Project XL: Imation Camarillo Streamlining Analysis

A streamlining analysis has been performed, according to the methodology of *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program* (March 6, 1996), on the federal new source performance standards, federal hazardous air pollutant standards, and the Ventura County requirements which currently apply to VOC and/or HAP emissions from existing coating operations of the Camarillo site, or which will apply to new or modified coating facilities. The streamlining analysis demonstrates that current applicable requirements (40 CFR Part 60 Subpart SSS and Ventura County APCD Rules 52, 53, 74.3, and 74.6.1) and future or potential applicable requirements (40 CFR Part 63 Subpart EE and 40 CFR Part 60 Subparts RR, TT, and VVV, and Kb, and Ventura County APCD Rule 71.2) can be met by the distilled requirements of 40 CFR Part 63 Subpart EE, with some modification (for example, to account for the fact that Subpart EE does not address VOC emissions), and a few selected additions from subsumed standards.

Table 1 identifies the affected facilities or affected sources addressed by the streamlined requirements. Table 2 compares the circumstances under which each rule applies (with respect to existing or newly constructed/modified/reconstructed equipment) and the timing for initial compliance. Tables 3 through 8 compare standards for VOC and/or HAPs in each rule according to the type of equipment addressed by the rule (i.e. coating equipment in Table 3, coating mix preparation equipment in Table 4, etc.). Consistent with the methodology of White Paper #2, the VOC and HAP standards are addressed in Tables 3 through 8 according to the separate aspects of "emissions limits," "compliance basis," and "compliance demonstration," with these separate aspects then considered as a whole for purposes of arriving at the streamlining conclusion that is stated at the head of each of the tables.

Table 9 addresses standards for VOC and/or HAPs for the miscellaneous subjects of cleanup solvents and enclosures. The aspects of "emissions limits," "compliance basis," and "compliance demonstration" addressed in Tables 3 through 8 effectively do not apply to the subjects of Table 9.

Tables 10 through 12 address the monitoring requirements of each of the streamlined rules. The streamlining conclusions are more broadly stated in these tables, consistent with White Paper #2 guidance which generally prescribes that the monitoring requirements of the most stringent individual rule be carried forward.

Tables 3 through 12 are based on a citation-by-citation analysis of each of the regulations included in this streamlining analysis. For the citation-by-citation analysis, each regulatory requirement was evaluated with respect to its applicability to the Camarillo Project XL site and with respect to the manner in which it should be included in the streamlining analysis. This full analysis is available in the record.

TABLE 1 – STREAMLINING ANALYSIS
LISTING OF STREAM-LINED REGULATIONS WITH DESCRIPTION OF APPLICABILITY, AFFECTED FACILITIES (NSPS), AND/OR AFFECTED SOURCES (MACT)

Coating Rules:

40 CFR Part 60 Sub. RR	**Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations**
	Each coating line used in the manufacture of pressure sensitive tape and label materials .... 440(a) **PARTIALLY EXEMPT:** • Affected facility which inputs to the coating process ≤45 Mg of VOC per 12 mo. ... 440(b)
40 CFR Part 60 Sub. TT	**Standards of Performance for Metal Coil Surface Coating**
	Each of th e following located at a metal coil surface coating operation [460(a)]: • prime coat • finish coat operation • each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.
40 CFR Part 60 Sub. SSS	**Standards of Performance for Magnetic Tape Coating Facilities**
	Each coating operation; and each piece of coating mix preparation equipment .... 710(a) **EXEMPT:** • New coating operation that utilizes less than 38 m[3] of solvent or any modified or reconstructed coating operation that utilizes less than 370 m[3] of solvent for the manufacture of magnetic tape per calendar year 710(b)
40 CFR Part 60 Sub. VVV	**Standards of Performance for Polymeric Coating of Supporting Substrates Facilities**
	Each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates .... 740(a) **EXEMPT:** • Coating mix preparation equipment or coating operations when used with waterborne coatings if VOC content of the coating ≤ 9 % wt. of the volatile fraction 740(d)(2) • Web coating operations that print an image on the surface of the substrate or any coating applied on the same printing line that applies the image. 740(d)(3) • **PARTIALLY EXEMPT**: < 95 MG VOC used per 12 mo 740(b)
VCAPCD Rule 74.3	**Paper, Fabric and Film Coating Operations**
	Any application process involving the coating of paper, fabric or film .... 74.3.A **EXEMPT** [74.3.C]: • Start-ups -- B.1.b and B.1.c -- not apply during the first 24 hours of a scheduled carbon adsorption system start-up. • Other
40 CFR Part 63 Sub. EE	**Magnetic Tape Manufacturing Operations**
	Each new and existing magnetic tape manufacturing operation located at a major source of HAP emissions .... 701(a)(1), 701(c) **EXEMPT** [701(b)]: • Research or laboratory facilities • Coating operation that produces a quantity of magnetic tape that is ≤ 1% of total production (total SF coated basis) from that coating operation in any 12-month period

Project XL FPA:

FPA	Entire Camarillo plant site

Other Rules:

40 CFR Part 60 Sub. Kb	**Standards of Performance for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984**

	Each storage vessel with a capacity ≥ 40 m3 (10,500 gal) used to store volatile organic liquids (VOL's) .... 110b(a)
	EXEMPT:
	• Pressure vessels designed to operate in >204.9 kPa (29.7 psi) and without emissions to the atmosphere .... 110b(d)(2)
	• Vessels permanently attached to mobile vehicles such as trucks, railcars .... 110b(d)(3)
	• **PARTIALLY EXEMPT**: tanks < 75 m3 (19,800 gal) .... 110b(b)
	• **PARTIALLY EXEMPT**: [110b(c)]:
	  • tanks: V ≥151 m^3 (39,900 gal) .... and V.P <3.5 kPa (0.508 psi)
	  • tanks: 75 (19,800 gal) ≥ V <151 m^3 (39,900 gal) .... and VP < 15.0 kPa (2.18 psi)

VCAPCD Rule 71.2	**Storage of Reactive Organic Compound Liquids**
	Equipment to store ROC liquids with a modified Reid VP > 0.5 psia. .... [A] **EXEMPT:** ..... • Storage equip. subject to Rule 71.1 .... A • Gasoline storage container ≤ 40,000 gal and subject to Rule 70 .... A, G.1.d • Any storage container ≤ 5,000 gal .... A, G.1.a • **PARTIALLY EXEMPT**: out-of-service or empty tanks when undergoing cleaning, stock change, tank and roof repairs or removal of contaminated stock – exempt from most requirements; reporting required .. G.3 • **PARTIALLY EXEMPT**: in-service tanks undergoing preventative maintenance, including but not limited to repair of regulators, fittings, valves, flame arrestors -- reporting required.... G.5
VCAPCD Rule 52	**Particulate Matter - Concentration (Grain Loading)**
	PM emission sources **EXEMPT:** .....Combustion of liquid or gaseous fuels in steam generators or gas turbines
VCAPCD Rule 53	**Particulate Matter - Process Weight**
	PM emission sources
VCAPCD 74.6.1	**Cold Cleaners**
	Cold cleaners with > 2% wt. organic solvent..... [74.6.1.A]

TABLE 2 – STREAMLINING ANALYSIS
SUBJECT: WHEN RULES APPLY and INITIAL COMPLIANCE TIMING

	WHEN RULES APPLY	INITIAL COMPLIANCE TIMING
Streamlining Conclusion →	40 CFR 63 Subpart EE -- Applies to all new and existing operations that meet the source definition [Less stringent other rules -- typically grandfather existing sources until such time that they are modified or reconstructed]	40 CFR 63 Subpart EE -- Immediately upon start-up [Less stringent, other rules -- typically defer initial compliance to the date of the performance test]
How Addressed in ↓		
60 Sub. RR	Commence construct/ modify/ reconstruct after 12/30/80 .... 440(c)	On and after initial performance test of 60.8 .... 442(a)
60 Sub. TT	Commence construct/ modify/ reconstruct after 1/5/81 .... 460(b)	On and after initial performance test of 60.8 .... 462(a)
60 Sub. SSS	Commence construct/ modify/ reconstruct after 1/22/86 .... 710(c)	On and after initial performance test of 60.8, but not later than [712] • 60 d after achieving the maximum production rate at which the affected facility will be operated, or • 180 days after initial startup, whichever date comes first
60 Sub. VVV	Commence construct/ modify/ reconstruct after 4/30/87 .... 740(c)	On and after initial performance test of 60.8, but not later than [742(a)]: • 60 d after achieving max. production rate at which the affected facility will be operated, or • 180 days after initial startup, whichever date comes first.
VCAPCD 74.3	NA	NA
63 Sub. EE	New and existing according to Part 60 Subpart A .... 701(d)	**IF:** new affected source **THEN:** immediately upon startup of the affected source .... 701(e)
Project XLFPA	NA	NA
60 Sub. Kb	Commence construct/ modify/ reconstruct after 7/23/84 .... 110b(a)	NA
VCAPCD 71.2	NA	NA
VCAPCD 52	NA	NA
VCAPCD 53	NA	NA
VCAPCD 74.6.1	NA	NA

TABLE 3 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS – COATING EQUIPMENT

Streamlining Conclusion →

- 40 CFR 63 Subpart EE – all requirements (plus more stringent 72-hour rolling average, rolled hourly)
- FPA -- PAL : ≤ 150 tpy VOC; measurement of emission of individual HAPs by FTIR

Less Stringent:

60 Sub TT: control efficiency less stringent at 90%

60 Sub VVV:
- control efficiency of 95% with total enclosure is equally stringent
- compliance basis -- solvent recovery: 1-mo. avg., material balance basis is less stringent than 72-hr basis with direct emission measurement by CEMS
- compliance basis – incineration: reliance on result of the most recent performance test (to set temperature surrogates) is less stringent than that plus FTIR measurement of individual HAP emissions
- no direct requirements on capture efficiency

60 Sub RR: control efficiency less stringent at 90%

60 Sub SSS:
- control efficiency of 95% equally stringent, but required only if concurrent construction of new VOC control device (unless condenser)
- compliance basis -- solvent recovery: initial compliance test followed by 3-cycle or 3-day avg. of outlet conc. or control efficiency as determined by CEM less stringent than 72 hour average rolled hourly
- compliance basis – incineration: reliance on result of the most recent performance test (to set temperature surrogates) is less stringent than that plus FTIR measurement of individual HAP emissions

VCAPCD Rule 74.3: control efficiency less stringent at 90%; exempts some start-up emissions

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
60 Sub. RR	**FOR EACH AFFECTED FACILITY** ≥90% overall VOC emission reduction, each affected facility 442(a)(2)(i)	Averaging period -- calendar month basis .... 442(a)(2)(i), 443(f) Emissions from startups and shutdowns to be included .... 443(j)	**IF:** solvent recovery .... **THEN:** mass balance over a calendar month .... 443(c), 444(b) **IF:** solvent destruction .... **THEN:** • Performance test; avg of 3 runs • calendar monthly compliance determined by the most recently performed performance test .... 443(d), 444(c) **IF:** common emission control device for more than one affected facility, ... **THEN:** • Performance of that control device is assumed to be equal for each of the affected facilities • Compliance test performed simultaneously on all affected facilities .... 443(g) **IF:** common SRU applied to existing facility(ies) and an affected facility(ies) .... **THEN**: first determine SRU performance on existing facility (ies), then on combined existing facility(ies) and affected faciity(ies) .... 443(h) **IF:** common solvent destruction device applied to existing facility (ies) and an affected facility(ies) .... **THEN**: single performance test – scale measured VOC concentrations according to flow contributed by existing and affected facility(ies) ..... 443(i)
60 Sub. TT	**FOR EACH AFFECTED FACILITY** **IF:** continuous use of emission control device .... **THEN:** 90% control of applied VOCs, calendar month basis, each affected facility .... 462(a)(3)	**Initial**: performance test over 1 month unless incineration **Ongoing**: each calendar mo. or most recent result of compliance test if incineration ... 463(b)	**IF:** thermal oxidizer .... **THEN:** Compliance test to determine overall control efficiency .... 463(c)(2) **IF:** solvent recovery .... **THEN:** Compliance determination by mass balance over a calendar month .... 463(c)(3) **AND:** Each monthly calculation constitutes a performance test .... 463(c)(3)(vi)

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
60 Sub. SSS	**FOR EACH NEW COATING OPERATION:** ≥93% control of VOCs applied at the coating applicator .... 712(a) **FOR EACH MODIFIED/ RECONSTRUCTED COATING OPERATION** **IF**: total enclosure and ≥92% control prior to modification or reconstruction .... **THEN**: continued use of enclosure and previous level of control, or 95%, whichever lower **IF**: control device subsequently replaced .... **THEN**: install ≥95% control device and total enclosure 712(b)(2)	Emissions from startups and shutdowns to be included .... 713(c)	Meet criteria for total enclosure ..... 713(b)(5)(i) **AND** Determination of control device efficiency .... 713(b)(5)(ii) Monitoring devices installed and calibrated prior to performance demonstration • according to the manufacturer's specifications • in locations to provide representative values 714
60 Sub. VVV	**FOR EACH COATING OPERATION** ≥ 95% control VOC with total enclosure .... 742(c)(1), (2)	**IF:** Performance test .... **AND**: incinerator .... **THEN:** avg. of 3 separate runs, each ≥ 30 min .... 745(b) **IF:** Performance test .... **AND**: carbon adsorption .... **THEN**: avg. of 3 separate runs, each coinciding with one or more complete system rotations through the adsorption cycles of all the individual adsorber vessels. .... 745(b)(1) Emissions from startups and shutdowns to be included ..... 743(a)(3)(v)	Criteria for total enclosure .... 743(b)(1) **AND** Determination of control device efficiency .... 743(b)(2): **IF**: Thermal oxidizer, catalytic oxidizer, or carbon **EXCEPT** fixed-bed carbon adsorption system with individual exhaust stacks for each adsorber vessel .... **THEN:** Gaseous emission test – concentration and flow measurements at inlet and outlet .... 743(a)(1)(iv) **IF:** VOC recovery device dedicated to single affected coating operation .... **THEN:** • Monthly liquid material balance • Location of measurement of recovered solvent – prior to separation/purification (unless otherwise approved) .... 743(a)(3)(vi), 743(a)(3)(vi) **IF:** VOC recovery device dedicated to single affected coating operation .... **THEN:** • Liquid material balance every 3-7 days (period determined by "representative preformance of the facility) • Continuous monitoring per 60.744 .... 743(a)(4)
VCAPCD 74.3	**FOR COATING MATERIAL IN ANY APPLICATION PROCESS:** Overall control ≥ 90 % [capture and destruction efficiency], **UNLESS**: applied coating is > 1200 g ROC/L of coating applied, less water and less	Averaging periods are 24-hours Rule exempts sources from emission limits during star-up of carbon adsorption system (maximum of six start-up exemptions per year)	NA

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
	exempt solvent, **THEN**: ≤ 120 g ROC/L of coating applied, less water and less exempt solvent, ... 74.3 B.1.c		
63 Sub. EE	**FOR COATING OPERATIONS** • 95% overall HAP control efficiency .... 703(c)(1) **OR:** • Incinerators – 95% overall HAP control or 20 ppmv (by compound) if 100% capture efficiency .... 703(c)(2) Can vent enclosure or room air to control device to meet (c)(1) or (c)(2) .... 703(c)(3)	Initial: performance test .... 705(a), 705(c)(4)(ii) Ongoing: Operating parameter .... 704(b) **IF**: carbon adsorption .... **AND**: common exhaust stack for all of the carbon vessels .... **THEN**: compliance basis = avg. control efficiency or avg. outlet conc. over 3 consecutive adsorption cycles .... 704(c)(3)(ii) **IF**: carbon adsorption .... **AND**: separate stack for each carbon vessel .... **THEN**: compliance basis = avg. control efficiency or avg. outlet conc. 3-day rolling average of daily calculations .... 704(c)(3)(iii) **IF:** control device except carbon .... **THEN:** compliance basis = 3-hr avg. of OP .... 704(c)(3)(iv), 704(c)(5), (6) **IF:** capture device, including total enclosure: **THEN:** 3-hr avg. of OP .... 704(c)(7), 704(c)(3)(iv) Requirements apply during periods of startup and shutdown, and whenever magnetic tape manufacturing operations are taking place .... 701(f), 705(i)	Meet criteria for total enclosure .... 705(c)(4)(i) **AND** Performance test for control device efficiency .... 705(c)(4)(ii) CEMS, CMS, or surrogate for ongoing demonstration of control device efficiency or emission rate .... 705(c) **IF:** 703(c) ... **AND:** Hard piping or ductwork from HAP source to the control device **THEN:** • Demonstrate by inspection that vented to a control device • Demonstrated to meet 703(c) .... 705(d)(1) **IF:** multiple emission points vented to one common control device ... **THEN:** only one performance test is required to demonstrate initial compliance for that group of emission points .... 705(a) **IF:** thermal oxidizer ... **AND:** OP = min combustion temp **THEN:** set OP value during the initial performance test .... 704(b)(3) **IF:** catalytic oxidizer .... **AND:** OP = min gas ΔT across the catalyst bed **THEN:** set OP value during the initial performance test .... 704(b)(4)
Project XLFPA	VOC PAL: 150 tpy.... FPA II A.1.a 95% control of VOC and HAP.... FPA II A.2.c	VOC PAL: 12-mo. basis, rolled monthly.... FPA II A.1.a VOC and HAP control efficiency: 72-hr. rolling average .... FPA II A.2.c SRU operating at all times solvent operations within the enclosure .... FPA II A.2.c	Ongoing compliance demonstration: 95% control efficiency – FID-CEMS .... FPA II A.3.b Ongoing compliance demonstration: VOC PAL .... FPA II A.3.a: • FID-CEMS and flow measurement-CMS • VOC from other sources – recordkeeping and/or source testing per Title V permit
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 4 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS – COATING MIX PREP. EQUIPMENT

Streamlining Conclusion →

40 CFR 63 Subpart EE -- Combines most stringent control requirement of 95% with work practices for covers

Less Stringent:
VCAPCD Rule 74.3: cover standards not required if mix emissions otherwise controlled

Equally Stringent:
60 Sub VVV: equally stringent, but only if there is concurrent construction of a control device
60 Sub SSS: equally stringent, but only if concurrent construction of new VOC control device (other than a condenser)

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
60 Sub. RR	NA	NA	NA
60 Sub. TT	NA	NA	NA
60 Sub. SSS	**FOR NEW SOURCES** **IF:** Concurrent construction of a new VOC control device (other than condenser) ... **THEN:** • Cover on each piece of equipment and vented to a 95 % efficient control device 712(c) • Cover specifications .... 712(c) (1) to (5) **FOR NEW/ MODIFIED/ RECONSTRUCTED SOURCES** **IF:** "affected" coating mix prep equipment ... **AND**: not subject to 712(c) **THEN:** Cover only ... 712(d)(1) **OR:** Cover and vent to control device .... 712(d)(2)	NA	**FOR NEW SOURCES** • Cover specifications; • Cover op. Procedures; **AND** • Vent mix equip. to control device demonstrated at ≥95% during coating compliance demonstration .... 713(b)(6) **FOR NEW/ MODIFIED/ RECONSTRUCTED SOURCES** **IF:** Cover only **THEN:** • Cover specifications; and • Cover op. Procedures .... 713(b)(8) **IF:** Cover and vent to control ... **THEN:** • Cover specifications; • Cover op. Procedures; and • Vent mix equip. to control device (verification by inspection only – no testing) .... 713(b)(7)
60 Sub. VVV	**IF:** Concurrent construction of a control device **AND** use ≥ 130 Mg of VOC per 12-mo ... **THEN**: **WORK PRACTICE** • cover on each piece of affected coating mix preparation equipment .... 742(c)(1) • Cover specs; .... 743(c)(1) **AND** • Posted procedures .... 743(c)(2) **AND:** **EMISSION LIMIT** vent from the covered mix equipment to a 95 % control device while prep. of the coating is taking place within the vessel .... 742(c)(1) **IF:** No concurrent construction of a control device .... **AND** uses ≥ 130 Mg of VOC per 12-mo .... **OR IF:** Use ≥ 95 Mg of VOC per 12-mo .but < 130 Mg **THEN**:	NA	• Work Practices: by visual demonstration 743(c)(2) • Emission Control: by visual demonstration and control device demonstrated 95% when tested for control of coating 743(c)(4) By inspection .... 743(d)

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
	WORK PRACTICE • cover on each piece of affected coating mix preparation equipment ... 742(c)(2), (3) • Cover specs .... 743(d)(1) • Posted procedures .... 743(d)(2) **OR** **EMISSION LIMIT** vent from the covered mix equipment to a control device (no control efficiency specified) while prep. of the coating is taking place within the vessel .... 742(c)(2), (3)		
VCAPCD 74.3	**CONTAINERS AND MIX EQUIP.** [associated with coating material used in any application process] **IF:** Not controlled per B.1.c .... **THEN:** • no leaks • covered when in use • covers not be required when adding or removing material or during cleaning operations 74.3 B.2	NA	NA
63 Sub. EE	95% overall HAP control efficiency **OR** Incinerators – 20 ppmv (by compound) if 100% capture efficiency .... 703(c)(1), (2) Can vent enclosure or room air to control device to meet (c)(1) or (c)(2) .... 703(c)(3) **IF:** control device **NOT** incinerator **AND:** coating operations **NOT** occurring **THEN:** • can apply alternate outlet concentration • value established from performance test or CEM .... 703(i), 704(b)(11)(ii) **WORK PRACTICE:** Covers closed all times except (if necessary): • adding ingredients • withdrawing samples • transferring contents, or • making visual inspection Ports of min. practical size .... 704(d)(2)	**Initial:** performance test .... 705(a) **Ongoing:** See compliance basis/compliance demonstration requirements for coating equipment in Table 3 Requirements apply during periods of startup and shutdown, and whenever magnetic tape manufacturing operations are taking place .... 701(f), 705(i)	See compliance basis/compliance demonstration requirements for coating equipment in Table 3
Project XL FPA	NA	NA	NA
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 5 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS –WASTE HANDLING DEVICE, CONDENSER VENT IN SOLVENT RECOVERY

Streamlining Conclusion →	40 CFR 63 Subpart EE Other Rules: no other rules of this streamlining analysis address this subject

How Addressed in ↓	**EMISSIONS LIMIT**	**COMPLIANCE BASIS**	**COMPLIANCE DEMONSTRATION**
60 Sub. RR	NA	NA	NA
60 Sub. TT	NA	NA	NA
60 Sub. SSS	NA	NA	NA
60 Sub. VVV	NA	NA	NA
VCAPCD 74.3	NA	NA	NA
63 Sub. EE	95% overall HAP control efficiency **OR** Incinerators – 20 ppmv (by compound) if 100% capture efficiency .... 703(c)(1), (2) Can vent enclosure or room air to control device to meet (c)(1) or (c)(2) .... 703(c)(3) **IF:** control device **NOT** incinerator **AND:** coating operations **NOT** occurring **THEN:** • can apply alternate outlet concentration • value established from performance test or CEM .... 703(i), 704(b)(11)(ii)	**Initial**: performance test ….705(a) **Ongoing**: See compliance basis/compliance demonstration requirements for coating equipment in Table 3 Requirements apply during periods of startup and shutdown, and whenever magnetic tape manufacturing operations are taking place .... 701(f), 705(i)	See compliance basis/compliance demonstration requirements for coating equipment in Table 3
Project XL FPA	NA	NA	NA
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 6 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS – SOLVENT STORAGE TANK

Streamlining Conclusion →

- 40 CFR 63 Subpart EE – all below-listed items
- VCAPCD 71.2 B.2, C.3 (In lieu of 95% control can have a pressure tank with pressure-vacuum relief valve with min. pressure and vacuum settings of 90 % of the max. safe pressure and vacuum ratings of the container)

Equally Stringent:
VCAPCD Rule 71.2: equally stringent, including for the following, which are no more stringent than what is required under 40 CFR 63.6(e)(1)(i) (*At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.*):

71.2. C.3.a IF: tank gauging or sampling device on a tank vented to the vapor recovery system, **THEN:** leak-free cover -- closed at all times except during gauging or sampling

71.2. C.3.b Piping, valves and fittings -- designed/ constructed, maintained/operated to be leak-free

Less Stringent:
60 Sub Kb: 40 CFR 63.113b(c)(1) and (2) – are exceeded by the compliance demonstration and related requirements that apply under 40 CFR 63 Subpart EE and/or through 40 CFR 63 Subpart A.

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
60 Sub. RR	NA	NA	NA
60 Sub. TT	NA	NA	NA
60 Sub. SSS	NA	NA	NA
60 Sub. VVV	NA	NA	NA
VCAPCD 74.3	NA	NA	NA
63 Sub. EE	95% overall HAP control efficiency **OR** Incinerators – 20 ppmv (by compound) if 100% capture efficiency .... 703(c)(1), (2) **IF:** control device **NOT** incinerator **AND:** coating operations **NOT** occurring **THEN:** • can apply alternate outlet concentration • value established from performance test or CEM .... 703(i), 704(b)(11)(ii)	Initial: performance test ....705(a) Ongoing: See "COATING"	See "COATING"
Project XL FPA	NA	NA	NA
60 Sub. Kb	**IF:** V ≥151 m^3 (39,900 gal) .... **AND:** 5.2 (0.75 psi) ≤ VP < 76.6 kPa (11.1 psi) **OR** **IF:** 75 m^3 (19,800 gal) ≥ V <151 m^3 (39,900 gal) .... **AND** 27.6 (4.0 psi) ≤ VP < 76.6 kPa (11.1 psi) **OR** **IF:** V ≥75 m3 (19,800 gal) .... **AND:** V.P ≥76.6 kPa (11.1 psi) **THEN:** 112b(a)(3), 112b(b)(1) • Closed vent system with 95% control device • No detectable emissions (< 500 ppm instrument reading with Reference Method 21) and visual inspections **OR:** an equivalent system .... 112b(a)(4), 112b(b)(2) **IF:** 40 m3 (10,500 gal) ≤ V < 75 m3	Operate according to approved Operating Plan .... 113b(c)(2)	Exempt from 40 CFR 60.8 .... 113b(c) Submit Operating Plan with notification under [113b(c)(1)] • 40 CFR 60.7(a)(1) .... (notification of commence construction within 30 days), or • 40 CFR 60.7(a)(2) .... (30 to 60 day prior notification of anticipated date of actual startup) Content of Operating Plan: 113b(c)(1)(i), (ii) • Documentation demonstrating that control device will achieve the required control efficiency during max loading • Identification and rationale for an operating parameter • **IF:** the control device or the closed vent capture system receives inputs from sources other than the affected source

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
	(19,800 gal) .... **THEN:** only requirements under Subpart Kb: • Records showing dimensions of the tank • Analysis showing the capacity of the tank .... 116b(b)		**THEN:** efficiency demonstration to include all vapors, gases, and liquids received by the closed vent capture system and control device • **IF:** enclosed combustion device with ≥ 0.75 seconds and ≥ 816°C to meet the 95 % requirement **THEN:** documentation that those conditions will exist is sufficient
VCAPCD 71.2	**IF:** tank V ≤ 40,000 gal ... **AND:** ROC liquid **THEN:** B.1, C.3 • submerged fill pipe, **OR** .... • 95% efficient vapor loss control device **IF:** tank 10,000 ≤ V < 20,000 gal .... **AND:** ROC liquid VP ≥ 1.5 psia .... **THEN:** B.2, C.3 • Pressure-vacuum relief valve with min. pressure and vacuum settings of 90 % of the max. safe pressure and vacuum ratings of the container. **OR** • 95% efficient vapor loss control device **IF:** tank 20,000 ≤ V < 40,000 gal .... **AND:** ROC liquid VP ≥ 1.5 psia .... **THEN:** 95% efficient vapor loss control device.... B.3, C.3 **IF:** tank V > 40,000 gal .... **AND:** ROC liquid VP ≥ 0.5 psia **THEN:** 95% efficient vapor loss control device.... B.4, C.3 **IF:** tank V > 40,000 gal .... **AND:** ROC liquid VP ≥ 11 psia **THEN:** • Pressure tank, **OR ....** • 95% efficient vapor loss control device.... B.4, C.3 **IF:** tank gauging or sampling device on a tank vented to the vapor recovery system **THEN:** leak-free cover -- closed at all times except during gauging or sampling .... C.3.a **Piping, valves and fittings** -- designed/ constructed, maintained/operated to be leak-free .... C.3.b **IF:** pressure vacuum valves **THEN:** set to within 10 % of the max allowable working pressure of the tank C.3.c	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 7 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS – PM TRANSFER OPERATIONS

Streamlining Conclusion →

40 CFR 63 Subpart EE

Less or Equally Stringent Other Rules:
VCAPCD Rule 52 and 53: both set forth allowable emissions from sources that emit particulate matter. With Subpart EE of 40 CFR 63, however, no visible emissions are permissible, as compared with 20% opacity being allowed under VCAPCD Rule 52 and 53.

How Addressed in ↓	EMISSIONS LIMIT	COMPLIANCE BASIS	COMPLIANCE DEMONSTRATION
60 Sub. RR	NA	NA	NA
60 Sub. TT	NA	NA	NA
60 Sub. SSS	NA	NA	NA
60 Sub. VVV	NA	NA	NA
VCAPCD 74.3	NA	NA	NA
63 Sub. EE	Enclosed transfer method .... 703(d)(1) **OR** hood or enclosure to a baghouse or fabric filter that exhibits no visible emissions .... 703(d)(2)	**For 703(d)(2):** Initial: performance test .... 705(a) Ongoing: occurrence of visible emissions **OR** 3-hr avg of OP .... 704(e) Requirements apply during periods of startup and shutdown, and whenever magnetic tape manufacturing operations are taking place .... 701(f), 705(i)	• Use of enclosed system, **OR** • emissions test and eng'r. design calculations .... 705(g)), 705(a) **IF:** multiple emission points vented to one common control device ... **THEN:** only one performance test is required to demonstrate initial compliance for that group of emission points .... 705(a)
Project XL FPA	NA	NA	NA
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	Allowable concentration versus air flow of discharge	NA	NA
VCAPCD 53	Allowable mass discharge (lb/hr) versus process weight rate (lb/hr)	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 8 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS – WASH SINKS

Streamlining Conclusion →	40 CFR 63 Subpart EE Other Rules: no other rules of this streamlining analysis address this subject

How Addressed in ↓	**EMISSIONS LIMIT**	**COMPLIANCE BASIS**	**COMPLIANCE DEMONSTRATION**
60 Sub. RR	NA	NA	NA
60 Sub. TT	NA	NA	NA
60 Sub. SSS	NA	NA	NA
60 Sub. VVV	NA	NA	NA
VCAPCD 74.3	NA	NA	NA
63 Sub. EE	HAP control efficiency ≥ 88 % (can vent through room) .... 703(e)(1)(i), (e)(2) **OR** freeboard ratio ≥ 75 %, all times when the sink contains HAP .... 703(e)(1)(ii) **IF:** 703(e)(1)(i) **AND:** control device **NOT** incinerator **AND:** coating operations not occurring **THEN:** • can apply alternate outlet concentration • value established from performance test or CEM .... 703(i), 704(b)(11)(ii)	Initial: performance test .... 705(a) Ongoing: See "Coating"	• Demonstration of freeboard, **OR** • Emissions test on connected control device -- See "Coating" .... 705(e), 705(a)
Project XL FPA	NA	NA	NA
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 9 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS – FLUSHING FIXED LINES

Streamlining Conclusion →	40 CFR 63 Subpart EE Other Rules: no other rules of this streamlining analysis address this subject

How Addressed in ↓	**EMISSIONS LIMIT**	**COMPLIANCE BASIS**	**COMPLIANCE DEMONSTRATION**
60 Sub. RR	NA	NA	NA
60 Sub. TT	NA	NA	NA
60 Sub. SSS	NA	NA	NA
60 Sub. VVV	NA	NA	NA
VCAPCD 74.3	NA	NA	NA
63 Sub. EE	HAP control ≥95 % (can vent through room) .... 703(f)(1)(ii), (f)(2) **OR** Closed system for flushing fixed lines .... 703(f)(1)(ii) **IF:** 703(e)(1)(i) **AND:** control device **NOT** incinerator **AND:** coating operations **NOT** occurring .... **THEN:** • can apply alternate outlet concentration • value established from performance test or CEM .... 703(i), 704(b)(11)(ii)	Initial: performance test .... 705(a) Ongoing: See "Coating"	Use of closed system, **OR** Emissions test on connected control device -- See "Coating" .... 705(f)), 705(a)
Project XL FPA	NA	NA	NA
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 10 – STREAMLINING ANALYSIS
SUBJECT: STANDARD FOR VOCS AND/OR HAPS – OTHER EQUIPMENT/OPERATIONS

	CLEAN-UP SOLVENTS	ENCLOSURES
Streamlining Conclusion →	40 CFR 63 Subpart EE -- 95% control Less Stringent: **VCAPCD Rule 74.3:** allows no control of cleanup solvents of less than specified VOC density **VCAPCD Rule 74.6.1:** allows 85% control in combination with work practices and equipment standards	40 CFR 63 Subpart EE -- Specific design criteria ror openings, face velocity, etc. Less Stringent: **60 Sub RR:** open criteria Equally Stringent: **60 Sub VVV:** same criteria as Part 63 Sub EE **60 Sub SSS:** same criteria as Part 63 Sub EE **VCAPCD:** references 60 Sub SSS **FPA:** Method 204 is identical to 63 Sub EE
How Addressed in ↓		
60 Sub. RR	NA	No criteria "...the Administrator is satisfied that the enclosure is totally capturing fugitive VOC emissions" .... 444(c)(4)(ii)
60 Sub. TT	NA	
60 Sub. SSS	NA	Enclosure design criteria .... 713(b)(5)(i)
60 Sub. VVV	NA	Enclosure design criteria .... 743(b)
VCAPCD 74.3	Solvent < 200 g ROC/L of material used; **OR:** ROC emissions from clean-up operations: < 120 g/L of clean-up solvent used, per B.1.b, **OR:** Collected and reduced per B.1.c. 74.3 B.3	Criteria of Part 60, Subpart SSS, Magnetic Tape Manufacturing Industry NSPS, of 10/3/88 .... 74.3.E.3
63 Sub. EE	Implied part of Affected Source and thus subject to 95% control	Total enclosure design criteria .... 705(c)(4)(i)
Project XL FPA	NA	Total enclosure – criteria for demonstration – 40 CFR 51 Appendix M Method 204 ..... FPA II A.2.a
60 Sub. Kb	NA	NA
VCAPCD 71.2	NA	NA
VCAPCD 52	NA	NA
VCAPCD 53	NA	NA
VCAPCD 74.6.1	Equipment standards and/or control device that is overall 85% efficient **AND:** Work practices	NA

TABLE 11 – STREAMLINING ANALYSIS
SUBJECT: MONITORING – GENERAL PROVISIONS AND ENCLOSURES

	GENERAL	ENCLOSURES
Streamlining Conclusion →	40 CFR 63 Subpart EE Other Rules: All are equally or less stringent – each sets forth broad basis for monitoring, with Subpart EE of Part 63 generally being the most prescriptive, especially with respect to direct measurement of emissions	40 CFR 63 Subpart EE – operating parameter and instrumentation Less Stringent: **60 Sub RR:** run-status indicator only **60 Sub TT:** not addressed **VCAPCD 74.3:** not addressed Equally Stringent: **60 Sub SSS:** functionally identical to Part 63 Subpart EE **60 Sub VVV:** functionally identical to Part 63 Subpart EE
How Addressed in ↓		
60 Sub. RR	Calendar month record of all coatings used and VOC content of each .... 445(a)	**IF:** solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions.... **THEN**: • install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. • No continuous monitor required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system .... 445(g)
60 Sub. TT	NA	NA
60 Sub. SSS	Monitoring devices to be installed and calibrated • according to the manufacturer's specifications • in locations to provide representative values 714	**IF:** Total enclosure or capture system **OR** Total enclosure per § 60.713(b)(5) **AND:** demonstrating compliance pursuant to § 60.713(b)(2), (3), or (4) .... **THEN:** • Submit a **monitoring plan** for the VOC capture system to the Administrator with the notification of anticipated startup per § 60.7(a)(2) • Identify the parameter to be monitored as an indicator of VOC capture system performance and method for monitoring. • install, calibrate, maintain, and operate, according to the manuf's specs, a **monitoring device** that continuously indicates and records the value of the chosen parameter .... 714(g)
60 Sub. VVV	• Install and calibrate monitoring devices according to manufacturer's specs, • install prior to the initial performance test • locations such that representative values of the monitored parameters will be obtained. • Continuously measure and record during each performance test .... 744(a) **IF:** Use < 95 MG VOC per year ... **OR:** 742(c)(3) [Use ≥ 95 Mg of VOC per 12-mo .but < 130 Mg] .... **THEN:** semiannual estimates of the projected annual amount of VOC to be used .... 744(b)	**IF:** Capture system (total enclosure or otherwise) **THEN:** ... • Submit monitoring plan for vapor capture system for approval with the notification of anticipated startup required under §60.7(a)(2) • Plan to identify the parameter to be monitored as an indicator of vapor capture system performance and method for monitoring the chosen parameter. • Install, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the value of the chosen parameter .... 744(g), (h)
VCAPCD 74.3	NA	NA
63 Sub. EE	**IF:** multiple emission points to common control device.. **THEN:** monitor common control device only .... 704(c)(2)(iii)	**IF:** vent solvent HAP emissions from a source through a room, enclosure, or hood, to a control device

How Addressed in ↓	GENERAL	ENCLOSURES
	IF: OP under 704(b)(1), (2), (3), (4), (5), (6), or (7) .... **THEN:** establish OP as the arithmetic avg. of parameter values monitored during the multiple test runs per 705(b)(2) and (b)(1), or during the multiple runs of other tests conducted per 704(b)(11) used to demonstrate compliance against § 63.703(c), (d), (e), (f) or (i) .... 704(b)(8) Can establish multiple operating parameter values representing different operating conditions .... 704(b)(11)(i) **IF:** add-on air control device .... **EXCEPT:** as allowed by 704(b)(2), (3), (4), (5), or (9) **THEN:** Site-specific OP = • outlet total HAP or VOC concentration... **OR:** • control device efficiency .... 704(b)(1)(i), (ii) **IF:** OP = control device efficiency **THEN:** CEM to measure continuously the total HAP or VOC concentration at both the inlet and the outlet .... 704(c)(3)(i)(A) **IF:** OP = control device outlet concentration **THEN:** CEM to measure continuously the total HAP or VOC concentration at outlet .... 704(c)(3)(i)(B) **IF:** CEM **THEN:** • PS 8 or 9 of part 60, appendix B, as appropriate, • Appendix F of part 60 • Appendix F quarterly audits -- must challenge the monitors with compounds representative of the gaseous emission stream being controlled .... 704(c)(2)(i)	**AND:** 703(c), (e)(1)(i), (f)(1)(i), or (i) .... **THEN:** Submit with compliance status report of §63.9(h) a plan: • Identifies the OP to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained; • Discusses rationale for OP; and • Identifies the specific monitoring procedures; • Set value(s) for OP • Monitor according to the plan • Install, calibrate, operate, and maintain the instrumentation to measure continuously the site-specific OP .... 704(b)(6), (c)(7)
Project XL FPA	NA	NA
60 Sub. Kb	• Records showing dimensions of the tank • Analysis showing the capacity of the tank • Record retention: life of the tank [116b(a)] Determination of vapor pressure if: • Known composition .... 116b(e) • Unknown composition .... 116b(f)	NA
VCAPCD 71.2	NA	NA
VCAPCD 52	NA	NA
VCAPCD 53	NA	NA
VCAPCD 74.6.1	NA	NA

TABLE 12 – STREAMLINING ANALYSIS
SUBJECT: MONITORING – THERMAL OXIDIZERS, CATALYTIC OXIDIZERS, AND SOLVENT RECOVERY UNITS

	THERMAL OXIDIZERS	CATALYTIC OXIDIZER	SOLVENT RECOVERY
Streamlining Conclusion →	40 CFR 63 Subpart EE -- continuous thermocouple measurement of combustion temperature; standard industry practice precision Less Stringent: **VCAPCD 74.3:** not addressed Equally Stringent: **60 Sub RR:** similar to Part 63 Subpart EE with direct specification on accuracy of measurements **60 Sub TT:** similar to Part 63 Subpart EE with direct specification on accuracy of measurements **60 Sub SSS:** similar to Part 63 Subpart EE with direct specification on accuracy of measurements **60 Sub VVV:** similar to Part 63 Subpart EE with direct specification on accuracy of measurements	40 CFR 63 Subpart EE – continuous thermocouple measurement of upstream and/or upstream/ downstream temperature; standard industry practice precision Less Stringent: **VCAPCD 74.3:** not addressed Equally Stringent: **60 Sub RR:** functionally identical to Part 63 Subpart EE **60 Sub TT:** similar to Part 63 Subpart EE with direct specification on accuracy of measurements **60 Sub SSS:** similar to Part 63 Subpart EE with direct specification on accuracy of measurements **60 Sub VVV:** similar to Part 63 Subpart EE with direct specification on accuracy of measurements	40 CFR 63 Subpart EE – continuous monitoring of outlet concentration of control device, or inlet/outlet concentration of control device Less Stringent: **60 Sub RR:** material balance **60 Sub TT:** not addressed **VCAPCD 74.3:** not addressed Equally Stringent: **60 Sub SSS:** functionally identical to Part 63 Subpart EE **60 Sub VVV:** functionally identical to Part 63 Subpart EE
How Addressed in ↓			
60 Sub. RR	**IF:** 442(a)(2) **AND** thermal oxidizer .... **THEN**: • install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. • accuracy ±0.75 % of temp. (°C) being measured or ±2.5°C, whichever greater • continuously record the destruction device combustion temperature during coating operations .... 443(e), 445(e)	**IF:** 442(a)(2) **AND** catalytic oxidizer .... **THEN**: • install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed. • gas temperature upstream and downstream of the incinerator catalyst bed during coating operations .... 443(e), 445(f)	• Calendar month record of amount of solvent applied in the coating at each affected facility .... 445(b) • install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of solvent recovered by the device over a calendar month period. • device accurate within ±2.0% • calendar month record of the amount of solvent recovered by the device .... 445(c)
60 Sub. TT	• Continuous monitor of combustion temperature • Accuracy: ±2.5°C. or ±0.75 % of the temp. being measured, whichever greater .... 464(c)	• Continuous monitor of the gas temperature upstream and downstream of the catalyst bed. • Accuracy: ±2.5°C. or ±0.75 % of the temp. being measured, whichever greater .... 464(c)	NA
60 Sub. SSS	**IF:** Thermal oxidizer .... **AND:** compliance demonstration by 60.713(b)(2), (4), (5), or (6) ... **THEN:** • install, calibrate, maintain, and operate, according to the manufacturer's specifications, a **combustion temperature** CEM	**IF:** Catalytic oxidizer **AND**: compliance demonstration by §60.713(b)(2), (4), (5), or (6) **THEN:** • install, calibrate, maintain, and operate, according to the manufacturer's specifications CEM for gas **temperature** both upstream and downstream of the	**IF:** common exhaust stack for all adsorber vessels **THEN**: monitoring device to continuously measure concentration in exhaust of control device or exhaust and inlet of control device .... 714(c)(1) **IF:** individual exhaust stack for each adsorber vessels **THEN**: monitoring device to continuously measure concentration in exhaust of control for minimum of one

How Addressed in ↓	THERMAL OXIDIZERS	CATALYTIC OXIDIZER	SOLVENT RECOVERY
	• accuracy within ± 1 % of the temperature being measured in Celsius degrees .... 714(e)	catalyst bed • accuracy within ±1 % of the temperature being measured in Celsius degrees .... 714(f)	complete adsorption cycle per day .... 714(c)(2) Monitors installed, calibrated, maintained, operated according to manufacturer's specifications ... 714(c)
60 Sub. VVV	**IF:** thermal oxidizer **AND** compliance demonstration by §60.743(a)(1), (2), (b), or (c) **THEN:** • Continuous measure and record of combustion temperature • Accuracy within ±1 percent of the temperature being measured in Celsius degrees ..... 744(e)	**IF:** catalytic oxidizer **AND** compliance demonstration by §60.743 (a)(1), (2), (b), or (c) **THEN:** • Continuous measure and record of temperature upstream and downstream of the catalyst bed. • Accuracy within ±1 percent of the temperature being measured in Celsius degrees .... 744(f)	**IF:** carbon adsorption **AND:** compliance demonstration by 743(a)(1), (2), (b), or (c) or by 743(a)(4) .... **AND:** common exhaust stack for all individual adsorber vessels .. • **AND**: % increase in VOC concentration is used as the basis for reporting per §60.747(d)(1)(i) .... **THEN**: continuous measure/record of VOC concentration in outlet gas stream. • **AND**: % control device efficiency is used as the basis for reporting per §60.747(d)(2)(i) .... **THEN**: continuous measure/record of VOC concentration in inlet and outlet gas streams .... 744(c)(1)
VCAPCD 74.3	NA	NA	NA
63 Sub. EE	**IF:** thermal oxidizer .... **THEN:** alternate OP = min. combustion temperature 704(b)(3) Install, calibrate, operate, and maintain a thermocouple to measure continuously the combustion temperature whenever HAP from magnetic tape manufacturing operations are vented to the control device .... 704(c)(5) • According to manuf. specs • Calibrate or replace every 3 mo. .... 704(c)(2)(ii)	**IF:** catalytic oxidizer .... **THEN:** OP = • min. gas temperature upstream of the catalyst bed, **OR** • min gas ΔT across the catalyst bed .... 704(b)(4) Install, calibrate, operate, and maintain a thermocouple to measure continuously the gas temperature both upstream and downstream of the catalyst bed whenever HAP from magnetic tape manufacturing operations are vented to the control device 704(c)(6) • According to manuf. Specs • Calibrate or replace every 3 mo. .... 704(c)(2)(ii)	• CEMS for outlet total HAP or VOC concentration OR • CEMS for control device efficiency .... 704(b)(1), 705(3)(A), (B) • PS8 or PS 9 of 40 CFR 60 Appendix B.... 704(c)(1)(i) • Appendix F or 40 CFR Part 60.... 704(c)(1)(i)
Project XL FPA	NA	NA	NA
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA

TABLE 13 – STREAMLINING ANALYSIS
SUBJECT: MONITORING – BAGHOUSE/FABRIC FILTERS, WASTEWATER, AND BYPASS VENTS

	BAGHOUSE OR FABRIC FILTER	WASTEWATER FROM STEAM STRIPPING OF CARBON	BYPASS VENTS
Streamlining Conclusion →	40 CFR 63 Subpart EE Less Stringent Other Rules: do not address the subject	40 CFR 63 Subpart EE Less Stringent Other Rules: do not address the subject	40 CFR 63 Subpart EE Less Stringent Other Rules: do not address the subject
How Addressed in ↓			
60 Sub. RR	NA	NA	NA
60 Sub. TT	NA	NA	NA
60 Sub. SSS	NA	NA	NA
60 Sub. VVV	NA	NA	NA
VCAPCD 74.3	NA	NA	NA
63 Sub. EE	• Min ventilation air flow rate through the inlet duct to the baghouse or fabric filter • Value to be supported by the engineering calculations that are considered part of the initial performance test .... 704(b)(7) • Visible emission testing each day that particulate HAP transfer occurs • Install, calibrate, and operate instrumentation to continuously monitor the vent. air flow rate in the inlet duct to the baghouse or fabric filter whenever PM HAP transfer occurs .... 704(e)	OP = < 50 ppmw VOHAP .... 704(b)(10)(ii)(B), 704(d)(2)	**IF:** bypass vents (not including equip. such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes) **THEN:** • Flow indicator that provides a record of vent stream flow at least once every 15 minutes • Secure any bypass line valve in the closed position; monthly visual inspection • Continuous monitoring of valve position; monthly inspection • Automatic shutdown system of process; monthly inspection .... 704(c)(10)
Project XL FPA	NA	NA	NA
60 Sub. Kb	NA	NA	NA
VCAPCD 71.2	NA	NA	NA
VCAPCD 52	NA	NA	NA
VCAPCD 53	NA	NA	NA
VCAPCD 74.6.1	NA	NA	NA