all resins used in the paper coating line, including those resins produced on-site. Each MSDS provides the percentage by mass of free formaldehyde, phenol, and other compounds remaining after curing. In addition, methanol, which is used solely as a solvent, is assumed to evaporate on the coating line. By maintaining the coating line enclosure, monitoring resin and solvent usage, and ducting all emissions to the RTO, emissions from the coating line can be determined by mass balance and RTO destruction efficiency.

By monitoring natural gas consumption rates, emissions from natural gas combustion can be determined by applying factors from AP-42.

As resin use is already monitored based on use on the coating line, operation of the composite press can be assumed not to add any additional emissions by maintaining a permanent total enclosure consistent with the criteria in EPA Method 204.

Section 9. Permit Renewal, Revocation, Reopening, and Revisions

Permit Renewal

This AOP has been issued with a fixed term of five years. Unless the permittee submits a complete permit renewal application no later than six months before the expiration date, this AOP will expire. If a complete application is received in a timely manner, this AOP will remain in effect until a new AOP is issued or the application is denied.

The same procedural requirements that apply to a new AOP apply to permit renewal, including public participation and affected state and EPA review.

If ORCAA denies an application for a permit renewal, the same procedure for permit revocation applies. Denial of a renewal application can be contested by filing an appeal with the Pollution Control Hearings Board and serving a copy upon ORCAA within 30 days of receipt of the denial.

Permit Revocation

ORCAA may revoke this AOP at the request of the permittee or for cause. At least 30 days prior to revocation, ORCAA will submit a written notice to the permittee explaining the basis for the revocation and allowing the permittee an opportunity to meet with ORCAA. ORCAA may issue conditional revocations with a future effective date.

Revocation of an AOP can be contested by filing an appeal with the Pollution Control Hearings Board and serving a copy upon ORCAA within 30 days of receipt of the denial.

Opening for Cause

ORCAA will reopen and revise this AOP if any of the following occurs:

1. Additional requirements become applicable and the remaining permit term is 3 years or longer.
2. Additional requirements become applicable under the acid rain program.
3. ORCAA or the EPA determines that the AOP contains a material mistake or inaccurate information was used to set any of the terms or conditions of the permit.
4. ORCAA or the EPA determines that the AOP must be revised to assure compliance with any applicable requirement.

ORCAA will provide the permittee at least 30 days written notice before reopening an AOP for cause, unless an emergency requires a shorter time period. The same procedural requirements that apply to a new AOP apply to reopening and reissuing an AOP, including public participation and affected state and EPA review, except that only those part of the permit that have been modified are affected.

Continued – Section 9. Permit Renewal, Revocation, Reopening, and Revisions

Administrative Permit Amendments

An administrative permit amendment is a permit revision that:

1. Corrects typographical errors;
2. Identifies a name change, contact information, or similar administrative change;
3. Requires more frequent monitoring or record keeping;
4. Allows for a change in ownership or control; or
5. Incorporates conditions from a Notice of Construction (NOC), provided the NOC approval process substantially meets the same requirements as an AOP modification and no gap filling is required to verify compliance.

The permittee may request an administrative amendment, which ORCAA will either incorporate into the permit or deny within 60 days. ORCAA will then submit the revised permit to EPA.

Changes not Requiring Permit Revisions

The permittee may make a change at an AOP applicable facility without a permit revision if all of the following conditions are met:

1. The proposed changes are not Title 1 modifications;
2. The proposed changes do not result in an increase in emissions, either a rate or a total, beyond what is allowed by the permit;
3. The proposed changes do not alter permit terms required to enforce limitation on emissions from emission units covered by the permit; and
4. The permittee provides ORCAA and EPA written notification of the proposed changes at least 7 days prior to making the changes, unless an emergency requires swifter action.

A Title 1 modification is defined as any modification subject to a Part 111 standard (NSPS) or a Part 112 standard (NESHAP) or is subject to preconstruction review under the PSD program or in a nonattainment area.

Continued – Section 9. Permit Renewal, Revocation, Reopening, and Revisions

Minor Permit Modifications

A change that does require a permit revision may be classified as a minor permit modification if it meets the following conditions:

1. No applicable requirements are violated;
2. There are no *significant* changes to monitoring, reporting, or record keeping requirements;
3. There are no changes to case-by-case determinations regarding an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. The changes do not establish or change a permit term or condition assumed by the source for the purpose of avoiding an applicable requirement; and
5. No Title 1 modifications are proposed.

A Title 1 modification is defined as any modification subject to a Part 111 standard (NSPS) or a Part 112 standard (NESHAP) or is subject to preconstruction review under the PSD program or in a nonattainment area.

Requests for minor permit modifications must be made on official forms supplied by ORCAA and certified by a responsible official. Once ORCAA declares the application complete, it is ORCAA's responsibility to notify the EPA administrator and affected states and post notice on the Permit Register, which initiates a 21-day comment period.

Within 90 days of receiving an application for a minor permit modification or within 15 days after the end of EPA's 45-day review period, whichever comes last, ORCAA shall either:

1. Issue the modification as proposed;
2. Deny the proposed modification;
3. Determine that the proposed modification should be resubmitted as a major permit modification; or
4. Revise the draft permit modification and transmit to EPA.

The permittee may make the proposed changes immediately upon requesting the modification (unless a NOC is required). However, the permittee must continue to comply with the applicable requirements governing the change and the proposed terms and conditions. During this time period, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

Continued – Section 9. Permit Renewal, Revocation, Reopening, and Revisions

Major Permit Modifications

A change that does require a permit revision and does not qualify as a minor permit modification is a major permit modifications. Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit terms or conditions shall be considered significant. Major permit modifications must meet all the requirements of Chapter 173-401 WAC, including those for applications, public participation, review by affected states, and review by EPA, as they apply to permit issuance and permit renewal. ORCAA shall complete review on the majority of significant permit modifications within 9 months after receipt of a complete application.

Section 10. Regulatory Basis

Paneltech is required to operate with a Title V permit because it has the potential to emit methanol in excess of 10 tons per year and cumulative HAPs in excess of 25 tons per year. Paneltech has operated under either a permit application shield or under a permit at all times it was subject to Title V permit requirements.

The following Table 25 provides the regulatory basis for each permit condition as required by WAC 173-401-600(2) and 40 CFR 70.6(a)(1).

Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
P1. Permit Duration	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-610
P2. Federally Enforceable Requirements	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-625
P3. Compliance Maintenance	Permit Administration Authority: WAC 173-401-600(1)(a) Origins: WAC 173-401-510(2)(h)(iii); WAC 173-401-630(3)
P4. Duty to Supplement or Correct Application	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-500(6)
P5. False or Misleading Statements	Permit Administration Authority: WAC 173-401-600(1)(b) Origins: WAC 173-400-105 (state/local only); ORCAA Rule 7.2 (local only)
P6. Permit Renewal Modifications	Permit Administration Authority: WAC 173-401-710(1) Origin: WAC 173-401-710(1)
P7. Permit Modifications	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-725
P8. Standard Conditions	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-620(2)
P9. Permit Expiration – Application Shield	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-710(1)
P10. Permit Revocation	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-710(4)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
P11. Reopening for Cause	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-730
P12. Changes not Requiring Permit Revision/Off permit Changes	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-722; WAC 173-401-724
P13. Administrative Permit Amendments	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-720
P14. Greenhouse Gas Reporting Fee	Permit Administration Authority: WAC 173-401-600(1)(b) Origin: WAC 173-441-110 (state/local only)
P15. Confidential Information	Permit Administration Authority: WAC 173-401-600(1)(a) and (b) Origins: WAC 173-401-500(5); WAC 173-401-603(1); ORCAA Rule 1.6 (local only)
P16. Credible Evidence	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 60.11
P17. Certification	Permit Administration Authority: WAC 173-401-600(1)(a) Origins: WAC 173-401-520; WAC 173-401-615(3)(a); WAC 173-401-630(1)
P18. Emergency as Affirmative Defense	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-645
P19. Unavoidable Exceedances Excused	Permit Administration Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-107(6); ORCAA Rule 8.7(c) (local only)
P20. Part 63 Affirmative Defense for Violation of Emission Standards during Malfunction	Permit Administration Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 63.7501
G1. New Source Review	General Permit Conditions Authority: WAC 173-401-600(1)(b) Origin: ORCAA Rule 6.1 (local only)
G2. Demolition and Asbestos Projects	General Permit Conditions Authority: WAC 173-401-600(1)(b) Origin: ORCAA Rule 6.3 (state/local only)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
G3. Demolition and Renovation Projects	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR Part 61, Subpart M
G4. Prohibition of Emissions Detrimental to Persons and Property	General Permit Conditions Authority: WAC 173-401-600(1)(b) Origins: WAC 173-400-040(6) (state/local only); ORCAA Rule 67.6 (local only)
G5. Concealment and Masking Prohibited	General Permit Conditions Authority: WAC 173-401-600(1)(b) Origins: WAC 173-400-040(8) (state/local only); ORCAA Rule 7.5 (state/local only)
G6. Insignificant Emissions Units – Restriction	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-530
G7. Access of Inspection	General Permit Conditions Authority: WAC 173-401-600(1)(b) Origin: ORCAA Rule 1.5(e) (state/local only)
G8. Replacement or Substantial Alteration of Existing Control Equipment	General Permit Conditions Authority: WAC 173-401-600(1)(b) Origin: ORCAA Rule 6.1.10 (local only)
G9. Inspection and Entry	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-630(2)
G10. Fragmentation	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 63.4(c)
G11. Circumvention	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 63.4(b)
G12. Prohibited Activities	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 63.4(a)
G13. Temporary Sources	General Permit Conditions Authority: WAC 173-401-600(1)(a) and (b) Origins: WAC 173-401-635; ORCAA Rule 6.1.7
G14. Use of Alternative Performance Testing	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origins: 40 CFR 63.7(e)(2); 40 CFR 63.7(f); 63.7(h)(2) and (3); 40 CFR 63.997(e)(1)(iv)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
G15. Waiver of a Performance Test	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 63.7(h)
G16. Use of Alternative Monitoring Methods	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origins: 40 CFR 63.8(f); 40 CFR 63.996(d)
G17. Waiver of Recordkeeping or Reporting Requirements	General Permit Conditions Authority: WAC 173-401-600(1)(a) Origins: 40 CFR 63.10(f); 40 CFR 63.1416(f)(2)
FW1. Protection of Stratospheric Ozone	Facility-Wide Requirement Authority: WAC 173-401-600(1)(a) and WAC 173-401-605(1) Origins: 40 CFR 82 Subparts B, C, F, and H
FW2. Sulfur Dioxide Emissions Limitation	Facility-Wide Requirement Authority: WAC 173-401-600(1)(a) and (b); WAC 173-401-605(1) Origins: WAC 173-400-040(6); WAC 173-401-615(1)(b)
FW3. ORCAA Facility-Wide Emissions Limitations	Facility-Wide Requirement Authority: WAC 173-401-600(1)(c) Origin: OA (#03MOD335) Condition 3; OA (#06MOD517) Condition 3
FW4. Formaldehyde Emissions Limitation	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origin: ORCAA Rule 8.6 (local only)
FW5. Odor Control (State)	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); Origin: WAC 173-400-040(5) (state only)
FW6. Odor Control (Local)	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); Origin: ORCAA Rule 8.5 (local only)
FW7. Fugitive Emissions Control	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); Origin: WAC 173-400-040(4)(a)
FW8. Fugitive Dust Control	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); Origins: WAC 173-400-040(9)(a); ORCAA Rule 8.3(c) (state/local only)
FW9. Fallout	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); Origins: WAC 173-400-040(3) (state/local only); ORCAA Rule 8.3(e) (state/local only)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
FW10. Particulate Standards for Process Units	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origin: WAC 173-400-050(1)
FW11. Emissions Standards for Process Units (State)	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origin: WAC 173-400-060
FW12. Emissions Standards for Process Units (Local)	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origin: ORCAA Rule 8.3(a) (local only)
FW13. Control Equipment – Maintenance and Repair	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b) Origin: ORCAA Rule 8.8 (local only)
FW14. General Standards for Maximum Visual Emissions	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origins: WAC 173-400-040(2); ORCAA Rule 8.2 (state/local only)
FW15. Air Quality Complaints	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); Origin (state/local only): WAC 173-400-040(5); ORCAA 8.5; WAC 173-400-040(4)(a); WAC 173-400-040(9)(a); ORCAA 8.3(c); WAC 173-400-040(3); ORCAA 8.3(a)
FW16. Applicability of GHG Reporting Rule	Facility-Wide Requirement Authority: WAC 173-401-600(1)(b); Origins: WAC 173-441-030(1), and (3)-(5) (state only)
FW17. Use of New Materials	Facility-Wide Requirement Authority: WAC 173-401-600(1)(c) Origins: OA (#03MOD335) Condition 2; OA (#06MOD517) Condition 2
FW18. General Operation and Maintenance of Air Pollution Control Equipment	Facility-Wide Requirement Authority: WAC 173-401-600(1)(a) and (b) Origins: OA (#03MOD335) Condition 5; OA (#04NOC365) Condition 3; 40 CFR 64.7(b), 63.6(e)(1)(i), 63.8(c)(1)(i), 63.8(c)(1)(ii), and 63.8(c)(3)
FW19. General Performance Testing	Facility-Wide Requirement Authority: WAC 173-401-600(1)(a) and (b) Origins: ORCAA Rules 1.5(i) and 1.5(j) (local only); WAC 173-400-105(4); 40 CFR 63.7(d) and 63.997(c)(2)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
AR1.0 ORCAA BACT Emissions Limitations	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origins: OA (#03MOD335) Condition 4; OA (#06MOD517) Condition 4
AR1.1 Paper and Other Web Coating MACT Emissions Limitations	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.3320(a), 63.3320(b)(1), and 63.3370(n)(6)
AR1.2. ORCAA BACT Operation Limitations	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origin: OA (#03MOD335) Condition 5
AR1.3. Paper and Other Web Coating MACT RTO Operating Limitations	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.3321(a)
AR1.4. Paper and Other Web Coating MACT Capture System Operating Limitation	Requirement Specific to EU1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.3321(a)
AR1.5. Alternative Monitoring	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.3321(b)
AR1.6 Response to Malfunctions	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.6(e)(1)(ii), 63.8(c)(1)(i), 63.3340, and 63.1400(j)
AR1.7. Response to Excursions and Exceedances	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.6(e)(3)(i)(B) and 64.7(d)
AR1.8. Startup, Shutdown, and Malfunction Plan	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.3340 , 63.8(c)(1)(iii), and 63.6(e)(3)(i) and (v)-(ix)
AR1.9. General Operation and Maintenance of Equipment	Requirement Specific to EU-1 Authority: WAC 173-401-600(1)(a) and (b) Origins: 40 CFR 63.6(e)(1)(i); ORCAA Rule 8.8 (local only)
AR1.10. General Duty	Requirements Specific to EU-1 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.3340, 64.7(b), 63.6(e)(1)(i), 63.6(e)(3)(i)(A), 63.7500(3), and 63.8(c)(1)(i)
AR1.11. Quality Improvement Plan for CAM	Requirements Specific to EU-1 Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 64.8

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
AR2.0. ORCAA BACT Operation and Emissions Limitations	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origin: OA (#04NOC365) Condition 3
AR2.1. Amino/Phenolic Resins Production MACT Emissions Limitations	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: OA (#04NOC365) Condition 3; 40 CFR 63.1400(k)(1), 63.1403(a) and (b)(1), 63.1406(a)(1)(ii), 63.1408(a), and 63.1413(e)(1)
AR2.2. Control Level 2 MACT Emissions and Operating Limitations	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a) and (c); WAC 173-401-605(1) Origins: OA (#04NOC365) Condition 7; 40 CFR 63.1034, 63.1400(k)(2), 63.1411(d), and 63.1413(a)
AR2.3. Alternative Means of Emissions Limitation	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.1021
AR2.4. Equipment Leaks – Control Level 2 MACT Emissions Limitations	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a) and (c); WAC 173-401-605(1) Origins: OA (#04NOC365) Condition 7; 40 CFR 63.1410, 63.1025, 63.1026, 63.1029, 63.1030, and 63.1400(k)(2)
AR2.5. Closed Vent MACT Emissions Standards	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.1403(a) and 63.982(a)(2), (c)(2), and (f)
AR2.6. Amino/Phenolic Resins Production MACT Operating Limitations	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.1400(k)(1), 63.1413(a)(3), 63.1413(a)(4), and 63.1413(e)(1)
AR2.7. Pressure Relief Valves Operating Limitations	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.1411(a)
AR2.8. Pressure release Prohibition	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.1411(c)
AR2.9. Heat Exchange System Leaks	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origin: OA (#04NOC365) Condition 6
AR2.10. Waste Water Disposal	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origin: OA (#05NOC428) Condition 1
AR2.11. Resin Dryer Operation	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origin: OA (#07NOC561) Condition 2

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
AR2.12. General Operation and Maintenance of Process Equipment	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(b) and (c); WAC 173-401-605(1) Origins: OA (#04NOC365) Condition 3; ORCAA Rule 8.8 (local only)
AR2.13. General Duty	Requirements Specific to EU-2 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.996(c)(2), 63.1400(k)(3), and 63.1400(k)(4)
AR3.0 Material Usage Limitation (BACT)	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origins: OA (#03MOD335) Condition 4; OA (#06MOD517) Condition 4
AR3.1 Paper and Other Web Coating MACT Emissions Limitations	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.3320(a), 63.3320(b)(1), and 63.3370(n)(6)
AR3.2. Paper and Other Web Coating MACT RTO Operating Limitations	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.3321(a)
AR3.3. Paper and Other Web Coating MACT Capture System Operating Limitation	Requirement Specific to EU3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.3321(a)
AR3.4. Alternative Monitoring	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.3321(b)
AR3.5. Total Enclosure Standards	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(c); WAC 173-401-605(1) Origin: OA (#06NOC469) Condition 2
AR3.6 Response to Malfunctions	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.6(e)(1)(ii), 63.8(c)(1)(i), 63.3340, and 63.1400(j)
AR3.7. Response to Excursions and Exceedances	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.6(e)(3)(i)(B) and 64.7(d)
AR3.8. Startup, Shutdown, and Malfunction Plan	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.3340 , 63.8(c)(1)(iii), and 63.6(e)(3)(i) and (v)-(ix)
AR3.9. General Operation and Maintenance of Equipment	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a) and (b) Origins: 40 CFR 63.6(e)(1)(i); ORCAA Rule 8.8 (local only)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
AR3.10. General Duty	Requirements Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.3340, 64.7(b), 63.6(e)(1)(i), 63.6(e)(3)(i)(A), 63.7500(3), and 63.8(c)(1)(i)
AR3.11. Quality Improvement Plan for CAM	Requirements Specific to EU-3 Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 64.8
AR4.0. Boiler MACT Work Practice Standards	Requirement Specific to EU-4 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.7500(a)(1)
AR4.1. Boiler MACT Energy Assessment	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.7500(a)(1)
AR4.2. General Operation and Maintenance of Process Equipment	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: ORCAA Rule 8.8 (local only)
AR4.3. Alternative Work Practice Standards	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: 40 CFR 63.7500(b)
AR4.4 General Duty	Requirement Specific to EU-3 Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origins: 40 CFR 63.3340, 63.6(e)(1)(i), 63.7500(3), 63.8(c)(1)(i)
AR5.0 Operating Conditions	Requirement Specific to Temporary Internal Combustion Engines Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origin: WAC 173-401-635
AR5.1. Notice of Intent to Operate (NOI)	Requirement Specific to Temporary Internal Combustion Engines Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origin: ORCAA Rule 6.1.7
AR5.2. Emissions Standards	Requirement Specific to Temporary Internal Combustion Engines Authority: WAC 173-401-600(1)(a); WAC 173-401-605(1) Origin: ORCAA Rule 6.1.7
AR5.3. Engine Fuel Requirements	Requirement Specific to Temporary Internal Combustion Engines Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origins: ORCAA 6.1.1(c); WAC 173-400-035(3)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
AR5.4. General Operation and Maintenance of Equipment	Requirement Specific to Temporary Internal Combustion Engines Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1) Origin: ORCAA Rule 8.8 (local only)
M1. ORCAA BACT	Monitoring Requirements – Compliance Demonstration Authority: WAC 173-401-615(1)(a) and (b) Origins: WAC 173-401-615(1)(b); OA (#03MOD335) Condition 7; OA (#04NOC365) Condition 5; OA (#06NOC469) Condition 2
M2. Paper and Other Web Coating MACT	Monitoring Requirements – Compliance Demonstration Authority: WAC 173-401-615(1)(a) and (b) Origins: WAC 173-401-615(1)(b); 40 CFR 63.6(2); 40 CFR 63.7(a)(2); 40 CFR 63.7(e); 40 CFR 63.8; 40 CFR 63.3370(a), (e), and (k)
M3. Manufacture of Amino/Phenolic Resins MACT	Monitoring Requirements – Compliance Demonstration Authority: WAC 173-401-615(1)(a) and (b) Origins: WAC 173-401-615(1)(b); OA (#04NOC635) Conditions 3, 4, and 5; OA (#07NOC561) Condition 2; 40 CFR 63.1415, and 63.1413(a) and (e); 40 CFR 63.6(2); 40 CFR 63.7(a)(2); 40 CFR 63.7(e); 40 CFR 63.8; 40 CFR 63.1413(a)(3) and (e)(1)(i); 40 CFR 63.1413(e)(1)(ii) and (iii);
M4. Resin Plant Leaks MACT	Monitoring Requirements – Compliance Demonstration Authority: WAC 173-401-615(1)(a) and (b) Origins: WAC 173-401-615(1)(b); OA (#04NOC635) Condition 7, 40 CFR 63.1023; 40 CFR 63.6(2); 40 CFR 63.7(a)(2); 40 CFR 63.7(e); 40 CFR 63.8; 40 CFR 63.1410(b)
M5. Closed Vent System MACT	Monitoring Requirements – Compliance Demonstration Authority: WAC 173-401-615(1)(a), (b), and (c) Origins: WAC 173-401-615(1)(b); OA (#04NOC365) Conditions 5 and 7; OA (#07NOC561) Condition 2; 40 CFR 63.983; 40 CFR 63.6(2); 40 CFR 63.8; 40 CFR 63.1415(d)
M6. Opacity Compliance Demonstration	Monitoring Requirements – Compliance Demonstration Authority: WAC 173-401-615(1)(b) Origin: WAC 173-401-615(1)(b)
M7. Emissions Calculations	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) and (b) Origins: WAC 173-401-615(1)(b); OA (#03MOD335) Condition 7; OA (#04NOC365) Conditions 5 and 7; OA (#06NOC469) Condition 2; OA (#07NOC561) Condition 2; 40 CFR 63.3370; 40 CFR 63.1413(e)(2)(i)(C); 40 CFR 63.1414(d); 40 CFR 63.3360(g)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
M8. RTO Destruction Efficiency	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) and (b) Origins: WAC 173-401-615(1)(b); OA (#03MOD335) Condition 6 and 7; OA (#04NOC365) Condition 4, 5, and 7; OA (#06NOC469) Condition 2; OA (#07NOC561) Condition 2; 40 CFR 63.7(c) and (e); 40 CFR 63.1413(a); 40 CFR 63.1414; 40 CFR 63.1413(e)(1); 40 CFR 63.3360(e); 40 CFR 63.997(e)(v); 40 CFR 63.3350(e)(7); 40 CFR 63.3360(e); 40 CFR 63.1413(a)(2); 40 CFR 63.997(e)(1)(iii)
M9. Continuous Parameter Monitoring System	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a), (b), and (c) Origins: WAC 173-401-615(1)(b); OA (#03MOD335) Condition 7; OA (#04NOC365), Conditions 5 and 7; OA (#06NOC469) Condition 2; 40 CFR 63.6, 63.7, and 63.8; 40 CFR 63.3350(e); 40 CFR 63.996; 40 CFR 63.1415(a) and (b)(5); 40 CFR 63.2269(a) and (b); 40 CFR 63.1413(a) and (e); 40 CFR 63.1415; 40 CFR 63.3370; 40 CFR 64.3; 40 CFR 64.7(c) and 40 CFR 64.6(c)(4); 40 CFR 64.7(b); 40 CFR 63.8(d); 40 CFR 63.8(e)
M10. Capture System Efficiency	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#03MOD335) Condition 7; OA (#06NOC469) Condition 2; 40 CFR 63.3360(f); 40 CFR 63.3370(e)
M11. Capture System Monitoring	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#03MOD335) Condition 7; OA (#06NOC469) Condition 2; 40 CFR 63.3350(a) and (f)(4); 40 CFR 63.3370(e)
M12. Heat Exchange System Monitoring	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(b) Origins: WAC 173-401-615(1)(b); OA (#04NOC365) Condition 6
M13. Closed Vent System Inspection	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#04NOC365) Conditions 5 and 7; OA (#06NOC469) Condition 2; 40 CFR 63.938(b) and (c)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
M14. Closed Vent System Leak Repair	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#04NOC365) Conditions 5 and 7; OA (#06NOC469) Condition 2; 40 CFR 63.983(d)
M15. Resin Plant Equipment Leak Monitoring General Procedures	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) and (c) Origins: OA (#04NOC365) Condition 7; 40 CFR 63.1023(b)(1); 40 CFR 63.1023(b)(2); 40 CFR 63.1023(b)(3); 40 CFR 63.1023(b)(4); 40 CFR 63.1023(c); 40 CFR 63.1023(d); 40 CFR 63.8(a)(4)(e); 40 CFR 63.1024; 40 CFR 63.983(d)(2); 40 CFR 63.1023(e); 40 CFR 63.1024(d); 40 CFR 63.1024(e)
M16. Valves in Gas and Vapor Service and in Light Liquid Service	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#04NOC365) Condition 7; 40 CFR 63.1025
M17. Pumps in Light Liquid Service	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#04NOC365) Condition 7; 40 CFR 63.1026; 40 CFR 63.1035
M18. Connectors in Gas and Vapor Service and in Light Service	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#04NOC365) Conditions 7; 40 CFR 63.1027
M19. Pressure Relief Devices in Gas or Vapor Service	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) and (c) Origins: OA (#04NOC365) Conditions 7; 40 CFR 63.1030; 40 CFR 63.1411(b) and (c); 40 CFR 63.1411(c); 40 CFR 63.1411(d)
M20. Alternate Means of Emissions Limitation: Batch Cycle Processes	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: OA (#04NOC365) Conditions 7; 40 CFR 63.1036
M21. Boiler Tune-Up	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origins: 40 CFR 63.7510(e); 40 CFR 63.7515(d); 40 CFR 63.7540(a)(10)(i)-(vi); 40 CFR 63.7540(a)(13); 40 CFR 63.7510(e)
M22. One-Time Energy Assessment	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) Origin: : 40 CFR 63.7500(a)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
M23. GHG Monitoring Requirements	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(a) and (b) Origin: WAC 173-401-615(1)(b)
M24. Complaint Monitoring	Monitoring Requirements – Methods and Procedures Authority: WAC 173-401-615(1)(b) Origin: WAC 173-401-615(1)(b)
RK1. Retention and Availability of Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (c) Origin: WAC 173-401-615(2)(c)
RK2. Record of Changes	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (b) Origin: WAC 173-401-615(2)(b)
RK3. Monitoring Records – General Requirements	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: WAC 173-401-615(2)(a)
RK4. Record of Permit Deviations	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: WAC 173-401-615(3)(b)
RK5. Availability of Emissions Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origins: WAC 173-400-105(1); ORCAA Rule 8.1
RK6. Unlawful Reproduction or Alteration of Documents	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: ORCAA Rule 7.3 (local only)
RK7. Records of Official Documents	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: ORCAA Rule 7.4 (local only)
RK8. Records of Complaints	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: WAC 173-401-615(1)(b)
RK9. MACT Recordkeeping	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origins: OA (#04NOC365) Condition 8; 40 CFR 63.10(b); 40 CFR 63.998; 40 CFR 63.1416

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
RK10. MACT Applicability Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origins: 40 CFR 63.1(b)(3); 40 CFR 63.10(b)(3)
RK11. Startup, Shutdown, and Malfunction Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origins: 40 CFR 63.6(e)(3)(iii); 40 CFR 63.10(b)(2)(ii); 40 CFR 63.10(c)(7), (10), (11) and (15); 40 CFR 63.3410(a)(1) and (2)
RK12. Resin Plant Closed Vent System Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origins: OA (#04NOC365) Condition 8; 40 CFR 63.983(b); 40 CFR 63.998(d)(1)(i); 40 CFR 63.998(d)(1)(iii); 40 CFR 63.998(d)(1)(iv); 40 CFR 63.1416(d)(3)(ii)(B)
RK13. Resin Plant Heat Exchange System Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origins: WAC 173-401-615(1)(b); OA (#04NOC365) Condition 8
RK14. Resin Plant Equipment Leak Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (c) Origins: OA (#04NOC365) Condition 8; 40 CFR 63.1038; 40 CFR 63.1038(b)-(c); 40 CFR 63.1023(e)(2); 40 CFR 63.1024(f); 40 CFR 63.1024(d); 40 CFR 63.1038(c)(1); 40 CFR 63.1035(e); 40 CFR 63.1038©(8); 40 CFR 63.1036(b)(7) and (d); 40 CFR 63.1022(a)
RK15. Pressure Relief Device Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (c) Origins: OA (#04NOC365) Condition 8; 40 CFR 63.1411(c)(2); 40 CFR 63.1416(g)(5)
RK16. Boiler MACT Compliance Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.7555
RK17. CPMS Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (c) Origins: OA (#03MOD335) Condition 8; OA (#04NOC365) Condition 8; 40 CFR 63.3410; 40 CFR 63.350(e)(5); 40 CFR 63.998(c)(1); 40 CFR 63.1416(c), (d), (e), and (f); 40 CFR 63.8(d)(3); 40 CFR 63.1416(c)(1), (2), and (3); 40 CFR 63.3350(e); 40 CFR 63.998(b)(1)-(3)(i), 40 CFR 63.1416(c)(3); 40 CFR 63.998(b)(3)(ii); 40 CFR 63.10(b)(2)(vii) and (ix); 40 CFR 63.10(c)(1); 40 CFR 63.10(b)(2)(vi), (c)(5) and (c)(6); 40 CFR 63.10(c)(12); 40 CFR 63.10(c)(13); 40 CFR 63.3350(e)(5); 40 CFR 63.10(b)(2)(x); 40 CFR 63.10(b)(2)(xi); 40 CFR 63.10(b)(2)(viii); 40 CFR 998(e)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
RK18. Reduced Recordkeeping Program	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.1416(h)
RK19. RTO Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (c) Origins: OA (#03MOD335) Condition 8; OA (#04NOC365) Condition 8; 40 CFR 63.998
RK20. Performance Testing Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (c) Origins: OA (#03MOD335) Condition 8; OA (#04NOC365) Condition 8; 40 CFR 63.7(g); 40 CFR 63.10(b)(2)(iii); 40 CFR 63.988(a); 40 CFR 63.3360(e)(2); 40 CFR 63.10(ix); 40 CFR 63.7(g); 40 CFR 63.998(a)(2)(ii)(B)(1); 40 CFR 63.1413€(ii)(B)(3); 40 CFR 63.1413€(iii)
RK21. Other Monitoring Equipment Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) and (c) Origins: OA (#04NOC365) Condition 8; 40 CFR 63.10(b)(2)(iii)
RK22. Resin Dryer Recordkeeping	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: OA (#07NOC561), Condition 4
RK23. Malfunction Records	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origins: OA (#04NOC365) Condition 8; 40 CFR 63.1416(b)
RK24. Records Required for Greenhouse (GHG) Reporting	Recordkeeping Requirements Authority: WAC 173-401-615(2)(a) Origin: WAC 173-441-050(6) (state only)
RP1. Certification of Reports	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origin: WAC 173-401-630(1)
RP2. Annual Certification	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origin: WAC 173-401-630(5)
RP3. MACT Initial Notification	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: ORCAA 8.11(b); 40 CFR 63.9(b)(2)
RP4. MACT Notification of Extension of Compliance	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origin: 40 CFR 63.9(c)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
RP5. General MACT Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: OA (#04NOC365) Condition 9; ORCAA 8.11(b); 40 CFR 63.6; 40 CFR 63.10
RP6. General MACT Notifications	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: OA (#04NOC365) Condition 9; ORCAA 8.11(b); 40 CFR 63.9; 40 CFR 63.7
RP7. Annual Inventory Report	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origin: WAC 173-401-615(1)(b); ORCAA Rule 4.3
RP8. Notification of Control Equipment Malfunction	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origin: WAC 173-401-615(1)(b)
RP9. Permit Deviation Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) and (b) Origins: OA (#04NOC365) Condition 9; WAC 173-401-615(3)(b); WAC 173-400-107(3); 40 CFR 63.6(e)(3)(iv)
RP10. Periodic Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: WAC 173-401-615(1)(a) and (b)
RP11. Compliance Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: WAC 173-401-615(1)(b); OA (#04NOC365) Condition 9; 40 CFR 63.10(d); 40 CFR 63.3400(c); 40 CFR 63.1417(f) and (g); 40 CFR 63.1039(b); 40 CFR 63.999(b); 40 CFR 63.7550
RP12. Notification of Need for Improved Monitoring for CAM	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: WAC 173-401-615(1)(b); 40 CFR 64.7(e)
RP13 Immediate SSMP Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: 40 CFR 63.3400(g); 40 CFR 63.10(d)(5)
RP14. Electronic Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: WAC 173-401-615(1)(b); 40 CFR 63.1417(h)(8)
RP15. Notification of Complaint Received	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origin: WAC 173-401-615(1)(b)

Continued – Section 10. Regulatory Basis

Continued – Table 25: Statement of Basis

AOP CONDITION	REGULATORY BASIS
RP16. Additional Resin Plant Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: OA (#04NOC365) Condition 9; 40 CFR 63.1417(h)(4) and (5)
RP17. Performance Testing Notification	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: WAC 173-401-630(1); OA (#03MOD335) Condition 9; 40 CFR 63.3400(d); 40 CFR 63.7(b); 40 CFR 63.9(e)
RP18. Performance Test Results	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: WAC 173-401-630(1); OA (#03MOD335) Condition 9; 40 CFR 63.7(g); 40 63.999(2)
RP19. State Greenhouse Gas (GHG) Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origin: (State Only) WAC 173-441, dated 12/1/10
RP20. Boiler MACT Reporting	Reporting Requirements Authority: WAC 173-401-615(3)(a) Origins: WAC 173-401-630(1); 40 CFR 63.7545(e)
S1. Permit Shield	Permit Shield Authority: WAC 173-401-600(1)(a) and (b) Origin: WAC 173-401-640(1)
S2. Inapplicable	Permit Shield Authority: WAC 173-401-600(1)(a) and (b) Origin: WAC 173-401-640(2)
S3. Exclusions	Permit Shield Authority: WAC 173-401-600(1)(a) and (b) Origin: WAC 173-401-640(4)