

NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS  
PAPER AND OTHER WEB COATING  
40 CFR Part 63, Subpart JJJJ

**EXAMPLE** Inspection Checklist

August 2004

**Disclaimer**

This **EXAMPLE** checklist is not intended, nor can it be relied on, to create any rights enforceable by any party in litigation with the United States. EPA, State and Local officials, or facility personnel may decide to follow this checklist or to act at variance with it, based on analysis of specific site circumstances. This checklist may be revised without public notice to reflect changes in EPA's policy. The most current version will be posted on the Paper and Other Web (POWC) website. The address is: <http://www.epa.gov/ttn/uatw/powc/powcpg.html>.

This **EXAMPLE** checklist may serve as a useful tool for agencies and sources tasked to implement the rule. However, since the checklists does not contain all the details of the NESHAP, the rule itself and any amendments should be referred to when performing facility inspections.

In addition, certain records and reports that might need to be reviewed prior to the onsite inspection are not addressed in this checklist. Also not included are requirements under the General Provisions. Please refer to Table 1 of the POWC NESHAP for overlapping provisions with 40 CFR part 63 subpart A (General Provisions). You may find information about the General provisions posted on the General Provisions website. The address is: <http://www.epa.gov/ttn/atw/gp/gppg.html>.

Please be aware that a best effort was made to make this as accurate as possible, however, in the event that there are typing errors or deviations from the final POWC MACT rule, the final rule or any amendments to the final rule takes precedent over this checklist.

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**Credits:** This document was made possible through the efforts of the POWC Implementation Tool Development Partnership effort, an effort to bring together the regulated and regulatory community. It was through a group effort that this document was developed. The logo of the partner who was the lead for this tool is listed first below. To see a description of our partners or to get more information about the partnership effort, see <http://www.epa.gov/ttn/atw/powc/powcpg.html>



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**EXAMPLE** Inspection Checklist  
**General Information**

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NOTE: This checklist will establish whether a Facility or operations within a Facility are subject to and are in compliance with this Subpart.

I. GENERAL INFORMATION

A. Date of Inspection: \_\_\_\_\_

B. Facility Name: \_\_\_\_\_

C. Facility Address \_\_\_\_\_  
\_\_\_\_\_

D. Facility Contact: \_\_\_\_\_  
(Name, Title and Phone)

\_\_\_\_\_  
\_\_\_\_\_

E. Inspector(s)  
Name

Title/Affiliation

Phone Number

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**EXAMPLE** Inspection Checklist  
**Source Identification**

II. SOURCE IDENTIFICATION

- A. Is the Facility a major source of HAPs? Yes  No   
 If no, has the Facility maintained records of this determination onsite for 5 years? [' 63.10(b)(3)] Yes  No   
**If no, do not proceed - this rule applies only to major sources of HAP. [' 63.3290]**
- B. Does this Facility engage in the coating of paper, plastic film, metallic foil or any other web surfaces? Yes  No   
**If no, do not proceed, this rule does not apply. [' 63.3290]**
- C. Is the Facility a new source? Yes  No   
 (New sources are constructed or reconstructed after 9/13/00. NOTE: Adding a new coating line to an existing Facility does not constitute a new source.)  
 (Both new and existing sources are required to comply with this subpart. [' 63.3290])
- D. Exempt Operations Yes  No   
 Has the Facility maintained records of the following information for 5 years?

*The following operations are exempt based on the regulatory NESHAP provisions shown in the table. If you answer "NO" to any of the remaining questions in this Section II, do not proceed, this rule does not apply.*

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3300(a)	Are any web coating lines stand-alone coating equipment subject to the NESHAP for Printing and Publishing, Subpart KK? If yes, identify which lines are subject to Subpart KK.			

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Source Identification  
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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3300(b)	Are any web coating lines a product and packaging rotogravure or wide-web flexographic press subject to the NESHAP for Printing and Publishing, Subpart KK? If yes, identify which lines are subject to Subpart KK.			
' 63.3300(c)	Are any of the following processes done in the Facility: lithography, screenprinting, letterpress, and narrow-web flexographic printing processes? If yes, identify which lines conduct which processes.			
' 63.3300(d)	Are any web coating lines subject to the NESHAP for Magnetic Tape Manufacturing Operations, Subpart EE? If yes, identify which lines are subject to Subpart EE.			
' 63.3300(e)	Are there any web coating lines that solely coat metal strips or metal webs that: (1) are at least 0.15 millimeter (0.006 inch) thick; (2) are packaged in a roll or coil and not used in flexible packaging; and (3) that will be subject to the NESHAP for surface coating of metal coil? If yes, identify which lines will be subject to the Metal Coil NESHAP.			
' 63.3300(f)	Are there any web coating lines that will be subject to the NESHAP for the printing, coating, and dyeing of fabric and other textiles? (This excludes any line used solely to coat a fabric substrate used for pressure sensitive tape and abrasive materials.) If yes, identify which lines will be subject to the Fabric Coating NESHAP.			
' 63.3300(g)	Are any web coating lines defined as research or laboratory equipment? If yes, identify these lines.			

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**EXAMPLE Inspection Checklist  
Notification & Reporting**

**III. NOTIFICATION AND REPORTING<sup>1</sup>**

Citation	Requirement	Comments	Yes	No
<b>Initial Notification</b>				
' 63.3400(b)(1)	If an existing source, did Facility submit an initial notification by the due date of December 5, 2004?			
' 63.3400(b)(2)	If a new or reconstructed source was subject to the standard as of the December 4, 2002, promulgation date, did Facility submit an initial notification by the due date of April 3, 2003?			
	If a new or reconstructed source was not already subject to the standard as of the December 4, 2002, promulgation date, did Facility submit an initial notification no later than 120 days after becoming subject to the standard?			
' 63.3400(b)(4)	If the source is using a permit application in lieu of an initial notification, was it submitted by the same due date specified for the initial notification?			
<b>Semiannual Reports</b>				
' 63.3400(c)	First Semiannual Report was due: ----- Have semiannual compliance reports been submitted? (Due by July 31 and January 31 each year) When? Were the reports submitted on time?			
' 63.3400(c)(1)	Does each semiannual report cover the appropriate compliance period?			

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Notification & Reporting  
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Citation	Requirement	Comments	Yes	No
' 63.3400(c)(1)(v)	Does the Facility submit semiannual reports on an alternative schedule established under part 70 or part 71?			
' 63.3400(c)(2)	Does each report include all the following:			
' 63.3400(c)(2)(i)	Company name and address?			
' 63.3400(c)(2)(ii)	Statement by a responsible official with official's name, title, and signature certifying the accuracy of the content of the report?			
' 63.3400(c)(2)(iii)	Date of report and beginning and ending dates of the reporting period?			
' 63.3400(c)(2)(iv) ' 63.3400(c)(2)(v)	Detail on all deviations from emission limits or a statement that no deviations occurred during the given reporting period and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted?			
<b>Performance Tests</b>				
' 63.3400(d)	Is Facility complying with the emission standard using a control device? If no, skip to the section labeled "Notification of Compliance Status."			
	Is a performance test required for the control device? <sup>2</sup> If no, skip to the section labeled "Notification of Compliance Status."			
	Notification of Performance Test was due: ----- -			

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**EXAMPLE** Inspection Checklist  
**Notification & Reporting**  
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Citation	Requirement	Comments	Yes	No
	Has a Notification of Performance Tests been submitted? When?			
	Does the Facility have a site specific test plan? Site specific test plan was due: _____			
	In the notification and site-specific test plan, were the operating parameters to be monitored identified?			
<b>Notification of Compliance Status</b>				
' 63.3400(e)	Has the Facility submitted a Notification of Compliance Status? Notification of Compliance Status was due: _____ - When was this submitted?			
<b>Performance Test Report</b>				
' 63.3400(f)	Is a performance test report required? <sup>3</sup> If no, skip to section labeled "Startup/Shutdown/Malfunction Reports"			
	Has the performance test report been submitted? The performance test report was due: _____ When was this submitted?			
	Was the report submitted as part of the notification of compliance status, as required?			
<b>Startup/Shutdown/Malfunction Reports</b>				

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Citation	Requirement	Comments	Yes	No
' 63.3400(g)	Is a control device being used? If no, proceed to Section IV. Recordkeeping.			
	Is a separate startup, shutdown, and malfunction report unnecessary, because all required information is already included in the semiannual compliance report? If yes, proceed to Section IV. Recordkeeping.			
	Were startup, shutdown, and malfunction reports submitted that included the name, title and signature of the responsible official who is certifying the accuracy of the report?			
	Were any actions taken that were inconsistent with the Facility's startup, shutdown, and malfunction plan? If so, is the information included in the report?			
	If actions were taken that were not consistent with the Facility's startup, shutdown, and malfunction plan, was each startup, shutdown, and malfunction report submitted on time (i.e., within 2 days, with a follow-up letter within 7 days after the event)? If actions taken were consistent with the plan, report is due semiannually.			
Additional Comments:				

<sup>1</sup>See Compliance Timeline for specific schedules for submitting notifications and reports.

<sup>2</sup> If a control device is being used, a performance test is not required if: (1) the control device is equipped with

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continuous emission monitoring systems (CEMS) to determine inlet and outlet total volatile organic matter concentration and capture efficiency has been determined such that overall organic HAP control efficiency can be calculated, and the CEMS are used to demonstrate continuous compliance; (2) a waiver was granted under <sup>1</sup> 63.7(h); and (3) the control device is a solvent recovery system and the Facility is complying by means of a monthly liquid-liquid material balance.

<sup>3</sup> A performance test report is only required if Facility is using a control device to comply with the emission standard and a performance test is required.

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**EXAMPLE Inspection Checklist  
Recordkeeping**

#### IV. RECORDKEEPING

Check which Compliance Option the Facility has selected:

- Option 1: Use of “as-purchased” compliant coating materials
- Option 2: Use of “as-applied” compliant coating materials
- Option 3: Tracking total monthly organic HAP applied
- Option 4: Use of a capture system and control device
- Option 5: Use of multiple capture systems and control devices
- Option 6: Use of a combination of one or more capture and/or control devices and compliant coatings.

*Each Facility must maintain records on a monthly basis according to all of the following requirements.*

NOTE: All records must be retained for at least 5 years. At a minimum, the most recent 2 years of data must be retained on site. The remaining 3 years of data may be retained offsite. Files may be on microfilm, computer, floppy disks, magnetic tape disks, or microfiche.

The following records may be required depending on the compliance option chosen at the Facility:

Citation	Requirement	Comments	Yes	No
§63.10(b)(2)(xii)	Has Facility been granted a waiver of recordkeeping or reporting requirements?			
	If yes, any information demonstrating that the Facility is meeting these requirements			
§63.10(b)(2)(xiii)	Has Facility been granted permission to use an alternative to the relative accuracy test?			
	If yes, all emission levels relative to the criterion for obtaining permission			
§63.10(b)(2)(xiv)	All documentation supporting initial notification and notifications of compliance status			
' 63.10(b)(3)				
<b>Compliance Option 1</b>				
§63.3410(a)(1)(iii)	Has the Facility kept records on organic HAP content data for the purpose of demonstrating compliance?			

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Citation	Requirement	Comments	Yes	No
' 63.3410(a)(1)(vi)	Has the Facility kept records on material usage, organic HAP usage, volatile matter usage, and coating solids usage, for the purpose of making compliance demonstrations?			
<b>Compliance Option 2</b>				
' 63.3410(a)(1)(iii)	Has the Facility kept records on organic HAP content data for the purpose of demonstrating compliance?			
' 63.3410(a)(1)(iv)	Has the Facility kept records on volatile matter and coating solids content data for the purpose of demonstrating compliance?			
' 63.3410(a)(1)(vi)	Has the Facility kept records on material usage, organic HAP usage, volatile matter usage, and coating solids usage, for the purpose of making compliance demonstrations?			
<b>Compliance Option 3</b>				
' 63.3410(a)(1)(vi)	Has the Facility kept records on material usage, organic HAP usage, volatile matter usage, and coating solids usage, for the purpose of making compliance demonstrations?			
<b>Compliance Options 4, 5, and 6</b>				
63.10(b)(2)(i)	The occurrence and duration of each startup, shutdown, or malfunction (SSM) of operation			
§63.10(b)(2)(ii)	The occurrence and duration of each malfunction of the required air pollution control and monitoring equipment (if applicable)			
§63.10(b)(2)(iii)	All required maintenance performed on air pollution control and monitoring equipment (if applicable)			

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**EXAMPLE Inspection Checklist  
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Citation	Requirement	Comments	Yes	No
§63.10(b)(2)(iv)	Actions taken during periods of SSM (including corrective actions) when actions are different from the procedures specified in the SSM plan			
§63.10(b)(2)(v)	Information necessary to demonstrate conformance with the SSM plan when actions taken are consistent with the plan			
§63.10(b)(2)(vi)	Each period during which a CMS is malfunctioning or inoperative			
§63.10(b)(2)(viii)	All results of performance tests, CMS performance evaluations, and opacity and visible emission operations (as applicable)			
§63.10(b)(2)(ix)	All measurements necessary to determine the conditions of performance tests and performance evaluations			
§63.10(b)(2)(x)	All CMS calibration checks			
§63.10(b)(2)(xi)	All adjustments and maintenance performed on CMS			
' 63.3410(a)(1)(i)	Has the Facility kept records on continuous emission monitor data? NOTE: Continuous emission monitors are not required if the Facility uses a solvent recovery device and a liquid-liquid mass balance or if a performance test is conducted.			
' 63.3410(a)(1)(ii)	Has the Facility kept records on control device and capture system operating parameter data?			
' 63.3410(a)(1)(iii)	Has the Facility kept records on organic HAP content data for the purpose of demonstrating compliance?			
' 63.3410(a)(1)(iv)	Has the Facility kept records on volatile matter and coating solids content data for the purpose of demonstrating compliance?			

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**EXAMPLE Inspection Checklist  
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Citation	Requirement	Comments	Yes	No
' 63.3410(a)(1)(v)	Has the Facility kept records on the overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results?			
' 63.3410(a)(1)(vi)	Has the Facility kept records on material usage, organic HAP usage, volatile matter usage, and coating solids usage, for the purpose of making compliance demonstrations?			
Additional Comments:				

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**EXAMPLE Inspection Checklist  
Recordkeeping  
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2. For each continuous monitoring system (CMS) operated, does the Facility maintain the following records, on a monthly basis, in accordance with the requirements of ' 63.10(c)? [ ' 63.3410(a)(2)] Yes  No

Citation	Requirement	Comments	Yes	No
§63.10(c)(1)	All required CMS measurements (including monitoring data recorded during CMS breakdowns and out-of-control periods)			
' 63.10(c)(5)	Date and time identifying each period the CMS was inoperative (except for zero and high-level checks)			
' 63.10(c)(6)	Date and time identifying each period the CMS was out of control			
' 63.10(c)(7)	Date and time of commencement and completion of each period of excess emissions and parameter monitoring exceedances that occurs during SSM events			
' 63.10(c)(8)	Date and time of commencement and completion of each period of excess emissions and parameter monitoring exceedances that occurs during non - SSM events			
' 63.10(c)(10)	Nature and cause of any malfunction (if known)			
' 63.10(c)(11)	Any corrective action taken or preventive measures adopted			
' 63.10(c)(12)	The nature of repairs or adjustments to all CMS that were inoperative or out of control			
' 63.10(c)(13)	The total process operating time during the reporting period			
' 63.10(c)(14)	Procedures that are part of a quality control program developed and implemented for all CMS			

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**EXAMPLE** Inspection Checklist  
**Recordkeeping**  
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Citation	Requirement	Comments	Yes	No
<u>Additional Comments:</u>				

NOTE: Facility may comply with §63.10(c)(10) through (12) using the SSM plan or records kept to satisfy the recordkeeping requirements of the SSM plan, provided the plan and records adequately address the requirements of §63.10(c)(10) through (12).

3. For solvent recovery systems, does the Facility maintain records of all liquid-liquid material balances performed in accordance with the requirements of ' 63.10(b) (see above)? [ ' 63.3410(b)]      Yes       No

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**EXAMPLE Inspection Checklist  
Control Device Monitoring**

**V. CONTROL DEVICE MONITORING**

*Monitoring requirements must be followed, depending on what control device is used.*

1. Do the web coating lines have intermittently controlled work stations? Yes  No   
 If no, proceed to question 2.

An intermittently-controlled work station is a work station associated with a dryer with provisions for the dryer exhaust to be delivered to or diverted from a control device through a bypass line, depending on the position of a valve or damper. NOTE: Sampling lines for analyzers, relief valves needed for safety purposes, and periodic cycling of exhaust dampers to ensure safe operation are not considered bypass lines.

If yes, then the Facility must conduct bypass & coating use monitoring according to at least one of A, B, C, or D below:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
A. Flow control position indicator				
' 63.3350(c)(1)	Has the Facility installed a flow control position indicator for each intermittently-controlled work station?			
	Does the indicator provide an accurate record indicating whether the exhaust stream from the dryer was directed to the control device or was diverted from the control device?			
	Are the time and flow control position recorded at least once per hour as well as every time the flow direction has changed?			
	Is a flow control position indicator installed at the entrance to any or all bypass lines that could divert the exhaust stream away from the control device? Which bypass lines have flow control position indicators?			

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**EXAMPLE Inspection Checklist  
Control Device Monitoring  
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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
<b>B. Car-seal or lock-and-key valve closures</b>				
' 63.3350(c)(2)	Has the Facility installed either car-seal or lock-and-key valve closures?			
	Have any or all bypass line valves been secured in the closed position with either a car-seal or a lock-and-key type configuration? Which bypass line valves have been secured in the closed position with a car-seal or a lock-and-key type configuration?			
	Is a visual inspection of each seal or closure mechanism performed at least once every month to ensure that the valve(s) or damper(s) is maintained in the closed position?			
<b>C. Valve closure continuous monitoring</b>				
' 63.3350(c)(3)	Does the Facility continuously monitor valve closures?			
	Are any or all bypass line valves or dampers determined to be in the closed position through continuous monitoring of the valve position? Which valves or dampers?			
	Is the monitoring system inspected at least once every month?			
<b>D. Automatic shutdown system</b>				
' 63.3350(c)(4)	Does the Facility have an automatic shutdown system?			
	Does the web coating line stop when flow is diverted away from an operating control device to any bypass line?			
	Is the automatic shutdown system inspected at least once every month to ensure proper operation?			
Additional Comments:				

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**EXAMPLE Inspection Checklist  
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Citation	Requirement	Measurements, Calculations & Observations	Yes	No

2. Does the Facility use a solvent recovery unit to comply with the emission standards of ' 63.3320? Yes  No

If no, go to question Number 3 below.

If yes, the requirements in A or B must be followed:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
<b>A. If the Facility chooses to install, calibrate, operate and maintain a continuous emission monitoring system (CEMS):</b>				
' 63.3350(d)(1)(i)	Are the total organic volatile matter mass flow rates at both the control device inlet and the outlet measured so that the reduction efficiency can be determined?			
	Does each continuous emission monitor comply with performance specification 6, 8, or 9 of 40 CFR Part 60, appendix B, as appropriate?			
' 63.3350(d)(1)(ii)	Are quarterly audits of the monitors being done and are quality assurance procedures of procedure 1, appendix F of 40 CFR part 60 being followed in conducting these audits?			
' 63.3350(d)(1)(iii)	Is there valid data from at least 90% of the hours during which the process is operated?			
<b>B. If the Facility chooses to perform a liquid-liquid material balance:</b>				
' 63.3350(d)(2)	Does the solvent recovery unit have a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery unit on a monthly basis?			

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	Is the device operated according to manufacturer specifications and is the device certified by the manufacturer to be accurate to within ±2.0 percent, by mass?			
Additional Comments:				

3. Is the Facility using a control device other than a solvent recovery unit to comply with the emission standards of ' 63.3320? Yes  No   
If no, go to question Number 4 below.

If yes, then the Facility must have a continuous parameter monitoring system (CPMS) in place and meet the requirements below:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3350(e)(1)	Does each CPMS complete a minimum of one cycle of operation for each successive 15-minute period? (To have a valid hour of data, there must be a minimum of four equally spaced successive cycles of CPMS operation.)			
' 63.3350(e)(2)	Does the Facility have valid data from at least 90% of the hours during which the process operated?			
' 63.3350(e)(3)	Does the Facility determine the hourly average of all recorded readings? <ul style="list-style-type: none"> <li>• <i>To calculate a valid hourly value the Facility must have at least three of four equally spaced data values from that hour from a CMS that is not out-of-control</i></li> <li>• <i>It is not necessary for the Facility to calculate the hourly average if all readings recorded clearly demonstrate continuous compliance</i></li> </ul>			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3350(e)(4)	Does the Facility determine the rolling 3-hour average of all recorded readings for each operating period (using only valid data)? <ul style="list-style-type: none"> <li>• <i>The Facility must have at least two of three of the hourly averages for that period</i></li> <li>• <i>Data must not be from out of control periods.</i></li> </ul>			
' 63.3350(e)(5)	Does the Facility record the results of each inspection, calibration, and validation check of the CPMS (including flow control position indicators, car-seal or lock-and-key valve closures, valve closure continuous monitors, and automatic shutdown systems)?			
' 63.3350(e)(6)	Does the Facility maintain the monitoring system in proper working order, including maintaining necessary parts for routine repairs of the monitoring equipment (including flow control position indicators, car-seal or lock-and-key valve closures, valve closure continuous monitors, and automatic shutdown systems)?			
' 63.3350(e)(7)	Does the Facility conduct all monitoring (including flow control position indicators, car-seal or lock-and-key valve closures, valve closure continuous monitors, and automatic shutdown systems) at all times that the unit is operating? (Excludes monitor malfunctions, associated repairs, or required QA/QC activities.)			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3350(e)(8)	For every averaging period for which there is no valid monitoring data, as required, has the Administrator been notified of the deviation in the semiannual compliance report?			
' 63.3350(e)(9)	Does the Facility use an oxidizer to comply with the emission standards?  If no, then skip to requirements listed under ' 63.3350(e)(10) below.			
' 63.3350(e)(9)(i)	Has the Facility installed and does it operate temperature monitoring equipment in accordance with manufacturer specifications?			
	Does the Facility verify the calibration of the chart recorder, data logger, or temperature indicator every 3 months or replace the applicable device?			
' 63.3350(e)(9)(ii)	Does the Facility use an oxidizer other than a catalytic oxidizer?  If no, then skip to requirements listed under ' 63.3350(e)(9)(iii) below.			
	Does the unit have a properly operating temperature monitoring device equipped with a continuous recorder?			
	Does the temperature monitoring device have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 °Celsius, whichever is greater?			
	Is the thermocouple or temperature sensor installed in the combustion chamber at a location in the combustion zone?			

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Control Device Monitoring  
(continued)**

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3350(e)(9)(iii)	Does the Facility use a catalytic oxidizer?  If no, then skip to requirements listed under ' 63.3350(e)(10) below.			
	Does the unit have a properly operating temperature monitoring device equipped with a continuous recorder?			
	Does the temperature monitoring device have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1° Celsius, whichever is greater?			
	Is the thermocouple or temperature sensor installed in the vent stream at the nearest feasible point to the inlet and outlet of the catalyst bed?			
	Does the Facility calculate the temperature rise across the catalyst?			
' 63.3350(e)(10)	Has the Facility requested approval to use a control device other than an oxidizer or to monitor an alternative parameter and comply with a different operating limit?			
	What kind of control device is being used?			
	What alternative parameters are being monitored and what is the operating limit?			
Additional Comments:				

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**EXAMPLE Inspection Checklist  
Control Device Monitoring  
(continued)**

4. Is the Facility complying through the use of a capture system and control device for one or more web coating lines? Yes  No   
 If no, this entire section (4) can be skipped.

If yes, then the Facility must develop a site-specific monitoring plan and complete all the following requirements:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3350(f)	Has the Facility developed a site-specific monitoring plan?			
' 63.3350(f)(1)(i)	Does the plan identify the operating parameter(s) to be monitored?			
' 63.3350(f)(1)(ii)	Does the plan explain why this parameter(s) is appropriate for demonstrating ongoing compliance?			
' 63.3350(f)(1)(iii)	Does the plan identify the specific monitoring procedures?			
' 63.3350(f)(2)	Does the plan specify the operating parameter value(s) or range of values that demonstrate compliance?			
	Does this value(s) or range of values represent the conditions present when the capture system is being properly operated and maintained?			
' 63.3350(f)(3)	Is all capture system monitoring conducted in accordance with the plan?			
' 63.3350(f)(5)	Is the capture system monitoring plan reviewed and updated at least annually?			
Additional Comments:				

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**EXAMPLE Inspection Checklist  
Performance Test Methods**

**VI. PERFORMANCE TEST METHODS**

*Specific performance tests are required to determine compliance according to which method you use to comply.*

1. Is the Facility using a control device to comply with the emission standards Yes  No   
 [\$63.3360(b)]?

If no, go to question Number 2 below.

If yes, then no performance tests are required if the Facility can answer yes to at least one of the following three criteria:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3360(b)(1)	Is the control device equipped with continuous emission monitors for determining inlet and outlet total organic volatile matter concentration and has capture efficiency been properly determined such that an overall organic HAP control efficiency can be calculated?			
' 63.3360(b)(2)	Has the Facility met the requirements for waiver of performance testing (' 63.7(h))? <i>The Facility must have applied for and received a waiver of performance testing from the Administrator.</i>			
' 63.3360(b)(3)	Is the control device a solvent recovery system and the Facility already complies by means of a monthly liquid-liquid material balance?			
Additional Comments:				

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2. If the Facility determines compliance by means other than determining the overall organic HAP control efficiency of a control device, does the Facility determine the organic HAP mass fraction of each coating material [§63.3360(c)]? Yes  No
- If no, go to question Number 3 below.

If yes, then Requirement A, B, C, or D must be met for each coating material “as purchased” and Requirement E must be met for each coating material ~~as applied~~.

Citation		Requirement	Measurements, Calculations & Observations	Yes	No
A	' 63.3360(c)(1)	Is the Facility using Method 311 to determine the organic HAP content? <ul style="list-style-type: none"> <li>• <i>Each organic HAP present <math>\geq 0.1\%</math> (wt) for OSHA-defined carcinogens and <math>\geq 1.0\%</math> (wt) for other organic HAP must be included</i></li> <li>• <i>Mass fraction must be expressed as a value truncated to four decimal places</i></li> <li>• <i>Calculate the total mass fraction must by adding the individual HAP mass fractions and truncating to three decimal places</i></li> </ul> NOTE: The determination may be performed by the manufacturer.			
B	' 63.3360(c)(2)	Is the Facility using Method 24 to determine the volatile organic content for use as a substitute for organic HAP? NOTE: The determination may be performed by the manufacturer.			
C	' 63.3360(c)(3)	Is the Facility using formulation data to determine the organic HAP mass fraction? <ul style="list-style-type: none"> <li>• <i>Each organic HAP present <math>\geq 0.1\%</math> (wt) for OSHA-defined carcinogens and <math>\geq 1.0\%</math> (wt) for other organic HAP must be included</i></li> </ul> NOTE: Formulation data may be provided by the manufacturer.			

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Citation		Requirement	Measurements, Calculations & Observations	Yes	No
		If there is a discrepancy between Method 311 test data and the formulation data, and the Method 211 data is higher, the Facility must use the Method 311 data.			
D	' 63.3360(c)	Has the Facility obtained approval from the Administrator for an alternative test method?			
E	' 63.3360(c)(4)	Does the Facility add any solvent or other material to the as-purchased coating material? If no, the as-applied organic HAP mass fraction equals the as-purchased mass fraction.			
		If solvent or other material is added to the coating material, has the Facility calculated an as-applied organic HAP mass fraction for each coating material?			
Additional Comments:					

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3. Does the Facility determine compliance by determining volatile organic content and coating solids content of each coating material [§63.3360(d)]? Yes  No   
If no, go to question Number 4 below.

If yes, either Requirement A or B must be met for each as-purchased coating material, and Requirement C must be met for each “as applied” coating material:

	Citation	Requirement	Measurements, Calculations & Observations	Yes	No
A	63.3360(d)(1)	Is Method 24 used to determine the mass fraction of the volatile organic and coating solids? NOTE: The determination may be performed by the manufacturer. If no, has the Facility requested an alternative technique for determining these values?			
B	63.3360(d)(2)	Is the Facility using formulation data to determine the volatile organic content and coating solids content? NOTE: formulation data may be provided by the manufacturer. NOTE: If there is a discrepancy between Method 24 and the formulation data, and the Method 24 data is higher, the Facility must use the Method 24 determination.			
C	63.3360(d)(3)	Does the Facility add any solvent or other material to the as-purchased coating material? If no, the as-applied volatile organic content is equal to the as-purchased content.			
		If solvent or other material has been added to the coating material, has the Facility calculated the as-applied volatile organic content and coating solids contents for each coating material?			
Additional Comments:					

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4. Is the Facility using an add-on control device other than solvent recovery, such as an oxidizer, to determine compliance [§63.3360(e)]? Yes  No   
If no, go to question Number 5 below.

If yes, then the Facility must conduct a performance test to determine the destruction or removal efficiency of the device and meet the following requirements:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3360(e)(1)	Did the Facility conduct an initial performance test?			
	Were control device inlet and outlet tested simultaneously?			
' 63.3360(e)(1)(i)	Did the Facility use Method 1 or 1A for sample and velocity traverses to determine sampling locations?			
' 63.3360(e)(1)(ii)	Did the Facility use Method 2, 2A, 2C, 2D, 2F, or 2G to determine the gas volumetric flow rate?			
' 63.3360(e)(1)(iii)	Did the Facility use Method 3, 3A, or 3B to determine the dry molecular weight?  If no, did the Facility use the ANSI/ASME manual method as an alternative.			
' 63.3360(e)(1)(iv)	Did the Facility use Method 4 to determine stack gas moisture?			
' 63.3360(e)(1)(v)	Did the Facility determine the gas volumetric flow rate, dry molecular weight, and stack gas moisture for each test run?			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3360(e)(1)(vi)	Did the Facility use Method 25 or 25A to determine total gaseous non-methane organic matter concentration? NOTE: The same test method must be used for both inlet and outlet measurements. NOTE: Method 25A must be used if the control device is not an oxidizer, or if the outlet volatile organic matter concentration is expected to be less than 50 ppmv.			
	Did the Facility submit the required advance notice of the intended test method along with the notification of the performance test?			
§63.3360(e)(1)(vii)	Did the Facility conduct three test runs with each test run lasting at least 1 hour?			
§63.3360(e)(1)(viii)	For each test run, did the Facility determine the volatile organic matter mass flow rate using equation 1 of this section?			
§63.3360(e)(1)(ix)	For each test run, did the Facility determine the emission control device destruction or removal efficiency using equation 2 of this section?			
§63.3360(e)(1)(x)	Did the Facility determine the control device destruction or removal efficiency as the average of the efficiencies that were determined using equation 2 as calculated above?			
' 63.3360(e)(2)	Did the Facility record process information as necessary to determine the conditions in existence at the time of the performance test?			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
	NOTE: Operations during periods of SSM do not constitute representative conditions for the purpose of a performance test.			
' 63.3360(e)(3)	If the Facility is using an add-on control device other than a solvent recovery system, has it established applicable operating limits?			
i. Is the Facility's add-on control device a <i>thermal oxidizer</i> ?				
If no, skip to question number 4.ii.				
If yes, then operating limits must be established according to the two following conditions:				
' 63.3360(e)(3)(i)(A)	During the performance test, has the combustion temperature been monitored and recorded at least once every 15 minutes during each of the three test runs?			
	Was the temperature monitored in or immediately downstream of the firebox?			
' 63.3360(e)(3)(i)(B)	Using the data collected during the performance test, does the Facility use the average combustion temperature as the minimum operating limit for the thermal oxidizer?			
ii. Is the Facility's add-on control device a <i>catalytic oxidizer</i> ?				
If no, skip to question number 5.				
If yes, then requirements under either paragraph A&B or C&D of ' 63.3360(e)(3)(ii) must be met to establish operating limits:				
' 63.3360(e)(3)(ii)(A)	During the performance test, does the Facility monitor and record the temperature just before the catalyst bed and the temperature across the catalyst bed at least once every 15 minutes during each of the three test runs?			
' 63.3360(e)(3)(ii)(B)	Using the data collected during the performance test, does the Facility use the average temperature values just before the catalyst bed and across the			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
	catalyst bed as the minimum operating limits?			
' 63.3360(e)(3)(ii)(C)	During the performance test, does the Facility monitor and record the temperature just before the catalyst bed at least once every 15 minutes during each of the three tests runs?			
	Is the average temperature found during the performance test used as the minimum operating limit for the Facility's catalytic oxidizer?			
' 63.3360(e)(3)(ii)(D)	<p>Has the Facility developed and implemented an inspection and maintenance plan for its catalytic oxidizer(s) that includes all of the following:</p> <ul style="list-style-type: none"> <li>• annual sampling and analysis of the catalyst activity (i.e., conversion efficiency);</li> <li>• monthly inspection of the oxidizer system including the burner assembly and fuel supply lines; and</li> <li>• annual internal and monthly external visual inspection of the catalyst bed to check for channeling, abrasion, and settling?</li> </ul> <p>If problems were found, has a new performance test been conducted?</p> <p>When? _____</p> <p>What were the results?</p>			

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<b>Citation</b>	<b>Requirement</b>	<b>Measurements, Calculations &amp; Observations</b>	<b>Yes</b>	<b>No</b>
Additional Comments:				

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5. Does the Facility need to determine capture efficiency [§63.3360(f)]? Yes  No   
 (Needs to be done if complying by ' 63.3370(e), (f), (g), (h), (i)2, (k), (n)(2), (n)(3), or (p)  
 If no, go to question Number 6 below.

If yes, then the Facility must meet the requirements under paragraphs 1, 2, or 3 of ' 63.3360(f):

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3360(f)(1)	Is the Facility's capture system a permanent total enclosure (PTE), making capture efficiency 100%?			
	Has the Facility confirmed that the system is a PTE using Method 204 of 40 CFR Part 51, appendix M, and ensured all exhaust gases from the enclosure are delivered to the control device?			
' 63.3360(f)(2)	Has the Facility determined capture efficiency according to the protocols for testing with temporary total enclosures that are specified in Methods 204 and 204A-F of 40 CFR Part 51, appendix M?  NOTE: Never-controlled work stations may be excluded from this determination.			
' 63.3360(f)(3)	Does the Facility use a capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A of subpart KK of this part?  NOTE: Never-controlled work stations may be excluded from this determination.			
Additional Comments:				

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6. When determining compliance, does the Facility take into account the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere [§63.3360(g)]?      Yes       No
- If no, go to question Number 7 below.

If yes, the Facility must meet all of the following requirements:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3360(g)	Has the Facility developed a testing protocol to determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere?			
	Has this testing protocol been submitted to the Administrator for approval along with the Facility's site-specific test plan?			
	Does the test protocol determine the mass of organic HAP retained in the coated web or otherwise not emitted to the atmosphere? If no, the Facility must use the volatile organic matter content as a surrogate for the HAP content of the coating.			
Additional Comments:				

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7. Does the Facility use multiple control devices in series to comply with §63.3360(h)? Yes  No   
 If no, go to the next section entitled “Demonstrating Compliance.”

If yes, then the Facility must meet the following requirements:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
§ 63.3360(h)	Does the performance test include data for at least the inlet to the first control device in the series, the outlet of the last control device in the series, and all intermediate streams that are not subsequently treated by any of the control devices in the series?			
Additional Comments:				

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**VII. DEMONSTRATING COMPLIANCE**

*Compliance must be demonstrated applying one of the following methods.*

1. Does the Facility comply by using “as-purchased” coating materials to meet emission standards [§63.3370(b)]?      Yes     No

If no, go to question Number 2 below.

If yes, the following must be demonstrated:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
<b>Existing Sources</b>				
' 63.3370(b)(1) and (2)	Does the Facility demonstrate that each coating material applied during the month contains no more than 0.04 kg organic HAP per kg coating material or no more than 0.2 kg organic HAP per kg coating solids on an as-purchased basis?			
<b>New Sources</b>				
' 63.3370(b)(1) and (2)	Does the Facility demonstrate that each coating material applied during the month contains no more than 0.016 kg organic HAP per kg coating material or no more than 0.08 kg organic HAP per kg coating solids on an as-purchased basis?			
Additional Comments:				

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2. Does the Facility comply by using *as-applied* coating materials to meet emission standards [§63.3370(c)]? Yes  No   
 If no, go to question Number 3 below.

If yes, and if the Facility is an *existing* source, then one of § 63.3370(c)(1), (2), (3), or (4) must be followed:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
<b>Existing Sources must meet one of the following requirements:</b>				
§ 63.3370(c)(1)	Does the Facility demonstrate that each coating material applied during the month contains no more than 0.04 kg organic HAP per kg coating material, “as-applied”?			
§63.3370(c)(2)	Does the Facility demonstrate that each coating material applied contains no more than 0.20 kg organic HAP per kg coating solids, “as-applied”?			
§ 63.3370(c)(3)	Does the Facility demonstrate that the monthly average “as-applied” organic HAP content of all coating materials is less than 0.04 kg organic HAP per kg of coating material applied?			
§ 63.3370(c)(4)	Does the Facility demonstrate that the monthly average “as-applied” organic HAP content of all coating materials is less than 0.20 kg organic HAP per kg of coating solid applied?			
<b>New Sources must meet one of the following requirements:</b>				
§ 63.3370(c)(1)	Does the Facility demonstrate that each coating material applied during the month contains no more than 0.016 kg organic HAP per kg coating material, “as-applied”?			
§63.3370(c)(2)	Does the Facility demonstrate that each coating material applied contains no more than 0.08 kg organic HAP per kg coating solids, “as-applied”?			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3370(c)(3)	Does the Facility demonstrate that the monthly average “as-applied” organic HAP content of all coating materials is less than 0.016 kg organic HAP per kg of coating material applied?			
' 63.3370(c)(4)	C. Does the Facility demonstrate that the monthly average “as-applied” organic HAP content of all coating materials is less than 0.08 kg organic HAP per kg of coating solid applied?			
Additional Comments:				

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3. Does the Facility comply by tracking total monthly organic HAP applied [§63.3370(d)]? Yes  No   
 If no, go to question Number 4 below.

If yes, then the following must be demonstrated:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
' 63.3370(d)	Does the Facility demonstrate that the total monthly organic HAP applied is less than the calculated equivalent allowable organic HAP (as calculated using equation 13a or b of ' 63.3370(l))?			
Additional Comments:				

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4. Does the Facility demonstrate compliance by use of a capture system and control device [§63.3370(e), (f), (g), or (h)]? Yes  No   
If no, go to question Number 6 below.

If yes, the Facility must meet one of these requirements:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
<b>Existing Sources:</b>				
' 63.3370(e)	Does the Facility demonstrate an overall organic HAP control efficiency of at least 95% on a monthly basis?			
	Does the Facility demonstrate that its oxidizer outlet organic HAP concentration is no greater than 20 ppmv, by compound, on a dry basis, and capture efficiency is 100%? (Continuous compliance is demonstrated through continuous monitoring of capture system and control device monitoring parameters.)			
' 63.3370(f)	Does the Facility demonstrate that the organic HAP emitted does not exceed 0.20 kg organic HAP per kg coating solids on a monthly average “as-applied” basis [Equation 8, for solvent recovery devices performing a liquid-liquid material balance, or equation 12]?			
' 63.3370(g)	Does the Facility demonstrate that the overall organic HAP emission rate does not exceed 0.04 kg organic HAP per kg coating material on a monthly average “as-applied” basis?			
' 63.3370(h)	Does the Facility demonstrate that the overall organic HAP emission rate is less than the monthly allowable organic HAP emissions limit, which is calculated under ' 63.3370(l)?			
<b>New Sources:</b>				
' 63.3370(e)	Does the Facility demonstrate an overall organic HAP control efficiency of at least 98% on a monthly basis?			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
	Does the Facility demonstrate that its oxidizer outlet organic HAP concentration is no greater than 20 ppmv, by compound, on a dry basis, and capture efficiency is 100%? (Continuous compliance is demonstrated through continuous monitoring of capture system and control device monitoring parameters.)			
' 63.3370(f)	Does the Facility demonstrate that the organic HAP emitted does not exceed 0.08 kg organic HAP per kg coating solids on a monthly average "as-applied" basis [Equation 8, for solvent recovery devices performing a liquid-liquid material balance, or equation 12]?			
' 63.3370(g)	Does the Facility demonstrate that the overall organic HAP emission rate does not exceed 0.016 kg organic HAP per kg coating material on a monthly average "as-applied" basis?			
' 63.3370(h)	Does the Facility demonstrate that the overall organic HAP emission rate is less than the monthly allowable organic HAP emission rate, which is calculated under ' 63.3370(i)?			
Additional Comments:				

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5. Does the Facility demonstrate compliance by use of multiple capture systems and/or multiple control devices [§63.3370(n)]? Yes  No
- If no, go to question Number 6 below.

If yes, the Facility must meet one of the following requirements:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
<b>Existing Sources</b>				
' 63.3370(n)(6)(i)	Does the Facility demonstrate that the total mass of organic HAP emitted based on coating solids applied is not more than 0.20 kg organic HAP per kg coating solids applied?			
' 63.3370(n)(6)(ii)	Does the Facility demonstrate that the total mass of organic HAP emitted is not more than 0.04 kg organic HAP per kg coating material applied?			
' 63.3370(n)(6)(iii)	Does the Facility demonstrate that the total mass of organic HAP emitted during the month is less than the calculated allowable organic HAP determined in ' 63.3370(l)?			
' 63.3370(n)(6)(iv)	Does the Facility demonstrate that the total mass of organic HAP emitted was not more than 5% of the total mass of organic HAP applied for the month? The total mass of organic HAP applied in the month is determined using Equation 6.			
<b>New Sources</b>				
' 63.3370(n)(6)(i)	Does the Facility demonstrate that the total mass of organic HAP emitted based on coating solids applied is not more than 0.08 kg organic HAP per kg coating solids applied?			
' 63.3370(n)(6)(ii)	Does the Facility demonstrate that the total mass of organic HAP emitted is			

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Citation	Requirement	Measurements, Calculations & Observations	Yes	No
	not more than 0.016 kg organic HAP per kg coating material applied?			
' 63.3370(n)(6)(iii)	Does the Facility demonstrate that the total mass of organic HAP emitted during the month is less than the calculated allowable organic HAP determined in ' 63.3370(l)?			
' 63.3370(n)(6)(iv)	Does the Facility demonstrate that the total mass of organic HAP emitted was not more than 2% of the total mass of organic HAP applied for the month? The total mass of organic HAP applied in the month is determined using Equation 6.			
Additional Comments:				

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6. Does the Facility demonstrate compliance by use of a combination of both compliant coatings and control devices [§63.3370(n)(6)]? Yes  No   
 If no, you have completed the checklist

If yes, the Facility must meet one of the following requirements:

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
<b>Existing Sources</b>				
' 63.3370(n)(6)(i)	Does the Facility demonstrate that the total mass of organic HAP emitted based on coating solids applied is not more than 0.20 kg organic HAP per kg coating solids applied?			
' 63.3370(n)(6)(ii)	Does the Facility demonstrate that the total mass of organic HAP emitted is not more than 0.04 kg organic HAP per kg coating material applied?			
' 63.3370(n)(6)(iii)	Does the Facility demonstrate that the total mass of organic HAP emitted during the month is less than the calculated allowable organic HAP determined in ' 63.3370(l)?			
<b>New Sources:</b>				
' 63.3370(n)(6)(i)	Does the Facility demonstrate that the total mass of organic HAP emitted based on coating solids applied is not more than 0.08 kg organic HAP per kg coating solids applied?			
' 63.3370(n)(6)(ii)	Does the Facility demonstrate that the total mass of organic HAP emitted is not more than 0.016 kg organic HAP per kg coating material applied?			
' 63.3370(n)(6)(iii)	Does the Facility demonstrate that the total mass of organic HAP emitted during the month is less than the calculated allowable organic HAP determined in ' 63.3370(l)?			

NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS  
PAPER AND OTHER WEB COATING  
40 CFR Part 63, Subpart JJJJ

**EXAMPLE** Inspection Checklist  
**Demonstrating Compliance**  
(continued)

Citation	Requirement	Measurements, Calculations & Observations	Yes	No
Additional Comments:				