



Louisville Metro Air Pollution Control District
 701 West Ormsby Avenue, Suite 303
 Louisville, Kentucky 40203-3137



02 January 2019
Title V Statement of Basis

Owner: Reynolds Consumer Products LLC

Source: Reynolds Consumer Products LLC – Louisville Foil Plant

Plant Location: 2827 Hale Avenue, Louisville, Kentucky 40211

Date Application Received: 12/22/2016 **Date Admin Complete:** 12/23/2016

Date of Draft Permit: 01/27/2018; 11/08/2018

Date of Proposed Permit: 01/27/2018; 03/08/2018; 11/08/2018

District Engineer: Aaron DeWitt **Permit No:** O-0186-18-V

Plant ID: 0186 **SIC Code:** 3353 **NAICS:** 331315

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

The purpose of this action is a standard permit renewal.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}). Jefferson County is classified as nonattainment area for ozone (O₃). This facility is located in the portion of Jefferson County that is an attainment area for sulfur dioxide (SO₂).

Application Type/Permit Activity:

- Initial Issuance
- Permit Revision
 - Administrative
 - Minor
 - Significant
- Permit Renewal

Compliance Summary:

- Compliance certification signed
- Compliance schedule included
- Source is out of compliance
- Source is operating in compliance

I. Source Information

1. **Product Description:** Reynolds Consumer Products LLC produces commercial aluminum foil.
2. **Process Description:** Reynolds Consumer Products LLC rolls and anneals aluminum until final product is achieved.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
Plantwide	Plantwide Section
U1	Rolling Mill Group
U2	Oven Group
U3	Boiler
U4	Parts Washers
U7	VOC Storage Tank Group (Insignificant Activities)
U10	Rotogravure Press & Thermal Oxidizer
U11	Emergency Firewater Pump (Insignificant Activity)
IA1	Indirect Heat Exchangers
IA2	Core Winders
IA3	Carton Labeling Inkjet Printers
IA4	Line Carton Gluers
IA5	Better Engineering Dishwasher
IA6	Roll Grinders
IA7	Diesel Storage Tank
IA8	Cooling Towers
IA9	Abrasive blast cabinet

5. **Fugitive Sources:** There are fugitive emissions from Mills 1 through 6 and associated equipment, annealing oven #15 that are not captured by afterburner, and Rotogravure printing/coating press that are not captured by thermal oxidizer

6. Permit Revisions:

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	158-97-TV	4/5/2001	12/10/2000	Initial	Entire Permit	Initial Permit Issuance
R1	158-97-TV (R1)	5/31/2012	2/11/2012 4/14/2012	Renewal	Entire Permit	Scheduled Permit Renewal: see below
<p>Change of Responsible Official; Incorporation of Construction Permits: 208-00-C for Annealing Oven #15, 209-00-C for its thermal afterburner, 30-03-C for a Boiler, 226-06-C for inkjet printers, 658-08-C for raw material change, 1-09-C for a rotogravure press, 2-09-C for a thermal oxidizer, 171-09-C for inkjet printers, 145-09-C for tanks and totes, 157-09-C for core winders, 32674-11-C for modification to the mills, 136-10-C for modification to the line carton gluers. Equipment in Construction Permit 3-09-C was not installed Equipment in Construction Permit 636-07-C was removed. Remove Emission Unit U5. Update the Insignificant Activities List</p>						
R2	158-97-TV (R2)	4/27/2016	N/A	Administrative Revision	U1, IA List	See below
<p>Incorporation of Construction Permit 34361-12-C for HOS-60 Heavy Oil Scrubber System in U1 to control emission points E2 and E3 Added requirements from Board Order Added the following IAs: 4 Ink Jet Printers 1 Parts Washer 1 Cooling Tower 1 1.674 MMBtu/hr Boiler Core Winder Dust Collector</p>						

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
R3	158-97-TV (R3)	9/15/2016	N/A	Administrative Revision	IA List, Unit IA3	Incorporation of two (2) replacement inkjet printers in IA section; change in PTE for inkjet printers on Regulation 7.25 list in comments of all Units that applies
N/A	O-0186-18-V	1/02/2019	1/27/2018; 11/8/2018	Renewal	Entire Permit	Permit Renewal: see below
				Administrative		Administrative Revision: see below
<p>Permit Renewal Changes:</p> <ol style="list-style-type: none"> 1. Updated to newest format 2. Added plantwide emissions section for VOC and TAC 3. Updated VOC Storage Tank Group (now U7), Regulation 7.12 language 4. Updated Emergency Firewater Pump (U11) 40 CFR Part 63, Subpart ZZZZ language 5. Updated Insignificant Activities List 6. Changed name of IA1 Boiler group to IA1 Indirect Heat Exchangers 8. Added Insignificant Activities Emission Unit IA7 for Diesel Storage Tanks 9. Added Insignificant Activities Emission Unit IA8 for Cooling Towers 10. Added requirements for Regulation 1.05 plan 11. Added Calculation Methodology (Attachment A) 12. Added Testing Requirements to Emission Units U1, U2, and U10 13. Added Insignificant Activities Emission Unit IA9 for Abrasive blast cabinets 14. Replaced Insignificant Activities Emission Unit IA3 Carton Labeling Inkjet Printers E62 & E63. 						

7. Construction Permit History since Last Title V Renewal:

Permit No.	Effective Date	Description
34361-12-C	5/9/2012	One (1) HOS-60 Heavy Oil Scrubber System manufactured by Busch International with a forced airflow of 60,000 acfm to control Emission Unit U1 Emission Points E2 and E3

8. Permit Renewal-Related Documents

Document #	Date Received	Type
34122	7/11/2002	Modification (Annealing Oven #15 with afterburner)

Document #	Date Received	Type
34121	10/4/2005	Renewal (includes CAM plan)
9872	4/8/2008	RO Change
9874	10/16/2009	Update to Incorporate Construction Permits (boiler, press & RTO; inkjet printers, storage tanks, core winders (IA))
34116	11/18/2011	Insignificant Activities and Calculations Submission
35012	12/2/2011	Update to Incorporate Construction Permits (mill modification)
35013	12/2/2011	IA Update (line carton gluers, boiler & space heaters (IA))
35215	1/17/2012	Name/Ownership Change
35500	1/31/2012	Update to Incorporate Construction Permit (Heavy Oil Scrubber System)
35716	2/10/2012	Renewal, Permit 158-97-TV (R1)
35715	2/10/2012	Renewal, Statement of Basis for Permit 158-97-TV (R1)
50321	9/21/2012	IA Update (Ink Jet Printer)
55442	4/17/2013	IA Update (Parts Washer)
55486	4/18/2013	IA Update (Cooling Towers)
66033	7/11/2014	IA Update (Ink Jet Printer)
72575	7/20/2015	IA Update (1.674 MMBtu/hr Boiler)
73767	10/7/2015	IA Update (Ink Jet Printers) Application
75706	3/2/2016	IA Update (Core Winder Dust Collector) Application
76783	4/27/2016	Admin Revision, Permit 158-97-TV (R2)
79250	8/31/2016	IA Update (Inkjet Printers) Application
79425	9/15/2016	Admin Revision, Permit 158-97-TV (R3)
80044	10/14/2016	Notification of Regulation 5.21 BAC Changes
80240	11/1/2016	Email from District about forms to include in application
80347	11/4/2016	Correspondence about application fee
80407	11/8/2016	IA Update (Inkjet Printers)
80464	11/14/2016	Correspondence that new and replacement ink jet printers will be insignificant activities
80501	11/17/2016	Email Correspondence to set up a meeting discussing Title V renewal

Document #	Date Received	Type
80812	12/12/2016	Email Correspondence regarding filing fee for Title V Renewal Application
80876	12/19/2016	Company's proposed organization for the permit renewal application
80875	12/19/2016	District approval of company's proposed organization for the permit application
80880	12/19/2016	Correspondence regarding Stack Forms
80913	12/20/2016	Correspondence regarding expected date of application submittal
80979	12/22/2016	Request for Determination of Non-Applicability
80984	12/22/2016	Title V Renewal Application
81015	12/23/2016	Administratively Complete Checklist
81017	12/23/2016	Administratively Complete Email to Company
81023	12/27/2016	Company's red-line of permit 158-97-TV(R3)
81286	1/13/2017	Question to Company about Mills 11 and 23 being removed.
81321	1/17/2017	Response to question about removal of Mills 11 and 23
81415	1/24/2017	Notification from company of Mill 4 Safety Project
81486	1/27/2017	Questions from District about Mill 4 Safety Project
81500	1/30/2017	Company response to questions from District about Mill 4 Safety Project
81773	2/9/2017	District Question and Company Response about Daily Records Keeping
81782	2/9/2017	Discussion Regarding Mill 4 Safety Project
81800	2/10/2017	Discussion Regarding Mill 4 Safety Project
81984	2/17/2017	Insignificant Activities Clarification
81558	1/31/2017	Plantwide Approved Potential to Emit
82954	3/22/2017	Correspondence that Welding Equipment is only used for maintenance
85580	7/31/2017	IA Update (Abrasive Blast) Application
85933	8/15/2017	Correspondence that Abrasive Blast Equipment will be added to IA list

Document #	Date Received	Type
88587	10/30/2017	Correspondence of tank level indicators
88788	11/07/2017	Request for comment period extension
89329	11/27/2017	Company comments for draft permit
89330	11/30/2017	District request for more information
89862 & 89865	1/03/2018	District request for comment
90047 & 90050	1/12/2018	Company responses to request for comment
90188	1/25/2018	District response to company comments
90827	2/22/2018	Reynolds submitted application to replace IA3 E62 & E63
90866	2/26/2018	Company comments on Public Noticed TV permit
91062	3/7/2018	District Response to Comments
91487	4/06/2018	Reynolds submitted Petition for Administrative Hearing
92050	5/16/2018	AP-100A submitted for RO change
92696	6/26/2018	District response to Petition for Administrative Hearing, and request for meeting to discuss
92696	7/5/2018	Reynolds response to request for meeting, date set for 7/24/2018
93817	8/17/2018	Reynolds response to District proposed changes to permit regarding Petition for Administrative Hearing
94038	8/31/2018	District response to 8/17/2018 letter
94060	9/5/2018	Reynolds reply to follow-up meeting regarding Mill 6 performance calculations, date set for 9/27/2018
94469	9/27/2018	Mill 6 hood design and capture efficiency calculations submittal from August 1995
94474	9/27/2018	District request for additional information regarding dimensions of C11
94723	10/04/2018	Reynolds response to request for additional information 9/27/2018
94726	10/05/2018	Reynolds response to request for additional information 9/27/2018
95200	10/22/2018	District final response to Petition for Administrative Hearing

Document #	Date Received	Type
95542	11/01/2018	Reynolds request for phone conference to discuss final issues

9. Emission Summary:

Pollutant	District Calculated Actual Emissions (tpy) 2017 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	11.91	No
NO _x	15.21	No
SO ₂	0.17	No
PM ₁₀	4.66	No
VOC	834.16	Yes
Total HAPs	0.34	No

10. Applicable Requirements:

PSD 40 CFR 60 SIP 40 CFR 63
 NSR 40 CFR 61 District-Origin Other

11. Referenced MACT Federal Regulations:

40 CFR 63 Subpart ZZZZ National Emissions Standards for Hazardous air Pollutants for Stationary Reciprocating Internal Combustion Engines

12. Referenced non-applicable MACT Federal Regulations

40 CFR 63 Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

40 CFR 63 Subpart KK National Emission Standards for the Printing and Publishing Industry

40 CFR 63 Subpart JJJJ National Emission Standards for Hazardous Air Pollutant Emissions: Paper and Other Web Coating

13. Referenced non-MACT Federal Regulations:

40 CFR 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR 64

Compliance Assurance Monitoring for Major Stationary Sources

14. Reference non-applicable non-MACT Federal Regulations

40 CFR 60 Subpart Kb

Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

40 CFR 60 Subpart QQ

Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing

40 CFR 60 Subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

II. Regulatory Analysis

1. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program
2. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. The source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers chills, air conditioners and other HVAC equipment.
3. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
4. **40 CFR Part 64 Applicability Determination:** This source is subject to 40 CFR Part 64 - *Compliance Assurance Monitoring (CAM) for Major Stationary Source* since the source is major for VOC and needs to apply control devices to ensure the compliance with the VOC emission standards specified in the Title V permit.
5. **Basis of Regulation Applicability**
 - a. **Plant-wide**

Reynolds consumer Products is a Title V major source for VOC. Regulation 2.16 - *Title V Operating Permits* establishes requirements for major sources.

The source is subject to an emission cap of 1,298 tpy for VOC from emission units U1 and U2 for PSD/NSR netting in accordance with Regulations 2.04 and 2.05.

Regulation 7.25 requires an affected facility to be equipped with and utilize best available control technology (BACT). The following affected facilities are included in the Regulation 7.25 non-BACT plant-wide 5 ton per year limit:

Unit	Point	Description	PTE
U1	E26, E105	Baron Still, Spent Filter Media Dumpster	4.38, 4.76
U2	E20	Annealing Oven #31	1.70
IA2	E43-E53	Core Winders	0.26
IA3	E56-E62, E89-E91	Ink Jet Printers	0.40
IA4	E73-E77	Line Cartoners	0.20
IA5	E87	Better Engineering Parts Washer	0.07

Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. Reynolds Consumer Products submitted their Category 1 and Category 2 TAC Environmental Acceptability Demonstration to the District on January 31, 2007 and the additional submittal dated August 22,2007. The report stated that emissions of the Category 1 TACS (benzene, formaldehyde) and the Category 2 TACs (lead, naphthalene, and toluene) are *de minimis*. LMAPCD approved the STAR EA Compliance Demonstration for Category 1 TACs on October 6, 2008. An additional Category 2 Environmental Acceptability Demonstration was received on March 24, 2008 and the company claimed that no Category 2 TAC was reported in the 2006 Toxic Release Inventory program, per Regulation 5.21, section 4.14.1. All of the TAC emissions were determined to be *de minimis* except ammonia emitted by Emission Unit U10 Rotogravure Press & Thermal Oxidizer. The potential uncontrolled hourly emissions (10.4 lb/hr) of ammonia cannot exceed the lb/hr *de minimis* threshold limit, however, the annual emissions could exceed the *de minimis* limit of 48,000 lb/yr. The source is required to meet an emission limit of 48,000 lb/yr for ammonia. LMAPCD approved the STAR EA Compliance Demonstration for Category 2 TACs on January 18, 2012.

The TAC emissions from the combustion of natural gas are considered to be “*de minimis* emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or

process equipment that are not the products of the combustion of natural gas.

Regulation 2.16, section 4.1.9.1 and 4.1.9.2 requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the District upon request.

Regulation 2.16, section 4.3.5, requires stationary sources for which a Title V is issued shall submit an annual compliance certification by April 15 of the following calendar year. In addition, as required by Regulation 2.16, section 4.1.9.3, the source shall submit compliance reports at least every six months to show compliance with the permit. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

b. Emission Unit U1 – Mill Group

i. Equipment:

Emission Point	Description	Applicable Regulation	Basis for Applicability
E1	Rolling Mill #1; (Reynolds Metals,) Capacity: 4,500 ft/min	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24, 6.43, 40 CFR 64	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements
E1a	Mill Pit 1 (Insignificant Activity) Estimated Capacity: 2,697 gallons		Regulation 6.24 - Any affected facility using any organic materials which was in being prior to June 13, 1979.
E1b	Mill 1 Hyd. Unit (Insignificant Activity) Capacity: 500 gallons		Regulation 6.43 – This source was identified to enable a 15% reduction in VOC emissions from the 1990 baseline level and voluntarily agreed to the requirements.
E1c	Mill 1 Lube Oil (Insignificant Activity) Capacity: 500 gallons		40 CFR 64 – Rolling Mills 2 and 3 are subject to an emission limitation, uses a control device to achieve compliance and has pre-control emissions that exceed the major source threshold.
E2	Rolling Mill #2; (Reynolds Metals)		1.05, 2.04, 2.05, 5.00,

Emission Point	Description	Applicable Regulation	Basis for Applicability
	Capacity: 4,000 ft/min	5.01, 5.20, 5.21, 5.22, 5.23, 6.24, 6.43, 40 CFR 64	
E2a	Mill Pit 2 (Insignificant Activity) Estimated Capacity: 1237 gallons		
E2b	Mill 2 Hyd. Unit (Insignificant Activity) Capacity: 450 gallons		
E2c	Mill 2 Lube Oil (Insignificant Activity) Capacity: 500 gallons	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24, 6.43, 40 CFR 64	
E2d	M2/M3 HOS Tank Capacity: 2500 gallons		
E3	Rolling Mill #3; (Reynolds Metals) Capacity: 4,000 ft/min	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24, 6.43, 40 CFR 64	
E3a	Mill Pit 3 (Insignificant Activity) Estimated Capacity: 1378 gallons		
E3b	Mill 3 Hyd. Unit (Insignificant Activity) Capacity: 500 gallons		
E3c	Mill 3 Lube Oil (Insignificant Activity) Capacity: 400 gallons		

Emission Point	Description	Applicable Regulation	Basis for Applicability
E4	Rolling Mill #4; (Reynolds Metals) Capacity: 4,500 ft/min	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24,	
E4a	Mill Pit 4 (Insignificant Activity) Estimated Capacity: 3547 gallons	6.43, 40 CFR 64	
E4b	Mill 4 Hyd. Unit (Insignificant Activity) Capacity: 500 gallons		
E4c	Mill 4 Lube Oil (Insignificant Activity) Capacity: 450 gallons	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24, 6.43, 40 CFR 64	
E5	Rolling Mill #5; (Reynolds Metals) Capacity: 4,500 ft/min		
E5a	Mill Pit 5 (Insignificant Activity) Estimated Capacity: 2647 gallons		
E5b	Mill 5 Hyd. Unit (Insignificant Activity) Capacity: 450 gallons		<p>Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements</p> <p>Regulation 6.43 – This source was identified to enable a 15% reduction in VOC emissions from the 1990 baseline level and voluntarily agreed to the requirements.</p> <p>Regulation 7.25 (BACT) – Affected facility constructed after June 13, 1979 for VOC.</p> <p>40 CFR 64 – This rolling mill is subject to an emission limitation, uses a control device to achieve compliance and has pre-control emissions that exceed the major source threshold.</p>
E5c	Mill 5 Lube Oil (Insignificant Activity) Capacity: 500 gallons		
E6	Rolling Mill #6;	1.05, 2.04,	

Emission Point	Description	Applicable Regulation	Basis for Applicability
	(Davy/Kvaemer) Schneider Filter Capacity: 5,400 ft/min	2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.43, 7.25 (BACT), 40 CFR 64	
E6a	Mill 6 Main Drive Lube System (Insignificant Activity) Capacity: 300 gallons		
E6b	Mill 6 Return Tank (Insignificant Activity) Capacity: 5000 gallons		
E6c	Mill 6 Hyd. Tank (Insignificant Activity) Capacity: 730 gallons	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.43, 7.25 (BACT), 40 CFR 64	<p>Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements</p> <p>Regulation 6.43 – This source was identified to enable a 15% reduction in VOC emissions from the 1990 baseline level and voluntarily agreed to the requirements.</p> <p>Regulation 7.25 (BACT) – Affected facility constructed after June 13, 1979 for VOC.</p> <p>40 CFR 64 – This rolling mill is subject to an emission limitation, uses a control device to achieve compliance and has pre-control emissions that exceed the major source threshold.</p>
E6d	“D” Filter System (Mill 6) (Insignificant Activity) Capacity: 24,846 gallons		
E6e	Rectified Oil Tank B8.1 (Insignificant Activity) Capacity: 3,304 gallons		
E6f	Waste Oil Tank B9.1 (Insignificant Activity) Capacity: 659 gallons		
E6g	Oil Storage B1.1 (Insignificant Activity) Capacity: 3,936 gallons		

Emission Point	Description	Applicable Regulation	Basis for Applicability
E6h	Crude Distillate Tank B7.1 (Insignificant Activity) Capacity: 3,963 gallons		
E26	Baron Still Distillation Unit	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25 (non-BACT)	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 7.25 (BACT) – Affected facility constructed after June 13, 1979 for VOC.
E105	Spent Filter Media Dumpster (Insignificant Activity)	1.05, 5.00, 5.01, 5.20, 5.22, 5.23, 7.25	
E105a	Filter Room: “A” System (Insignificant Activity) Capacity: 8,546 gallons		
E105b	Filter Room: “B” System (Insignificant Activity) Capacity: 6,885 gallons		
E105c	Filter Room: “C” System (Insignificant Activity) Capacity: 14,109 gallons		
E107	UCON 220 Storage Tote (Insignificant Activity) Capacity: 300 gallons		

ii. **Standards/Operating Limits**

1) **TAC**

Regulations 5.00 and 5.21 requires TAC emissions to not exceed Environmentally Acceptable levels. A one-time compliance demonstration was performed on 09/04/08 for TACs from the rolling oil, Magiesol 44, and the potential emissions are de minimis.

2) **VOC**

- (a) Through Regulation 2.04, the 1,258 tons per year VOC limit was established after the company demonstrated that this project netted out for NSR. Before the installation of Rolling Mill #6, the plant had a VOC limit of 778 tons per year for all equipment in Units U1 and U2. The potential emissions from Rolling Mill #6 were 480 tons of VOC per year. ($778 + 480 = 1,258$) During the 10 year contemporaneous period there were VOC emission increases of 4.6 tons per year from parts cleaners, storage tanks, and the distillation unit. In order to 'net out', the company withdrew 455 tons per year emission reduction credits of VOC from the Emissions Bank. Subtracting the VOC emission credits from the total increase in emissions results in an overall emission increase of 29.6 tons per year. [$(480 + 4.6) - 455 = 29.6$] This is less than the significant level of 40 tons specified in Regulation 2.04, Appendix A. The source requested to modify the rolling mills to allow them to operate at an increased speed and to increase their production capacities. An increased in allowed emissions from 1,258 to 1,298 tons per year VOC is not a "significant emissions increase" as that term is defined in Regulation 2.05.
- (b) The District has determined that the monthly emission limit of 130 tons of VOC that was contained in construction permit 32674-11-C was not needed for netting purposes under NSR, as required by Regulation 2.04 since the 12 month rolling total provides the same level of protection and is used to demonstrate compliance.
- (c) Regulation 6.24 limits the pound per hour and pound per day emission of Class III Solvents. Class III

solvents include any organic material which is not classified as a Class I or a Class II solvent.

- (d) Regulation 6.43, Section 17 requires Reynolds Consumer Products' rolling coolant to meet certain specifications.
- (e) Regulation 7.25 requires an affected facility to be equipped with and utilize best available control technology (BACT). The oil absorption and recovery unit ("scrubber") that controls VOC emission from Rolling Mill #6 (90% capture and 95% control efficiency) is considered BACT to demonstrate compliance with the District Regulation 7.25. The equipment specified on the permit application has been determined by the District to meet the requirement in District Regulation 7.25 for "Best Available Control Technology"

iii. **Monitoring and Recordkeeping**

1) **VOC**

- (a) Regulation 6.43 has specific record keeping requirements to ensure ongoing compliance with the terms and condition of the permit.
- (b) The Compliance Assurance Monitoring rule (40 CFR 64) aims to have owners and operators maintain their control devices at the levels that ensure compliance. The rule allows owners and operators to design CAM plans on current requirements and operating practices, to select representative parameters upon which compliance can be ensured, to establish indicator ranges – or procedures for setting the indicator ranges – for the parameters, to use performance testing and other information to verify the parameters and ranges, and to correct control device performance problems as expeditiously as practicable. In accordance with 40 CFR 64, Compliance Assurance Monitoring for Major Stationary Sources, Reynolds was required to propose a CAM Plan for VOC, based on current process and control device operating requirements and practices. The initial CAM Plan was received on October 4, 2005. Supplemental information was

received on May 5, 2011 and April 4, 2012.

c. Emission Unit U2 – Oven Group

i. Equipment:

Emission Point	Description	Applicable Regulation	Basis for Applicability
E9	Annealing Oven #1	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 6.24 - Any affected facility using any organic materials which was in being prior to June 13, 1979.
E10	Annealing Oven #2		
E11	Annealing Oven #3		
E12	Annealing Oven #4		
E13	Annealing Oven #5		
E16	Annealing Oven #21		
E17	Annealing Oven #22		
E18	Annealing Oven #24		
E19	Annealing Oven #25		
E15	Annealing Oven #15	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25 (BACT)	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 7.25 - Affected facility constructed after June 13, 1979 for VOC.
E20	Annealing Oven #31	1.05, 2.04, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25 (non-BACT)	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 7.25 - Affected facility constructed after June 13, 1979 for VOC.

ii. Standards/Operating Limits

1) TAC

Regulations 5.00 and 5.21 requires TAC emissions to not exceed Environmentally Acceptable levels. A one-time compliance demonstration was performed on 09/04/08 for TACs from the rolling oil, Magiesol 44, and the potential emissions are de minimis.

2) VOC

(a) Through Regulation 2.04, the 1,258 tons per year VOC limit was established after the company demonstrated that this project netted out for NSR. (See Emission Unit U1 above for details)

- (b) The District has determined that the monthly emission limit of 130 tons of VOC that was contained in construction permit 32674-11-C was not needed for netting purposes under NSR, as required by Regulation 2.04.
- (c) Regulation 6.24 limits the pound per hour and pound per day emission of Class III Solvents. Class III solvents include any organic material which is not classified as a Class I or a Class II solvent.
- (d) Regulation 7.25 requires an affected facility to be equipped with and utilize best available control technology (BACT).

d. Emission Unit U3 – Boiler

i. Equipment:

Emission Point	Description	Applicable Regulation	Basis for Applicability
E38	24.5 MMBtu/hr natural gas Cleaver Brooks Boiler	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.06, 40 CFR 60 Subpart Dc	Regulation 7.06 – Establishes emission standards for indirect heat exchangers constructed after April 9, 1972 with a heat input capacity of less than 250 MMBtu/hr 40 CFR 60 Subpart Dc – applies to steam generating units for which construction or modification is commenced after June 9, 1989 and has a maximum design heat input capacity between 10 to 100 MMBtu/hr.

ii. Standards/Operating Limits

1) Opacity

The boiler is subject to the opacity standards in accordance with Regulation 7.06, section 4.2.

2) PM

The cleaver Brooks Boiler, rated at 24.5 MMBtu/hr and installed in 2001 is subject to Regulation 7.06. The emission standard for PM is determined in accordance with Regulation 7.06, section 4.1.4 as follow:

Total Heat Input Capacity = 24.494 MMBtu/hr
PM Limit = $1.919 \times (24.5)^{-0.535} = 0.35$ lb/MMBtu

3) **SO₂**

- (a) The Cleaver Brooks Boiler, rated at 24.494 MMBtu/hr and installed in 2001 is subject to Regulation 7.06. The emission standard for SO₂ is determined in accordance with Regulation 7.06, section 5.1.1. for natural gas combustion and a heat input capacity less than 145 MMBtu/hr, the standard is 1.0 lb/MMBtu/hr
- (b) The Cleaver Brooks Boiler is subject to 40 CFR 60, Subpart Dc. However, there is no SO₂ emission standard for natural gas fired boilers in Subpart Dc.

iii. **Monitoring and Recordkeeping and Reporting**

1) **SO₂**

- (a) A one-time SO₂ compliance demonstration has been performed for the boilers, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore, there are no monitoring and record keeping requirements for this boiler with respect to PM and SO₂ emission limits for Regulation 7.06, but Federal Regulation 40 CFR 60, Subpart Dc requires records of the amount of fuel combusted during each month or total amount of fuel delivered to the property each calendar month.

e. **Emission Unit U4 – Parts Washers**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E27	Building E-1, Dolly Shop; 55 gallons no secondary reservoir	1.05, 5.00, 5.01,5.20, 5.21, 5.22, 5.23, 6.18	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 6.18 - Applies to each cold cleaner, open top vapor degreasers, and conveyORIZED degreasers that use VOC to remove soluble impurities from metal surfaces. Establishes requirements for the equipment and the operation of the equipment.
E28	Mill 6 Building; 55 gallons no secondary reservoir		
E29	Reynolds Wrap parts shop; 6 gallons no secondary reservoir		

ii. **Standards/Operating Limits**

1) **TAC**

There are no TAC emissions from this equipment

2) **VOC**

Regulation 6.18, sections 4.1 and 4.2 establish the equipment requirements and the operating requirements for cold solvent metal parts cleaners.

iii. **Monitoring and Record Keeping**

1) **VOC**

Regulation 6.18, section 4.4.2 establishes record keeping requirements for an operator of a cold cleaner using solvent

f. **Emission Unit U7 – VOC Storage Tanks (Insignificant Activities)**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E34	One (1) above ground storage tank (Tank #1)	1.05, 5.00, 5.01,5.20,	Regulation 1.05 - Establishes standards for compliance with

Emission Point	Description	Applicable Regulation	Basis for Applicability
	Capacity: 20,080 gallons	5.21, 5.22, 5.23, 7.12	emission standards and maintenance requirements Regulation 7.12 - Establishes emission standards for each storage vessel for that contains VOC that commenced construction on or after April 9, 1972, and has a storage capacity greater than 250 gallons
E35	One (1) above ground storage tank (Tank #2) Capacity: 20,080 gallons		
E78	One (1) above ground storage tank (Tank #3) Capacity: 10,000 gallons		
E79	One (1) above ground storage tank (Tank #4) Capacity: 10,000 gallons		
E36	One (1) above ground storage tank (Tank #5) Capacity: 20,080 gallons		
E37	One (1) above ground storage tank (Tank #6) Capacity: 20,080 gallons		
E80	One (1) above ground storage tank (Tank #7) Capacity: 10,000 gallons		
E81	One (1) above ground storage tank (Tank #8) Capacity: 10,000 gallons		
E82	One (1) above ground storage tank (Tank #9) Capacity: 1,000 gallons		
E83	One (1) above ground storage tank (UCON) Capacity: 5,000 gallons		
E39	One (1) above ground storage tank (Tank IS) Capacity: 5,000 gallons		
E40	One (1) above ground storage tank (Tank IN) Capacity: 5,000 gallons		
E94	One (1) above ground storage tank Capacity: 350 gallons		

Emission Point	Description	Applicable Regulation	Basis for Applicability
E41	One (1) portable Tite Capacity: 350 gallons		
E42	One (1) above ground storage tank (Tank #1) Capacity: 20,080 gallons		

ii. **Standards/Operating Limits**

1) **TAC**

TAC Emissions from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

2) **VOC**

Since these tanks are all below 40,000 gallons and contain VOCs with a true vapor pressure less than 1.5 psia, there are no applicable standards. (Regulation 7.12, section 3.3 and 3.4)

g. **Emission Unit U10 – Rotogravure Press & Thermal Oxidizer**

i. **Equipment:**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E65	One (1) Rotogravure printing/coating press with one (1) print stations and one (1) 1.54 MMBtu/hr natural gas fired dryer. Control by C11 Thermal Oxidizer	1.05, 2.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 40 CFR 64, 6.29	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 6.29 - Applies to each printing line for packaging rotogravure, publication rotogravure, specialty rotogravure, or flexographic printing.

ii. **Standards/Operating Limits**

1) **TAC**

In accordance with Regulation 5.21, section 4.3: The potential uncontrolled hourly emissions (10.4 lb/hr) of ammonia cannot exceed the lb/hr de minimis threshold limit,

however, the annual emissions could exceed the de minimis limit of 48,000 lb/yr, therefore, the source is required to meet an emission limit of 48,000 lb/yr for ammonia.

2) **VOC**

- (a) The permit contains a less than 40 tons per year VOC emission cap to avoid PSD/NSR. (Regulation 2.05)
- (b) Regulation 6.29 has specific requirements to limit the emission of VOC from an affected facility.
- (c) Reynolds Consumer Products is a CTG source and must show compliance on daily basis per Regulation 1.05, section 4.1.

iii. **Monitoring and Recordkeeping**

1) **VOC**

- (a) In accordance with Regulation 6.29 a thermal oxidizer will be used to achieve the VOC emission reduction. A Method 25A performance test was conducted on the inlet and outlet of the thermal oxidizer. An average destruction efficiency of 98.4% was achieved. The combustion temperature ranged from 1,499 °F and 1,567 °F at a line speed of 1,200 ft/min.
- (b) Compliance assurance monitoring (40 CFR 64) requires the permit to have:
 - (i) The approved monitoring approach, including the indicators to be monitored;
 - (ii) A definition of exceedances or excursions;
 - (iii) The duty to conduct monitoring;
 - (iv) Minimum data availability and averaging period requirements; and
 - (v) Milestones for testing.

In addition, the source proposed a maintenance plan for the RTO.

h. Emission Unit U11 – Emergency Firewater Pump

i. Equipment

Emission Point	Description	Applicable Regulation	Basis for Applicability
IA8 – E85	Emergency Firewater Pump, 218 Brake Horsepower	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 40 CFR 63 Subpart ZZZZ	Applies to all existing RICEs located at an area source of HAP emissions

ii. Standards/Operating Limits

1) HAP

- (a) Regulation 40 CFR 63, Subpart ZZZZ establishes emission standards for the owner or operator or manufacturer of the emergency stationary CI ICE.
- (b) This equipment is not subject to 40 CFR Part 60 Subpart IIII because it was construction in 1996.

2) TAC

TAC emission from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

iii. Monitoring and Record Keeping

1) HAP

- (a) Regulation 40 CFR 63 Subpart ZZZZ requires keeping records showing when periodic maintenance is performed and how long and why the RICE is operated.

iv. Reporting

1) HAP

Regulation 40 CFR 63 Subpart ZZZZ requires reporting each instance an operation limit is not met.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request an alternative operating scenario in its Title V application.
5. **Compliance History:**

Incid. #	Date	Regulation Violated	Settlement
0112	01/21/1997	Reg. 1.05	Settled
01708	11/21/1997	Reg. 2.03	Settled
02733	09/13/2000	Reg 6.18	Settled
06615	02/06/2014	Reg 1.07, 2.03, and 2.16	Agreed Board Order

6. **Calculation Methodology or Other Approved Method:**

Table 1 U1 Mill Group Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E1	Rolling Mill #1	C1	Emissions are calculated based on material balance.
E2	Rolling Mill #2	C8	
E3	Rolling Mill #3	C8	
E4	Rolling Mill #4	C4	
E5	Rolling Mill #5	C5	Mill #1-5 Emission Factor = actual VOC Emission during previous month (lbs)/ Metal process in Mill #1-5 during previous month (million square feet) See below for the detailed calculation methodology.
E6	Rolling Mill #6	C6, C7	Mill #6 VOC Emissions are calculated based upon oil recovered in the Busch Demister (i.e. material recovered to Busch Demister tank) and the Achenbach Scrubber tank (i.e. material recovered to the Crude Distillate Tank B7.1) Busch condenser measured VOC = (A) Scrubber measured VOC = (B) Mill #6 Fugitive VOC Emissions = (X) Scrubber Stack VOC Emissions = (Y) $(Y) = (B) \times (0.05/0.95)$ $(X) = 0.1 \times ((B)/0.95) + (A) / 0.9$ Total Mill #6 VOC Emissions = (Y)+(X)

Table 1 U1 Mill Group Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
			<p>See diagram below</p> <p>Mill #6 VOC Emission Factor = Mill #6 calculated VOC emission during previous month (lbs) / Metal processed in Mill #6 during the previous month (million square feet)</p> <p>Daily VOC Emissions = previous month's calculated Emission Factor × amount of metal processed each day during the previous month</p> <p>(Mill #6 VOC calculations are to be performed separately from other mills)</p>
<pre> graph LR Mill6[Mill 6] --> Fugitive["Fugitive (X)"] Mill6 --> BuschDemister[Busch Demister] BuschDemister --> RecoveredA["Recovered Emissions (A) Busch Demister Tank"] BuschDemister --> Scrubber[Scrubber] Scrubber --> RecoveredB["Recovered Emissions (B) Crude Distillate Tank B7.1"] Scrubber --> StackEmissions["Stack Emissions (Y)"] </pre>			
E26	Barron Still Distillation Unit	N/A	<p>Emissions are calculated based on material balance.</p> <p>VOC Emission (lb/hr) = Input to Barron Still x Emission Factor</p> <p>EF=1,000,000 x lb emissions / adjusted ft² run</p>
E105	Spent Filter Media Dumpster	N/A	Emissions are calculated based on material balance.

Table 2 U2 Oven Group Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E9	Annealing Oven #1 (Capacity: 8 MMBtu/hr)	N/A	<p>VOC Emissions (tpy) = EF Factor (8.82 lbs/MMft² annealed) × MMft² aluminum anneal/year × 1ton/2000lbs</p> <p>All ovens except for Annealing Oven #15 emission are calculated together.</p>
E10	Annealing Oven #2 Capacity: 12 MMBtu/hr	N/A	
E11	Annealing Oven #3 Capacity: 12 MMBtu/hr	N/A	
E12	Annealing Oven #4 Capacity: 12 MMBtu/hr	N/A	
E13	Annealing Oven #5	N/A	

Table 2 U2 Oven Group Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
	Capacity: 12 MMBtu/hr		
E16	Annealing Oven #21 Capacity: 7.2 MMBtu/hr	N/A	
E17	Annealing Oven #22 Capacity: 3 MMBtu/hr	N/A	
E18	Annealing Oven #24 Capacity: 3 MMBtu/hr	N/A	
E19	Annealing Oven #25	N/A	Electric – no emissions
E15	Annealing Oven #15 Capacity: 22 MMBtu/hr	C10	Uncontrolled VOC Emissions (tpy) = EF Factor (8.82 lb/MMft ² annealed) × MMft ² aluminum annealed/year × 1 ton/2000lb Controlled VOC Emissions (tpy) = Fugitive Emissions + Oxidizer Emissions Fugitive Emissions (tpy) = EF Factor (8.82 lb/MMft ² annealed) × MMft ² aluminum annealed/year × 1 ton/2000lb × fugitive emission percentage Oxidizer Emissions = [(Uncontrolled VOC Emissions (tpy) – Fugitive Emissions (tpy))] × (100- Control efficiency(%))
E20	Annealing Oven #31 Capacity: 24 MMBtu/hr	N/A	VOC Emission (tpy) = EF (8.82 lb/MMft ²) x MMft ² aluminum annealed / year x 1 ton/2000 lb (To meet non-BACT 5 tpy limit)

Additional Notes for Emission Units U1 and U2 VOC Emissions Calculations:

VOC Emissions for U1 and U2 are determined through a material balance calculation made each month. VOCs destroyed by the Oven #15 afterburner are subtracted from the results of the material balance, and oil on reroll delivered to the plant is added. The material balance calculation uses inputs, outputs, and the change in the weight of material held in the rolling mill process.

U1 & U2 VOC Emissions = VOC Inputs + Change in Weight of VOC Materials Contained in Rolling Mill Process + oil contained on incoming metal (reroll) – VOC Outputs - VOC Emissions Destroyed by Annealing Oven Afterburner

The change in weight of material held in the rolling mill process is calculated by monthly measurements of the following tanks and devices associated with the rolling mill process. Prior to measurements of these devices, the pit beneath “D” system (40,000 gallon capacity) is verified to be empty.

Tank Name	General Location	Volume (gal)	Oil Contained	Notes
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Tank Name	General Location	Volume (gal)	Oil Contained	Notes
Mill Pit 1	Beneath Mill 1	2697	Rolling Oil	Stick readings between 73 and 120 inches from bottom using 29 gal/in to measure oil volume or other approved measurement method
Mill Pit 2	Beneath Mill 2	1237	Rolling Oil	Stick readings between 3 and 53 inches from bottom using 24.5 gal/in to measure oil volume or other approved measurement method
Mill Pit 3	Beneath Mill 3	1378	Rolling Oil	Stick readings between 38 and 58 inches from bottom using 28.5 gal/in to measure oil volume or other approved measurement method
Mill Pit 4	Beneath Mill 4	3547	Rolling Oil	Stick readings between 60 and 128 inches from bottom using 30 gal/in to measure oil volume or other approved measurement method
Mill Pit 5	Beneath Mill 5	2647	Rolling Oil	Stick readings between 42 and 98 inches from bottom using 30 gal/in to measure oil volume or other approved measurement method
Pit Beneath "D" system	Mill #6	40000	Rolling Oil	Emptied before "D" system measurements
Tank #4	Tank Farm	10000	UCON 5% & Rolling Oil 95%	Hydraulic Oil Storage, Measured monthly
Tank #5	Tank Farm	20000	Reclaimed Rolling Oil	Measured monthly
Tank #6	Tank Farm	20000	Dirty Rolling Oil	Measured monthly
Tank #7	Tank Farm	10000	Water/Tramp Oils	Equipped with a gauge that reports volume of oil separate from volume of water in

Tank Name	General Location	Volume (gal)	Oil Contained	Notes
				tank, Measured monthly
Tank #8	Tank Farm	10000	Dirty Filter Rolling Oil	Measured monthly
Tank #9	Tank Farm	1000	Reclaimed UCON	Measured monthly
"D" system	Mill #6 Filter Room	12000	Rolling Oil	Clean side of tank
		12000	Rolling Oil	Dirty side of tank
		846	Rolling Oil	Body Feed tank
		2500	Rolling Oil	Verified at empty using yellow indicator light
Mill #6 Return Tank	Under Mill #6	5000	Rolling Oil	Measured monthly
Rectified Oil Tank B8.1	Mill 6 Scrubber Room	3304	Reclaimed Rolling Oil	Measured monthly
Waste Oil Tank B9.1	Mill 6 Scrubber Room	659	UCON	Still Bottoms, Measured monthly
Oil Storage B1.1	Mill 6 Scrubber Room	3936	Dirty Rolling Oil	Measured monthly
M6 Busch Demister	Mill 6 Scrubber Room	1750	Dirty Rolling Oil	Measured monthly
M6 Auxiliary Hyd. Tank	Mill 6 Scrubber Room	730	UCON 5% & Rolling Oil 95%	Measured monthly
B7.1 Crude Distillate Tank	Mill 6 Scrubber Room	3963	Dirty Rolling Oil	Measured monthly
"A" System	Filter Room	3401	Rolling Oil	System Clean tank, Measured monthly
		4895	Rolling Oil	System Dirty tank, Measured monthly
		250	Rolling Oil	Body Feed tank, Measured monthly
"B" System	Filter Room	2959	Rolling Oil	System Clean tank, Measured monthly
		3676	Rolling Oil	System Dirty tank, Measured monthly
		250	Rolling Oil	Body Feed tank, Measured monthly
"C" System	Filter Room	6121	Rolling Oil	System Clean tank, Measured monthly
		7738	Rolling Oil	System Dirty tank, Measured monthly
		250	Rolling Oil	Body Feed tank, Measured monthly
M2/M3 HOS Tank	Filter Room	2500	Rolling Oil	
Mill 1 Hyd. Unit	Drive Aisle behind Mill 1	500	UCON & Rolling Oil	
Mill 1 Lube Oil	Under Mill 1 Drives	500	UCON	
Mill 2 Hyd. Unit	Drive Aisle behind Mill 2	450	UCON & Rolling Oil	
Mill 2 Lube Oil	SE corner of Mill 2	500	UCON	
Mill 3 Lube Oil	In Floor Mill 3 Drive Aisle	400	UCON	
Mill 3 Hyd. Unit	Drive Aisle behind Mill 3	500	UCON & Rolling Oil	

Tank Name	General Location	Volume (gal)	Oil Contained	Notes
Mill 4 Lube Oil	In Floor Mill 4 Drive Aisle	450	UCON	
Mill 4 Hyd. Unit	Drive Aisle behind Mill 4	500	UCON & Rolling Oil	
Mill 5 Hyd. Unit	Drive Aisle behind Mill 5	450	UCON & Rolling Oil	
Mill 5 Lube Oil	Below Mill 5 drive	500	UCON	
M6 Main Drive Lube system	Mill 6 Scrubber Room	300	UCON	
M6 Hyd. Makeup Tank	Mill 6 Scrubber Room	300	Rolling Oil	
M6 High Pressure Hyd. Tank	Mill 6 Scrubber Room	300	UCON & Rolling Oil	
UCON 220 Storage Tote	Mobile Tank Drive Aisle behind Mill 5	300	UCON	

On the first day of each month, unless that day is Saturday, Sunday or a Holiday, in which case on the next non-holiday week day following the first day of the month, the amount of material held in these devices is measured, recorded and converted to pounds of material. The total quantity is compared to the weight measured on the prior month's measurement date to calculate a change in the weight of materials held within the rolling mill process.

VOC Inputs are tracked in pounds as the additions occur. Tanks 1 through 9 are equipped with gauges. Inputs include:

- Virgin Rolling Oil added to the mill systems that is delivered from storage (Tanks 1, 2 and 3)
- UCON hydraulic oil added to the mill system
- Coolant additives added from drums or totes
- Other oils added from drums or totes
- Recycled coolant received from off-site reclaimers

Each month the total weight of all inputs during the month is calculated.

VOC Outputs also are tracked in pounds as they occur. Outputs include:

- Coolant and oiler present in Schneider filter media and other filter media shipped off-site for disposal
- Coolant and oil shipped off-site for reclamation (from Tanks 6 and 7)
- Coolant and oil present in mixtures of coolant, oil, sludge and/or water shipped off site for disposal (cleanout projects and Tank 7)
- Coolant and oil present on separator scrap shipped off-site to be recycled (0.16% of scrap weight)
- Coolant and oil present on mill scrap shipped off-site to be recycled (2.19% of scrap weight)
- Spills and other unique events as they occur

Each month the total weight of all outputs during the month is calculated.

VOC Outputs also are tracked in pounds as they occur. Outputs include:

- Coolant and oiler present in Schneider filter media and other filter media shipped off-site for disposal
- Coolant and oil shipped off-site for reclamation (from Tanks 6 and 7)
- Coolant and oil present in mixtures of coolant, oil, sludge and/or water shipped off site for disposal (cleanout projects and Tank 7)
- Coolant and oil present on separator scrap shipped off-site to be recycled (0.16% of scrap weight)
- Coolant and oil present on mill scrap shipped off-site to be recycled (2.19% of scrap weight)
- Spills and other unique events as they occur

Each month the total weight of all outputs during the month is calculated.

Units not measured: Total Capacity of units not measured (2,129 gallons)

Do not measure:

- Scrubber Towers (rolling oil portion of oil is less than 60 gallons)
- Tanks in the table below

Tank Name	General Location	Volume (gal)	Oil Contained
Recovery Tank on Vac Skid (#8)	Tank Farm	50	Rolling Oil
Vacuum Tank on Vac Skid (#6)	Thank Farm	50	Rolling Oil
Deep Vac Cooling Reservoir on Vac Skd (#10)	Tank Farm	10	Rolling Oil
Cold POT Reservoir on Vac Skid (#7)	Tank Farm	1	Rolling Oil
Vac Cooling Tank on Vac Skid (#13)	Tank Farm	1	Recycled Magiesol
(Oil Mist) Oil/Air Main Lube Station	Mill 6 Scrubber Room	125	Mobil DTE Oil AA
6.1 N	Mill 6 Scrubber Room	25	Rolling Oil
6.1 S	Mill 6 Scrubber Room	25	Rolling Oil
Degasification Tank	Mill 6 Scrubber Room	50	Rolling Oil
K 5.1	Mill 6 Scrubber Room	10	Rolling Oil
Vacuum Skid Tank	Mill 6 Scrubber Room	20	Rolling Oil
Supplies Aux. Hyd. Tank (Behind Busch Tank)	Mill 6 Scrubber Room	250	Magiesol
Mill 2 Demister Tank	Drive Aisle behind Mill 2	20	Dirty Rolling Oil
Mill 2 Gear Box Lube Oil	Behind Mill2 Main Drive	100	AW68
Demister Mill #3	Behind Mill 3 drive Aisle	20	Dirty Rolling Oil
Mill 4 Demister	Drive Aisle behind Mill 4	20	Dirty Rolling Oil
Mill 5 Barrel Lube Tank	Drive Aisle behind Mill 5	50	Chevron 6453 NS
VE-203 → flash separator	Mills 2&3 Scrubber	120	Rolling & Wash Oil
VE-207 →Reboiler	Mills2&3 Scrubber	50	Rolling & Wash Oil

Tank Name	General Location	Volume (gal)	Oil Contained
VE-206 → Distillation Column	Mills 2&3 Scrubber	250	Rolling & Wash Oil
HX-208 → Overheads Condenser	Mills 2&3 Scrubber	150	Rolling & Wash Oil
Fulton Thermal Fluid Heater	Mills 2&3 Scrubber	132	Multiherm PG-1
Mills 2 & 3 Exhaust Duct Tank	EL mezzanine NE of office	50	Dirty Rolling Oil
Mill 1 Demister Tank	EL mezzanine next to Mill 1 demister	50	Dirty Rolling Oil
Chevron 6452NS High Pressure Hyd Oil Prefilter Unit	Mill 6 Scrubber Room	250	Chevron 6452 NS
Chevron 6452 NS High Pressure Hyd. System	Mill 6 Scrubber Room	250	Chevron 6452 BS

Table 3 U3 Boiler			
Emission Point ID	Description	Control Device	Calculation Method
E38	One (1) 24.5 MMBtu/hr natural gas boiler, Cleaver Brooks	N/A	Use Emission Factors from AP-42, Chapter 1.4: Natural Gas Combustion to calculate emissions.

Table 4 U4 Parts Washers			
Emission Point ID	Description	Control Device	Calculation Method
E27	Building E-1, Dolly Shop; 55 gallons no secondary reservoir	N/A	Use Emission Factors from AP-42, Chapter 4.6.1.1 for Cold Cleaners, maintenance to calculate emissions.
E28	Mill 6 Building; 65 gallons no secondary reservoir	N/A	
E29	Reynolds Wrap parts shop; 6 gallons no secondary reservoir	N/A	

Table 5 U7 VOC Storage Tank Group (Insignificant Activities)			
Emission Point ID	Description	Control Device	Calculation Method
E34	One (1) above ground storage tank (Tank #1) Capacity: 20,080 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: 40% of virgin Rolling Oil use (All virgin Rolling Oil goes to Tanks #1, 2 and 3) Diameter: 10.5 ft Length: 31 ft Volume: 20,080 gallons Contents: Virgin Rolling Oil

Table 5 U7 VOC Storage Tank Group (Insignificant Activities)			
Emission Point ID	Description	Control Device	Calculation Method
E35	One (1) above ground storage tank (Tank #2) Capacity: 20,080 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: 40% of virgin Rolling Oil use (All virgin Rolling Oil goes to Tanks #1, 2 and 3) Diameter: 10.5 ft Length: 31 ft Volume: 20,080 gallons Contents: Virgin Rolling Oil
E78	One (1) above ground storage tank (Tank #3) Capacity: 10,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: 20% of virgin Rolling Oil use (All virgin Rolling Oil goes to Tanks #1, 2 and 3) Diameter: 10.5 ft Length: 15.75 ft Volume: 10,000 gallons Contents: Virgin Rolling Oil
E79	One (1) above ground storage tank (Tank #4) Capacity: 10,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: To mill hydraulic tanks as needed (estimate: 150 gal/ day) Diameter: 10.5 ft Length: 15.75 ft Volume: 10,000 gallons Contents: hydraulic oil mix
E36	One (1) above ground storage tank (Tank #5) Capacity: 20,080 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: from tank farm still and rectification Recycled Throughput = Rolling Oil from Tank Farm Still + Rolling Oil in from B8.1 rectification Tank Diameter: 10.5 ft Length: 31 ft Volume: 20,080 gallons Contents: recycled oil
E37	One (1) above ground storage tank (Tank #6) Capacity: 20,080 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: to filter and Tank 8

Table 5 U7 VOC Storage Tank Group (Insignificant Activities)			
Emission Point ID	Description	Control Device	Calculation Method
			Dirty Magiesol = Tank 9 throughput to Tank farm Still Diameter: 10.5 ft Length: 31 ft Volume: 20,080 gallons Contents: Dirty Rolling Oil
E80	One (1) above ground storage tank (Tank #7) Capacity: 10,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Oil shipped off-site for disposal and/or reclamation Diameter: 10.5 ft Length: 15375 ft Volume: 10,000 gallons Contents: Oily water for disposal
E81	One (1) above ground storage tank (Tank #8) Capacity: 10,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data: Tank farm still Diameter: 10.5 ft Length: 15.75 ft Volume: 10,000 gallons Contents: Rolling Oil to Tank farm still
E82	One (1) above ground storage tank (Tank #9) Capacity: 1,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: Tank farm still, bottoms flow meter Diameter: 4.7 ft Length: 2.67 ft Volume: 1,000 gallons Contents: Rolling Oil to Tank farm still
E83	One (1) above ground storage tank (UCON) Capacity: 5,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Throughput data source: purchasing records Diameter: 8 ft Length: 13.3 ft Volume: 5,000 gallons Contents: Virgin UCON
E39	One (1) above ground storage tank (Tank IS) Capacity: 5,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses.

Table 5 U7 VOC Storage Tank Group (Insignificant Activities)			
Emission Point ID	Description	Control Device	Calculation Method
			Diameter: 5 ft Height: 10 ft Volume: 5,000 gallons Contents: Core Adhesive
E40	One (1) above ground storage tank (Tank IN) Capacity: 5,000 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Diameter: 5 ft Height: 10 ft Volume: 5,000 gallons Contents: Core Adhesive
E41	One (1) above ground storage tank Capacity: 350 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Diameter: 3 ft Length: 5.5 ft Volume: 350 gallons Contents: Non-Stick Coating
E42	One (1) portable Tote Capacity: 350 gallons	N/A	Emissions accounted for in the working losses for the storage tanks using AP-42 evaporative losses. Diameter: 3 ft Length: 5.5 ft Volume: 350 gallons Contents: Non-Stick Coating

Table 6 U10 Rotogravure Press & Thermal Oxidizer Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E65	One (1) Rotogravure printing/coating press with one (1) print station. 1,200 ft/min machine speed. 6.167 feet substrate width. One (1) 1.54 MMBtu/hr natural gas fired dryer.	C11	Uncontrolled VOC emissions may be calculated according to the following methodology: $VOC (lb) = Coating\ used\ (gal) \times Density\ (lb/gal) \times VOC\ content\ (\%)$ or $VOC (lb) = Coating\ used\ (gal) \times VOC\ content\ (lb/gal)$ Controlled VOC emissions may be calculated according to the following methodology: $VOC (lb) = Coating\ used\ (gal) \times Density\ (lb/gal) \times VOC\ content\ (\%) \times [100 - (Capture\ Efficiency\ (\%) \times Destruction\ Efficiency\ (\%))]$ or $VOC (lb) = Coating\ used\ (gal) \times VOC\ content\ (lb/gal) \times [100 - (Capture$

Table 6 U10 Rotogravure Press & Thermal Oxidizer Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
			Efficiency (%) × Destruction Efficiency (%)

Table 7 U11 Emergency Firewater Pump (Insignificant Activity)			
Emission Point ID	Description	Control Device	Calculation Method
E85	Emergency Firewater Pump, Capacity: 218 HP	N/A	Use Emission Factors from AP-42, Chapter 3 Stationary Internal Combustion Sources, Table 3.3.1 for Uncontrolled Diesel Industrial Engines to calculate emissions

Table 8 IA1 Indirect Heat Exchangers			
Emission Point ID	Description	Control Device	Calculation Method
E67	One (1) 2.1 MMBtu/hr natural gas boiler, Fulton Fuel Fired Steam Boiler in Mill 6 building	N/A	Emissions calculated using Emission Factors from AP-42, Chapter 1 External Combustion Source, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4
E84	One (1) 7.328 MMBtu/hr natural gas boiler, York Shipley Boiler in the Reynolds Wrap Building	N/A	
E86	One (1) 1.674 MMBtu/hr natural gas boiler, Fulton Steam Solutions Boiler in Mill 6 building	N/A	

Table 9 IA2 Core Winders Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E43-E53	Eleven (11) Core Winders	N/A	<p>VOC Emissions (tpy) = (gallons adhesive/year) × adhesive density (lb/gal) × VOC content (%) × 1ton/2000lbs</p> <p>(To meet non-BACT 5 tpy limit)</p> <p>PM Emissions (tpy) = [(# of cores/yr) × (# cuts/core) × (blade thickness) × (core weight in lbs)]/2000</p>

Table 10 IA3 Ink Jet Printers Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E56	Ink Jet Printer, Line W4	N/A	<p>VOC Emissions (tpy) = (gal ink/year) × (specific gravity of ink) × density (lb/gal) × VOC Content (%) × 1ton/2000lb</p> <p>(To meet non-BACT 5 tpy limit)</p>
E57	Ink Jet Printer, Line W5 Foxjet Solo 100 Printer	N/A	
E58	Ink Jet Printer, RK 3 Videojet 2350	N/A	
E59	Ink Jet Printer, RK 4 Videojet 2350	N/A	
E60	Ink Jet Printer, Line 7 (L7) Videojet Model #1520	N/A	

Table 10 IA3 Ink Jet Printers Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E61	Ink Jet Printer, Line 8 (L8) Videojet Model #1520	N/A	
E62	Ink Jet Printer, Line 6 (L6)	N/A	
E89	Backup Ink Jet Printer, Warehouse Line 1 Foxjet Solo Series 45	N/A	
E90	Ink Jet Printer, Interfold Line 3 Videojet Model 1520	N/A	
E91	Ink Jet Printer, Interfold Line 4 Videojet Model 1520	N/A	

Table 11 IA4 Line Carton Gluers Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E72	Line 1 Cartoner (RW #1)	N/A	VOC Emissions (tpy) = Usage (lbs of glue/year) × glue density (lb/gal) × VOC content (%) × 1 ton/2000lb (To meet non-BACT 5 tpy limit)
E73	Line 2 Cartoner (RW #2)	N/A	
E74	Line 3 Cartoner (RW #3)	N/A	
E75	Line 4 Cartoner (RW #4)	N/A	
E76	Line 5 Cartoner (RW #5)	N/A	
E77	Line 6 Cartoner (RW #6)	N/A	

Table 12 IA5 Rotomatic Dishwasher Emission Points			
Emission Point ID	Description	Control Device	Calculation Method
E87	Better Engineering Parts Washer (VOC Emissions only from degreaser used after cleaning)	N/A	$\text{VOC Emissions (lb/yr)} = [\text{WD-40 Usage (gal/yr)} \times \text{Density of product (lb/gal)} \times \text{VOC Content}] + [\text{chlor-free usage (gal/yr)} \times \text{density (lb/gal)} \times \text{VOC content}]$ (to meet non-BACT 5 tpy limit)
E106	Various portable containers from 1-330 gallons of paints, coatings, boiler treatment chemicals, lubes, adhesives, solvents and wastes	N/A	No Emissions – Closed containers

Table 13 IA6 Roll Grinders			
Emission Point ID	Description	Control Device	Calculation Method
E88	Roll Grinders	N/A	$\text{VOC Emissions (tpy)} = \text{Usage (gal/yr)} \times \text{VOC Content (\%)} \times \text{Density (lb/gal)} \times (1 \text{ ton}/2000 \text{ lbs})$

Table 14 IA7 Diesel Storage Tanks			
Emission Point ID	Description	Control Device	Calculation Method
E96	Diesel Tank 1	N/A	Emissions accounted for in the working

Table 14 IA7 Diesel Storage Tanks			
Emission Point ID	Description	Control Device	Calculation Method
	Capacity: 500 gallons		losses for the storage tanks using AP-42 evaporative losses. Diameter: for E96, 4 ft; for E97-98, 3 ft Length: 5.5 ft Volume: for E96 500 gal, for E97-98 300 gal Contents: No. 2 Diesel Fuel
E97	Diesel Tank 2 Capacity: 300 gallons	N/A	
E98	Diesel Emergency Fire Pump Tank Capacity: 300 gallons	N/A	

Table 15 IA8 Cooling Towers			
Emission Point ID	Description	Control Device	Calculation Method
E99	Cooling Tower for Mill 1 Capacity: 2695 gpm	N/A	PM10 Emissions (tpy) = Volume (gal/min) × tds/10e6 × ndrift (0.02%) × water density (8.34 lb/gal) × 60 min/hr × hours of operation × (1 ton/2000lb)
E100	Cooling Tower for Mill 4 Capacity: 2000 gpm	N/A	
E101	Cooling Tower for Mill 6 Capacity: 2000 gpm	N/A	
E102	Cooling Tower for Furnace 1 Capacity: 1050 gpm	N/A	
E103	Cooling Tower for Furnace 31 Capacity: 1000 gpm	N/A	
E104	Cooling Tower for Reynolds Wrap Room, Capacity: 1512 gpm	N/A	

Table 16 IA9 Roll Grinders			
Emission Point ID	Description	Control Device	Calculation Method
E105	Abrasive blast cabinet	N/A	PM Emissions (tpy) = Abrasive Blast Cabinet capacity (60 lbs/hr) × Hours of operation (hr/yr) × Emission Factor (lb/1000 lbs) × (1 ton/2000 lbs)

Table 17 Other IA Equipment			
Emission Point ID	Description	Control Device	Calculation Method
N/A	Indirect Fired Heat Exchangers ≤ 1 MMBtu: One (1) ThermoShield Heater (0.75 MMBtu/hr) Two (2) Modine Heaters (0.3 MMBtu/hr) Three (3) Reznor Heaters (0.4 MMBtu/hr) Five (5) Can Heates (0.865 MMBtu/hr)	N/A	Emission Factors from AP-42, Chapter 1 External Combustion Source, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4

Table 17 Other IA Equipment			
Emission Point ID	Description	Control Device	Calculation Method
	Two (2) Weather-Rite Heaters (0.385 MMBtu/hr) Four (4) Hastings Heaters (0.304 MMBtu/hr) One (1) Natural Gas Heater (0.304 MMBtu/hr) One (1) Weather-Rite Heater (0.35 MMBtu/hr) One (1) Temprite Heater (1 MMBtu/hr) One (1) Hotsy Heater (0.35 MMBtu/hr)		
N/A	Direct Fired Heat Exchangers: Two (2) Cambridge S2200 Heaters (2.2 MMBtu/hr each) One (1) Cambridge S1200 Heater (1.2 MMBtu/hr) One (1) Cambridge M136 Heater (4.938 MMBtu/hr)	N/A	Emission Factors from AP-42, Chapter 1 External Combustion Source, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4
N/A	All pressurized VOC Storage Vessels (propane)	N/A	No emissions – pressurized tanks
N/A	Four (4) Dust collectors located in doors to collect fugitive dust from core winding, less than 1 tpy	N/A	Emission are accounted for in Core Winder calculations

7. Insignificant Activities¹

Equipment	Quantity	PTE (tpy)	Regulation Basis
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¹ The source also has Trivial Activities pursuant to Regulation 2.16 including: maintenance woodworking activity, maintenance welding equipment, Ultrasonic Filter cleaner for Mill #6 that does not emit any air pollutants, and mobile combustion engines.

Equipment	Quantity	PTE (tpy)	Regulation Basis
Indirect heat exchangers >1 and < 10 MMBtu/hr: (Emission Unit IA1)	3		Regulation 2.16, Section 1.23
IA1 York Shipley (7.328 MMBtu/hr)	1	3.15 NO _x	
IA1 Fulton (2.1 MMBtu/hr)	1	0.90 NO _x	
IA1 Fulton (1.674 MMBtu/hr)	1	0.70 NO _x	
Indirect Heat Exchangers for building heat ≤1 MMBtu/hr:	21		Regulation 2.16, Section 1.23
ThermoShield Heater (0.75 MMBtu/hr)	1	0.32 NO _x	
Modine Heater (0.3 MMBtu/hr)	2	0.26 NO _x	
Reznor Heater (0.3 MMBtu/hr)	3	0.51 NO _x	
Reznor Heater (0.4 MMBtu/hr)	5	1.85 NO _x	
Can Heater (0.865 MMBtu/hr)	2	0.34 NO _x	
Weather-Rite Heater (0.385 MMBtu/hr)	4	0.52 NO _x	
Hastings Heater (0.304 MMBtu/hr)	1	0.13 NO _x	
Natural Gas Heater (0.304 MMBtu/hr)	1	0.15 NO _x	
Weather-Rite Heater (0.35 MMBtu/hr)	1	0.43 NO _x	
Temprite Heater (1 MMBtu/hr)	1	0.15 NO _x	
Hotsy Heater (0.35 MMBtu/hr)	1		
Direct-Fired Heat Exchangers	4		Regulation 2.16, Section 1.23
Cambridge S2200 Heaters (2.2 MMBtu/hr)	2	1.88 NO _x	
Cambridge S1200 Heater (1.2 MMBtu/hr)	1	0.52 NO _x	
Cambridge M136 Heater (4.938 MMBtu/hr)	1	4.24 NO _x	
Emergency Firewater Pump, Capacity 218 HP (Emission Unit U11)	1	1.69 NO _x	Regulation 2.16, Section 1.23
Storage Tank – Diesel or fuel oil (not for resale) (Emission Unit IA7)	3	0.0004 VOC	Regulation 2.16, Section 1.23
All pressurized VOC Storage Vessels (propane)	<100	N/A	Regulation 2.16, Section 1.23
Core Winders equipped with horizontal baler and Dust Collector (Emission Unit IA2)	11	0.26 VOC 0.62 PM	Regulation 2.16, Section 1.23
Cooling Towers: (Emission Unit IA8)	6		Regulation 2.16, Section 1.23
Mill 1		1.18 PM	
Mill 4		0.88 PM	
Mill 6		0.88 PM	
Furnace 1		0.46 PM	
Furnace 31		0.44 PM	
Reynolds Wrap		0.66 PM	
Ink Jet Printers: (Emission Unit IA3)	11		Regulation 2.16, Section 1.23
Line W3		0.029 VOC	
Line W5, Foxjet Solo Series 45		0.002 VOC	
RK 3, Videojet Model #2350		0.001 VOC	

Equipment	Quantity	PTE (tpy)	Regulation Basis
RK 4, Videojet Model #2350 Line 7 (L7), Videojet, Model #1520 Line 8 (L8), Videojet, Model #1520 Line 6 (L6), Ink Jet Printer, Foxjet Solo Series 45 Warehouse, Ink Jet Printer, Foxjet Solo Series 45 Backup, Warehouse Line 1, Foxjet Solo Series 45 RK 3, Videojet Model #1520 RK 4, Videojet Model #1520		0.001 VOC 0.048 VOC 0.048 VOC 0.13 VOC 0.13 VOC 0.001 VOC 0.071 VOC 0.071 VOC	
Line Cartoner Gluers: (Emission Unit IA4) Line 1 (RW#1) Line 2 (RW#2) Line 3 (RW#3) Line 4 (RW#4) Line 5 (RW#5) Line 6 (RW#6)	6	0.013 VOC 0.015 VOC 0.015 VOC 0.018 VOC 0.005 VOC 0.015 VOC	Regulation 2.16, Section 1.23
Better Engineering Dishwasher (used for cleaning parts but does not contain VOC, except in the degreaser used on parts after, Emission Unit IA5)	1	0.07 VOC	Regulation 2.16, Section 1.23
Roll Grinders (Emission Unit IA6)	3	0.073 VOC total	Regulation 2.16, Section 1.23
VOC Storage tanks (Emission Unit U7)	14	0.01 VOC total	Regulation 2.16, Section 1.23
Dust collectors located in doors to collect fugitive dust from core winding, less than 1 tpy (Emission Unit IA2)	10	0.09 PM10 total	Regulation 2.16, Section 1.23
Spent Filter Media Dumpster (Emission Unit U1)	1	4.76 VOC	Regulation 2.16, Section 1.23
Various portable containers from 1-330 gallons of paints, coatings, boiler treatment chemicals, lubes, adhesives, solvents and wastes (Emission Unit IA5)	>100	closed-no emissions	Regulation 2.16, Section 1.23
Mill Pits 1 – 5 (Emission Unit U1)	5	N/A	Regulation 2,16, Section 1.23
Mill #6 return Tank (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
Rectified Oil Tank b8.1 (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
Waste Oil Tank B9.1 (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
Oil Storage B1.1 (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
M6 Busch Demister (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23

Equipment	Quantity	PTE (tpy)	Regulation Basis
M6 Auxiliary Hyd. Tank (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
B7.1 Crude Distillate Tank (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
M2/M3 HOS Tank (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
Mill 1 – 5 Hyd. Unit (Emission Unit U1)	5	N/A	Regulation 2,16, Section 1.23
Mill 1 – 5 Lube Oil (Emission Unit U1)	5	N/A	Regulation 2,16, Section 1.23
M6 Main Drive Lube System (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
UCONN 220 Storage Tote (Emission Unit U1)	1	N/A	Regulation 2,16, Section 1.23
“A”, “B”, “C”, and “D” Filter Systems (Emission Unit U1)	4	N/A	Regulation 2,16, Section 1.23
Abrasive blast cabinet (Emission Unit IA9)	1	1.8 PM10	Regulation 2.16, Section 1.23

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.
- 3) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16 section 4.3.5.3.6.
- 6) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) to be reported on the annual emission inventory.
- 7) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Basis of Regulation Applicability for IA units

a. **Emission Unit IA1 – Indirect Heat Exchangers >1 and <10 MMBtu/hr**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E67	One (1) 2.1 MMBtu/hr natural gas boiler, Fulton Fuel Fired Steam Boiler in Mill 6 building	5.00, 5.01, 5.20, .521, 5.22, 5.23, 7.06	Establishes emission standards for indirect heat exchangers constructed after April 9, 1972 with a heat input capacity greater than 1 MMBtu/hr and less than 250 MMBtu/hr
E84	One (1) 7.328 MMBtu/hr natural gas boiler, York Shipley Boiler in the Reynolds Wrap Building		
E86	One (1) 1.674 MMBtu/hr natural gas boiler, Fulton Steam Solutions Boiler in Mill 6 building		

ii. **Standards/Operating Limits**

1) **Opacity**

The indirect heat exchangers are subject to the opacity standards in accordance with Regulation 7.06, section 4.2.

2) **PM**

(a) The emission standards for PM are determined in accordance with Regulation 7.06, section 4.1.4 as follows:

For the Fulton Fired Boiler installed in 2007:
 Total Heat Capacity = 26.6 MMBtu/hr
 PM Limit = $1.919 \times (26.6)^{-0.535} = 0.33 \text{ lb/MMBtu}$

For the three (3) Heaters installed in 2010:
 Total Heat Capacity = 34.94 MMBtu/hr
 PM Limit = $1.919 \times (34.94)^{-0.535} = 0.29 \text{ lb/MMBtu}$

For the York Shipley Boiler installed in 2011:
 Total Heat Capacity = 42.27 MMBtu/hr
 PM Limit = $1.919 \times (42.27)^{-0.535} = 0.26 \text{ lb/MMBtu}$

For the Fulton Steam Solutions Boiler installed in 2015:

Total Heat Capacity = 43.94 MMBtu/hr
PM Limit = $1.919 \times (43.94)^{-0.535} = 0.25 \text{ lb/MMBtu}$

3) **SO₂**

- (a) The emission standards for SO₂ are determined in accordance with Regulation 7.06, section 5.1.1. For natural gas combustion and that input capacity less than 145 MMBtu/hr, the standard is 1 lb/MMBtu.
- (b) The indirect heat exchangers are not subject to 40 CFR 60, Subpart Dc because they are all individually less than 10 MMBtu/hr

4) **TAC**

The TAC emissions from the combustion of natural gas are considered to be “*de minimis* emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.21, section 2.7)

b. **Emission Unit IA2 – Core Winders**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E43-E53	Eleven (11) Core Winders	1.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.08, 7.25	<p>Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements</p> <p>Regulation 7.08 – Establishes emission standards for equipment installed after September 1, 1976 with PM emissions</p> <p>Regulation 7.25 – Establishes standards for affected facilities constructed after June 13, 1979 for VOC. The core winders use and adhesive which contains VOC, therefore is subject to Regulation 7.25.</p>

ii. **Standards/Operating Limits**

1) **Opacity**

Regulation 7.08 section 3.1.1 limits the visible emissions to twenty percent (20%) opacity.

2) **PM**

The core winders are subject to Regulation 7.08, section 3.1.1. The emission standard, per winder, for PM is based upon the process weight rate, which is less than 1,000 lb/hr. Therefore the PM limit is 2.34 lb/hr.

3) **TAC**

TAC Emissions from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

4) **VOC**

See plantwide section for non-BACT Regulation 7.25 requirements.

c. **Emission Unit IA3 – Carton Labeling Inkjet Printers**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E56	Ink Jet Printer, Line W4	1.05,5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 7.25 - Establishes standards for affected facilities constructed after June 13, 1979 for VOC.
E57	Ink Jet Printer, Line W5 Foxjet Solo 100 Printer		
E58	Ink Jet Printer, RK 3 Videojet 2350		
E59	Ink Jet Printer, RK 4 Videojet 2350		
E60	Ink Jet Printer, Line 7 (L7) Videojet Model 1520		
E61	Ink Jet Printer, Line 8 (L8) Videojet Model 1520		
E62	Ink Jet Printer, Line 6 (L6), Foxjet Solo Series 45		
E63	Ink Jet Printer, Warehouse, Foxjet Solo Series 45		
E89	Backup Ink Jet Printer, Warehouse Line 1 Foxjet Solo Series 45		
E90	Ink Jet Printer, Interfold Line 3 Videojet Model 1520		
E91	Ink Jet Printer, Interfold Line 4 Videojet Model 1520		

ii. **Standards/Operating Limits**

1) **TAC**

TAC Emissions from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

2) **VOC**

See plantwide section for non-BACT Regulation 7.25 requirements.

d. **Emission Unit IA4 – Line Carton Gluers**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E72	Line 1 Cartoner (RW #1)	1.05,5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 6.24 - Established standards for affected facility using any organic materials which was in being prior to June 13, 1979
E73	Line 2 Cartoner (RW #2)		
E74	Line 3 Cartoner (RW #3)	1.05,5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements
E75	Line 4 Cartoner (RW #4)		
E76	Line 5 Cartoner (RW #5)		
E77	Line 6 Cartoner (RW #6)		Regulation 7.25 - Establishes standards for affected facilities constructed after June 13, 1979 for VOC.

ii. **Standards/Operating Limits**

1) **TAC**

TAC Emissions from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

2) **VOC**

(a) Regulation 6.24 limits the pound per hour and pound per day emission of Class III Solvents. Class II Solvent means any organic material which is not classified as a Class I or Class II solvent.

(b) See plantwide section for non-BACT Regulation 7.25 requirements.

e. **Emission Unit IA5 – Better Engineering Dishwasher**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E87	Better Engineering Parts Washer (VOC Emissions only from degreaser used after cleaning)	1.05,5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.25	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 7.25 - Establishes standards for affected facilities constructed after June 13, 1979 for VOC.

ii. **Standards/Operating Limits**

1) **TAC**

TAC Emissions from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

2) **VOC**

See plantwide section for non-BACT Regulation 7.25 requirements.

f. **Emission Unit IA6 – Roll Grinders**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E88	Roll Grinders	1.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 6.24	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 6.24 Establishes standards for any affected facility using any organic materials which was in being prior to June 13, 1979

ii. **Standards/Operating Limits**

1) **TAC**

TAC Emissions from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

2) **VOC**

Regulation 6.24 limits the pound per hour and pound per day emission of Class III Solvents. Class III Solvent means any organic material which is not classified as a Class I or a Class II solvent.

g. **Emission Unit IA7 – Diesel Storage Tanks**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Basis for Applicability
E96	Diesel Tank 1 Capacity: 500 gallons	1.05, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.12	Regulation 1.05 - Establishes standards for compliance with emission standards and maintenance requirements Regulation 7.12 - Establishes emission standards for each storage vessel for that contains VOC that commenced construction on or after April 9, 1972, and has a storage capacity greater than 250 gallons
E97	Diesel Tank 2 Capacity: 300 gallons		
E98	Diesel Emergency Fire Pump Tank Capacity: 300 gallons		

ii. **Standards/Operating Limits**

1) **TAC**

TAC Emissions from Insignificant Activities are considered to be de minimis per Regulation 5.21, section 2.3.

2) **VOC**

Since these tanks are all below 40,000 gallons and contain VOCs with a true vapor pressure less than 1.5 psia, there are no applicable standards in Regulation 7.12.

h. Emission Unit IA8 – Cooling Towers

i. Equipment

Emission Point	Description	Applicable Regulation	Basis for Applicability
E99	Cooling Tower for Mill 1 Capacity: 2695 gpm	7.08	Establishes emission standards for equipment installed after September 1, 1976 with PM emissions
E100	Cooling Tower for Mill 4 Capacity: 2000 gpm		
E101	Cooling Tower for Mill 6 Capacity: 2000 gpm		
E102	Cooling Tower for Furnace 1 Capacity: 1050 gpm		
E103	Cooling Tower for Furnace 31 Capacity: 1000 gpm		
E104	Cooling Tower for Reynolds Wrap Room, Capacity: 1512 gpm		

ii. Standards/Operating Limits

1) Opacity

Regulation 7.08 section 3.1.1 limits the visible emissions to twenty percent (20%) opacity.

2) PM

The Cooling Towers are subject to Regulation 7.08, section 3.1.1. The emission standard for PM is based upon the process weight rate, which is less than 1,000 lb/hr. Therefore the PM limit is 2.34 lb/hr.

i. Emission Unit IA9 – Abrasive Blast Cabinet

i. Equipment

Emission Point	Description	Applicable Regulation	Basis for Applicability
E105	One (1) abrasive blast cabinet, make Trinco Master, model	5.00, 5.01, 5.20, 5.21,	Establishes emission standards for equipment installed after September

Emission Point	Description	Applicable Regulation	Basis for Applicability
	36/BP	5.22, 5.23, 7.08	1, 1976 with PM emissions

ii. **Standards/Operating Limits**

1) **Opacity**

Regulation 7.08 section 3.1.1 limits the visible emissions to twenty percent (20%) opacity.

2) **PM**

The Abrasive blast cabinet is subject to Regulation 7.08, section 3.1.1. The emission standard for PM is based upon the process weight rate, which is less than 1,000 lb/hr. Therefore the PM limit is 2.34 lb/hr.