



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



## Title V Operating Permit

Permit No.: 158-97-TV (R2)

Plant ID: 0186

Effective Date: 6/30/2012

Expiration Date: 6/30/2017

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

**Owner:** Reynolds Consumer Products LLC  
**Source:** Reynolds Consumer Products LLC – Louisville Foil Plant  
2827 Hale Avenue  
Louisville, KY 40211

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Permit Writer: Emily Tyler

Administratively Complete: 12/3/2005

Public Notice Date: 2/11/2012, 4/14/2012

Proposed Permit Date: 4/15/2012

*Paul G. And*

Air Pollution Control Officer  
April 27, 2016

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**Title V Permit Revisions/Changes**

<b>Revision No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Page No.</b>	<b>Description</b>
N/A	4/5/2001	12/10/2000	Initial	Entire Permit	Initial Permit Issuance
R1	5/31/2012	2/11/2012 4/14/2012	Renewal	Entire Permit	<p>Scheduled Permit Renewal; 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.</p> <p>Equipment in Construction Permit 3-09-C was not installed</p> <p>Equipment in Construction Permit 636-07-C was removed.</p> <p>Remove Emission Unit U5. Update the Insignificant Activities List</p>
R2	4/27/2016	N/A	Admin	U1, IA List	<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;</p> <p>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>

<b>Application #</b>	<b>Date</b>	<b>Type</b>
34119	7/11/2002	Modification (Annealing Oven #15 with afterburner)
27633	10/4/2005	Renewal (includes CAM plan)
28680	4/8/2008	RO Change
28681	10/16/2009	Update to Incorporate Construction Permits (boiler, press & RTO; inkjet printers, storage tanks, core winders (IA))
34118	12/2/2011	Update to Incorporate Construction Permits (mill modification)
27633	12/2/2011	IA Update (line carton gluers, boiler & space heaters (IA))
34177	1/17/2012	Name/Ownership Change
35500	1/31/2012	Update to Incorporate Construction Permit (Heavy Oil Scrubber System)
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)
75706	3/2/2016	IA Update (Core Winder Dust Collector)

**Abbreviations and Acronyms**

AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
HAP	- Hazardous Air Pollutant
hr	- Hour
lb	- Pound
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO <sub>x</sub>	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
TAC	- Toxic Air Contaminant
tpy	- Tons per year
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound

### **Preamble**

Title V of the Clean Air Act Amendments of 1990 (the Act) required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are: (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD or APCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations."

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit General Conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The General Conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The owner or operator's Title V permit may include a current table of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16 section 1.23, as of the date the permit was proposed for review by U.S. EPA, Region 4.

Insignificant activities identified in District Regulation 2.02, section 2 may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

Insignificant activities identified in District Regulation 2.02, section 2 shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

### **General Conditions**

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification (Form 9400-O) directly to the EPA and to the District, as set forth in Regulation 2.16, section 4.3.5.4, at the following addresses:

*US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960*

*Air Pollution Control District  
Suite 303  
701 West Ormsby Ave  
Louisville, KY 40203-3137*

This certification must be postmarked by 15 April of the year following the year for which the certification is being submitted, or other such due date as required by another applicable regulation.

3. **Compliance Schedule** - The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**
  - a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The

affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
    - ii. The permitted facility was at the time being properly operated.
    - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
    - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
  - b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
  - c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)
6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08, section 1.3. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.6)
7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
9. **Enforcement Action Defense**
- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)
10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6)
- If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA at the address shown in General Condition 35.b. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall:
- a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
- b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year. (Regulation 2.16, section 4.3.5.3.6)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements. (Regulation 2.16, section 4.3.2)
14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be sent to the District at the address shown in General Condition 2 and must be postmarked by the 60<sup>th</sup> day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation

by the District for enforcement purposes. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. All semi-annual compliance reports shall include the statement “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete” and the signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 through June 30	August 29 <sup>th</sup>
July 1 through December 31	March 1 <sup>st</sup> <sup>1</sup>

<sup>1</sup>Note: The date for leap years is February 29<sup>th</sup>

If a change in the “Responsible Official” (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, section 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)

22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1 through 5.11.6. For purposes of section 5.11.1, substantial or unresolved noncompliance includes, but is not limited to:
  - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, section 4.2; or
  - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.3, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.12 shall be submitted to:

*Air Pollution Control District  
Suite 303  
701 West Ormsby Ave  
Louisville, KY 40203-3137*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV  
APTMD - 12th floor  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

<b>Regulation</b>	<b>Title</b>
1.01	General Provisions
1.02	Definitions
1.03	Abbreviations And Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Shutdowns, Malfunctions, Startups, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Minor Facility Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

**District Only Enforceable:**

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
5.00	Standards for Toxic Air Contaminants and Hazardous air Pollutants, Definitions
5.01	Standards for Toxic Air Contaminants and Hazardous air Pollutants, General Provisions
5.02	Adoption and Incorporation of National Emission Standards for Hazardous Air Pollutants
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:
- a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;
  - b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
  - c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;
  - d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
  - e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
  - f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
  - g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40 CFR 82 Subpart A, Production and Consumption Controls. (Regulation 2.16, section 4.1.5)

**Emission Unit U1: Mill Group****U1 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4 & 5
2.04	Construction or Modification of Major Sources in or Impacting upon Non-Attainment Areas (Emission Offset Requirements)	1 through 10
2.05	Prevention of Significant Deterioration of Air Quality	1
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.3, 4 & 5
6.43	Volatile Organic Compound Emission Reduction Requirements	1, 2, 3, 4 & 17
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4 & 5
40 CFR 64	Compliance Assurance Monitoring for Major Stationary Sources	64.1 through 64.10

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U1 Equipment			
Emission Point	Description	Applicable Regulation(s)	Control ID
E1	Rolling Mill #1; (Reynolds Metals, 1969)	6.24, 6.43	C1
E2	Rolling Mill #2; (Reynolds Metals, 1962)		C2, C8
E3	Rolling Mill #3; (Reynolds Metals, 1960)		C3, C8
E4	Rolling Mill #4; (Reynolds Metals, 1967)		C4
E5	Rolling Mill #5; (Reynolds Metals, 1971)		C5
E6	Rolling Mill #6; (Davy/Kvaemer, 1997) Schneider Filter	6.43, 7.25 (BACT), 40 CFR 64	C6, C7
E26	Baron Still Distillation Unit	7.25 (non-BACT)	NA

U1 Control Devices				
Control ID	Description	Performance Indicator	Range	Stack ID
C1	Mist Eliminator	N/A	N/A	S1
C2	Mist Eliminator	N/A	N/A	S2
C3	Mist Eliminator	N/A	N/A	S3
C4	Mist Eliminator	N/A	N/A	S4
C5	Mist Eliminator	N/A	N/A	S5
C6	Mist Eliminator	N/A	N/A	S6
C7	Oil Absorption/Recovery Unit Vacuum monitoring system Temperature controller Distillation unit oil flow Condenser tanks water flow	See U1 Specific Condition <b>Error!</b> <b>Reference source not found.</b> Pressure Temperature Flow rate Flow rate	0.5 mbar – 12 mbar 260 °F – 294 °F > 1,200 l/hr > 1,200 l/hr	S6
C8	Oil Absorption/Recovery Unit Scrubber System Busch International HOS-60 <sup>1,2</sup>	Pressure Temperature	1.0 mmHg – 6.0 mmHg not less than 275°F	S42

<sup>1</sup> The District received a signed guarantee from Busch International, who manufactured the control device, on February 6, 2012. The guarantee states: “*The Heavy Oil Scrubbing system will provide 95% removal of mist and vapor phase hydrocarbons or hydrocarbon outlet emission not to exceed 50 MG/M3 (0.02 grains/dscf), whichever is less stringent. Guarantee provisions and details are in accordance with Busch Int’l proposal F-6716 Rev 3 dated June 28, 2011.*”

<sup>2</sup> The company submitted the notification of initial startup on August 27, 2012.

**U1 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not allow or cause the VOC emissions to equal or exceed 1,298 tons per twelve (12) consecutive month period from Emission Units U1 and U2.  
(Regulation 2.04; Permit 47-95-C, effective September 30, 1997)  
(Regulation 2.05; Permit 32674-11-C, dated December 1, 2011)  
(See U1 Comments 1 and 2)
- ii. For Rolling Mills #1, #2, #3, #4, and #5, no owner or operator shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, from each mill, unless the discharge has been reduced by at least 85% by weight. (Regulation 6.24, section 3.3) (See U1 Comment 3)
- iii. The owner or operator shall comply with the following, which applies to all Rolling Mills: (Regulation 6.43, section 17)
  - 1) Use a saturated hydrocarbon-based rolling coolant meeting the following specifications in all rolling processes:
    - (a) Maximum aromatic content of 2% and
    - (b) Minimum of 88% comprised of C<sub>12</sub> or higher carbon chains.
  - 2) The use of alternate rolling coolants not meeting the above specifications must receive prior, written approval by the District.
- iv. For Rolling Mill #6 (E6), the owner or operator shall not allow or cause the VOC emissions to exceed (Regulations 2.04 and 7.25; Permit 47-95-C, effective September 30, 1997) (See U1 Comments 1 and 5)
  - 1) 130.39 tons per year,
  - 2) 714.48 pounds per day.
- v. The owner or operator shall not allow or cause VOC emissions to exceed 5 tons per year from Regulation 7.25 affected facilities during any twelve consecutive month period unless a BACT is submitted and approved by the District. (Regulation 7.25, section 3) (See U1 Comment 12)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21) (See U1 Comment 9)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

- i. The owner or operator shall monthly calculate and record the consecutive 12-month total VOC emissions each calendar month to show compliance with the 1,298 ton per year limit on Units U1 and U2. (See U1 Comment 5)
- ii. The owner or operator shall monthly calculate and record the daily average VOC emissions, for Rolling Mills #1, #4, and #5 to demonstrate compliance with Regulation 6.24 section 3.3.
- iii. The owner or operator shall maintain records of the following information as required by Regulation 6.43, section 17:
  - 1) Number of working days per month;
  - 2) Pounds of rolling coolant used per month;
  - 3) Pounds of rolling coolant purchased per month;
  - 4) Pounds of rolling coolant reclaimed quarterly, prorated to a monthly basis;
  - 5) Calculated total monthly VOC emissions;
  - 6) Calculated daily average VOC emissions; and
  - 7) For each rolling coolant used, the aromatic content and the percentage of C<sub>12</sub> or higher saturated hydrocarbon compounds.
- iv. For mills #1, #2, #3, and #5 the owner or operator shall complete an annual inspection of the mill shields. Any mill shield found absent or damaged in ways that could significantly reduce their effectiveness shall be repaired or replaced. A record of the annual inspection of the mill shield and any replacement or repairs shall be kept by the source. (Agreed Board Order No. 15-02 Operation and Maintenance Plan)
- v. For the HOS-60 Heavy Oil Scrubber System (C8), if using an electronic data recording system to record monitoring data, while mill #2 or #3 is operating, the owner or operator shall monitor and record four or more data values equally spaced over each hour and average the values over an eight hour period. If manually recording monitoring data, while mill #2 or #3 is operating, the owner or operator shall monitor and record at least once per eight hours and average the values over a 24-hour period. These requirements are for the following parameters to ensure proper operation unless changes to the parameters or normal operating ranges listed have been approved in writing by the District (e.g. stack test). The owner or operator shall monitor and record any corrective action taken if the average value for any of the parameters are out of the normal operating range and record an estimate of the scrubber control efficiency during the time of the operating range excursion and the methodology used to

determine that estimated control efficiency: (40 CFR 64.3(b)(4)(i-iii))(See U1 Comments 6 and 7)

- 1) Distillation Vacuum (mmHg): 1.0 – 6.0 mmHg
  - 2) Reboiler Bottoms Temperature (°F): not less than 275°F
- vi. The owner or operator shall monthly calculate and record the consecutive 12-month total VOC emissions each calendar month to show compliance with the 130.39 ton per year limit on Rolling Mill #6.  
(See U1 Comment 5)
  - vii. The owner or operator shall monthly calculate and record the average daily VOC emissions each calendar month to show compliance with the 714.48 pound per day limit on Rolling Mill #6.
  - viii. The owner or operator shall daily record and maintain the production records of each non-BACT Regulation 7.25 affected facility.  
(Regulation 1.05, section 4) (See U1 Comment 12)
  - ix. The owner or operator shall record by the end of the first week of each month the parameters necessary to calculate the material usages during the previous month from each non-BACT Regulation 7.25 affected facility. By the end of the month, the daily usage of each VOC containing material shall be calculated and recorded, for each process, by proportioning the month's usage of each VOC containing material to the daily production for each process. (Regulation 1.05, section 4)
  - x. The owner or operator shall monthly calculate and record the consecutive 12-month total VOC emissions each calendar month to show compliance with the 5 ton per year limit on non-BACT Regulation 7.25 affected facilities.
  - xi. For the Oil Absorber/Recovery Unit (C7), if using an electronic data recording system to record monitoring data the owner or operator shall monitor and record four or more data values equally spaced over each hour and average the values over an eight hour period. If manually recording monitoring data, the owner or operator shall monitor and record at least once per eight hours and average the values over a 24-hour period. These requirements are for the following parameters to ensure proper operation unless changes to the parameters or normal operating ranges listed have been approved in writing by the District (e.g. stack test). The owner or operator shall monitor and record any corrective action taken if the average value for any of the parameters are out of the normal operating range and record an estimate of the scrubber control efficiency during the time of the operating range excursion and the methodology used to determine that estimated control efficiency: (40 CFR 64.3(b)(4)(i-iii))  
(See U1 Comment 6 and 7)
    - 1) Vacuum monitoring system's pressure: 0.5 mbar – 12 mbar;
    - 2) Scrubber oil temperature (top of column): 260 °F – 294 °F;
    - 3) Distillation unit oil flow rate: >1,200 l/hr; and
    - 4) Condenser tank water flow rate: >1,200 l/hr.

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)****a. VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for:

- i. Regulation 2.04 and 2.05:  
For Emission Units U1 and U2, the consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period.
- ii. Regulation 6.24
  - 1) Identification of all periods of exceedances of the daily VOC emission standard for the emission points: Rolling Mills #1, #4, #5; including the quantity of excess emissions;
  - 2) Reason for excess emissions;
  - 3) Description of any corrective action taken; or
  - 4) A negative declaration if no excess emissions occurred.
- iii. Regulation 6.43
  - 1) Identifications of all periods of failure to comply with a record keeping requirement specified in the terms and conditions for Emission Unit U1;
  - 2) The report shall include the date, brief description of the record keeping requirement that was not met, and corrective action taken to prevent reoccurrence of the situation that resulted in failure to comply with a record keeping requirement;
  - 3) If there are no periods of failure to comply with a record keeping requirement during a reporting period, the owner or operator shall submit a negative declaration.
- iv. For mills #1, #2, #3, and #5 a report of the annual mill shield inspection and any replacement or repairs required. A negative declaration shall be submitted if no replacement or repairs were required.
- v. For the HOS-60 Heavy Oil Scrubber System (C8), the owner or operator shall report the eight (8) or twenty-four (24) hours average values of the following parameters (which ever average is required per the requirement of S2.a.v.), as well as any corrective action taken during any period a parameter is out of the normal operating range, per the requirements of S2.a.v. The owner or operator shall report an estimate of the scrubber control efficiency during any excursion period while mill #2 or #3 were

operating and the method used to determine that estimated control efficiency. If there are no periods of any parameter being out of normal operating range while mill#2 or #3 were operating during a reporting period, the owner or operator shall submit a negative declaration:

- 1) Distillation Vacuum (mmHg)
- 2) Reboiler Bottoms Temperature (°F)

vi. Regulation 7.25

- 1) For Rolling Mill #6 (E6) and Baron Still Distillation Unit (E26), the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period;
- 2) Identification of all periods of exceedances of the yearly VOC emission standard for Rolling Mill #6 and the Baron Still Distillation Unit; including the quantity of excess emissions;
- 3) Identification of all periods of exceedances of the daily VOC emission standard for Rolling Mill #6; including the quantity of excess emissions;
- 4) Reason for excess emissions;
- 5) Description of any corrective action taken; and
- 6) A negative declaration if no excess emissions occurred.
- 7) For non-BACT affected facilities, the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period. (See U1 Comment 12)

vii. Regulation 40 CFR 64

- 1) Identification of all periods the parameters monitored from the Oil Absorption/Recovery Unit are out of range;
- 2) An estimate of the scrubber control efficiency during any excursion period and the method used to determine that estimated control efficiency;
- 3) Description of any corrective action taken; or
- 4) A negative declaration if no excursions occurred.

b. **TAC**

Within 6 months of a change that impacts the demonstration of environmental acceptability, the owner or operator shall submit the re-evaluated EA demonstration to the District.

### U1 Comments

1. The 1,258 tons per year VOC limit was established in 1995 after the source demonstrated that the modification involving installation of Rolling Mill #6 netted out for NSR. During the 10-year contemporaneous period before installation of Rolling Mill #6, the plant reduced its VOC emissions by eliminating processes and making material substitutions that became enforceable by Regulation 6.43. In connection with banking credits for these reductions the plant received a VOC limit of 778 tons per year for all equipment in Units U1 and U2 at the plant. 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 source withdrew 455 tons per year emission reduction credits of VOC from its banked emissions.  
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.
2. The source requested to modify the rolling mills to allow them to operate at an increased speed and to increase their production capacities. An increase in allowed emissions from 1,258 to less than 1,298 tons per year VOC is not a "significant emissions increase" as that term is defined in Regulation 2.05.
3. The PTE submitted by the source (using an emission factor of 82 pounds VOC per million square feet aluminum) and verified by the District show that the VOC emissions from Rolling Mills #1, #2, #3, #4, and #5 cannot exceed the four hundred and fifty (450) pounds per hour standard and Rolling Mills #2 and #3 cannot exceed the three thousand (3,000) pounds per day standards of Regulation 6.24, Section 3.3.
4. The Oil Absorption/Recovery Unit ("scrubber") that controls VOC emission from Rolling Mill #6 (90% capture and 95% control efficiency) is considered BACT to demonstrate compliance with 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".
5. A rolling mill emission factor for the mills shall be updated annually based on the prior year's data. The calculation for Rolling Mill #6 shall be performed separately from the other mills. At the end of each year annual rolling mill emissions are calculated based on a material balance by subtracting outputs from inputs to the system. The inputs include rolling oil, hydraulic oils, oil additives, and oil on reroll (incoming metal) and scrubber oils (Rolling Mill #6 only). Outputs shall include oil on scrap and finished metal, oil in filter cake, spent oils shipped offsite, and estimated annealing emissions. The rolling mill emission factors shall be calculated annually by dividing the total estimated emissions by the total surface area of the metal rolled in the mills. These emission factors shall be applied to the daily mill production data to calculate daily emissions.

6. The absorber is monitored continuously by a message system. The message system is an automated control program which measures numerous parameters integral to the proper operation of Rolling Mill #6's oil absorption and recovery unit ("scrubber"). It monitors the proper functioning of pumps, motors, vacuum and filtration units, in addition to various fluid levels, temperatures, and pressures within the scrubber system. When a problem is detected, the mill operators are notified immediately by an error message on the computer screen and by a flashing light in the control room. The exact location of the problem is identified on an electronic schematic in the control room. If the problem cannot be corrected immediately, the mill will automatically shut down at the end of the coil and will not restart until the problem is corrected. In the event of an absorber malfunction, an error message appears on the operator's computer screen and immediate corrective action will be initiated.
7. The source is major for VOC and a control device is needed to achieve compliance with District Regulation 7.25 on Rolling Mill #6. In accordance with 40 CFR 64, Compliance Assurance Monitoring for Major Stationary Sources, the source 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.
8. In September 2008, the District permitted a rolling oil raw material change to Magiesol 44 which conforms to the specifications of Regulation 6.43, section 17.1.1 and 17.1.2. (Construction Permit #568-08-C)
9. A one-time compliance demonstration was performed on 09/04/08 for TACs from the rolling oil, Magiesol 44, and the potential uncontrolled emissions are de minimis.
10. The source has a banking permit on file, permit #31-00-B, for Volatile Organic Compounds (VOCs). 59.32 tons were withdrawn on January 24, 1997 as a contribution to the Voluntary Reduction Plan. The account balance is 1,328.17 tons per year (7,277.64 pounds per day). This balance includes 628.27 tons per year (3,441.1 pounds per day) of pre-1990 credits and 699.90 tons per year of post-1990 credits. (The pre-1990 credits are included in the total since these credits were included in the 1990 and the projected 1996 emissions inventories.) Banking Permits 224-95 and 367-80 were voided.
11. The District agreed to consider the emissions from rolling mills as VOC emissions only in correspondence dated January 15, 1985.
12. 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	Baron Still	4.38
U2	E20	Annealing Oven #31	2.26
IA2	E43-E53	Core Winders	0.26
IA3	E56-E63, E89	Ink Jet Printers	1.43
IA4	E72-E77	Line Cartoners	0.23
IA6	E87	Better Engineering Parts Washer	0.07

**Emission Unit U2: Oven Group**

**U2 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
2.04	Construction or Modification of Major Sources in or Impacting upon on-Attainment Areas (Emission Offset Requirements)	1 through 10
2.05	Prevention of Significant Deterioration of Air Quality	1
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.3,4 & 5
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 3.2, 4 & 5

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U2 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E9	Annealing Oven #1 (Lanly Co., 1954)	6.24	N/A
E10	Annealing Oven #2 (Lanly Co., 1965)		
E11	Annealing Oven #3 (Lanly Co., 1970)		
E12	Annealing Oven #4 (Lanly Co., 1971)		
E13	Annealing Oven #5 (Loftus Engineering, 1960)		
E16	Annealing Oven #21 (Salem Corp, 1975)		
E17	Annealing Oven #22 (Surface Combustions, 1975)		
E18	Annealing Oven #24 (Surface Combustions, 1975)		
E19	Annealing Oven #25 (Surface Combustions, 1975)		
E15	Annealing Oven #15 (Seco/Warwick, 2001)	7.25 (BACT)	Thermal after-burner C10
E20	Annealing Oven #31 (Sunbeam Equipment Corp, 1985)	7.25 ( non-BACT)	N/A

<b>U2 Control Devices</b>				
<b>ID</b>	<b>Description</b>	<b>Performance Indicator</b>	<b>Range</b>	<b>Stack ID</b>
C10	Thermal Afterburner	Temperature	> 1,600° F	S36
		Retention Time	> 0.5 second	

**U2 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not allow or cause the VOC emissions to equal or exceed 1,298 tons per twelve (12) consecutive month period from Emission Units U1 and U2.  
(Regulation 2.04; Permit 47-95-C, dated September 30, 1997)  
(Regulation 2.05; Permit 32674-11-C, dated December 1, 2011)  
(See U2 Comments 1 and 2)
- ii. For Annealing Ovens #1, #2, #3, #4, #5, #21, #22, #24 and #25, no owner or operator shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, from each oven, unless the discharge has been reduced by at least 85% by weight. (Regulation 6.24, section 3.3) (See U2 Comment 3)
- iii. For Annealing Oven #15 (E15), the owner or operator shall not allow or cause the VOC emissions to exceed 9.07 tons per year. (Regulation 7.25, section 3.1; Permits 208-00-C, 209-00-C, dated September 13, 2000) (See U2 Comment 4)
- iv. For Annealing Oven #15's Thermal Afterburner (C10), shall be operated such that it has a combustion chamber temperature of at least 1,600° F averaged over three hours and a retention time of at least ½ second when VOC emissions are being emitted from Annealing Oven #15. Any three-hour period during which the average combustion chamber temperature is more than 50°F below 1,600°F shall be classified as a period of excess emissions for reporting purposes. *The acceptable minimum temperature may be reestablished by performing a new emission test.*  
(Regulation 7.25, section 3.1; Permits 208-00-C, 209-00-C, dated September 13, 2000) (See U2 Comment 3)
- v. The owner or operator shall not allow or cause VOC emissions to exceed 5 tons per year from Regulation 7.25 affected facilities during any twelve consecutive month period unless a BACT is submitted and approved by the District. (Regulation 7.25, section 3)  
(See U2 Comment 10)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.  
(Regulations 5.01 and 5.21) (See U2 Comment 9)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

- i. The owner or operator shall monthly calculate and record the consecutive 12-month total VOC emissions for each calendar month to show compliance with the 1,298 tpy limit on Units U1 and U2.
- ii. The owner or operator shall daily record and maintain the production records for Annealing Oven #15. (Regulation 1.05, section 4)
- iii. The owner or operator shall monthly calculate and record the consecutive 12-month total VOC emissions each calendar month to show compliance with the 9.07 ton per year limit on Annealing Oven #15.
- iv. For Annealing Oven #15's Thermal Afterburner (C10), the owner or operator shall monitor and record the combustion chamber temperature at least once every 10 minutes when the afterburner is operated to control VOC emissions. (Regulation 7.25, section 4.1)
- v. The owner or operator shall daily record and maintain the production records of each non-BACT Regulation 7.25 affected facility. (Regulation 1.05, section 4) (See U2 Comment 10)
- vi. The owner or operator shall record by the end of the first week of each month the parameters necessary to calculate the material usages during the previous month from each non-BACT Regulation 7.25 affected facility. By the end of the month, the daily usage of each VOC containing material shall be calculated and recorded, for each process, by proportioning the month's usage of each VOC containing material to the daily production for each process. (Regulation 1.05, section 4)
- vii. The owner or operator shall monthly calculate and record the consecutive 12-month total VOC emissions each calendar month to show compliance with the 5 ton per year limit on non-BACT Regulation 7.25 affected facilities.

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)****a. VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for:

## i. Regulation 2.04

For Emission Units U1 and U2, the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period;

## ii. Regulation 7.25

## 1) For Annealing Oven #15 (E15)

(a) Identification of the time periods (start time/finish time) and durations (length of period specified in hours and minutes) that Annealing Oven #15 was operated while the afterburner combustion chamber was not maintained at the required temperature level, with a listing of the average temperature values during these periods. Any other time periods during which the afterburner malfunctioned or was bypassed (when VOC emissions are being emitted from Annealing Oven #15) shall also be reported. If there were no periods during which the afterburner combustion chamber was not being maintained at the required temperature level, and if no other malfunctions or bypasses occurred during the reporting period, this should be reported,

(b) A description of the probable cause of the low temperature readings and the other malfunctions and bypasses and a description of the corrective actions or preventive measures taken, and

(c) The monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period.

## 2) For non-BACT affected facilities, the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period. (See U2 Comment 10)

b. **TAC**

Within 6 months of a change that impacts the demonstration of environmental acceptability, the owner or operator shall submit the re-evaluated EA demonstration to the District.

**U2 Comments**

1. The 1,258 tons per year VOC limit was established in 1995 after the source demonstrated that the modification involving installation of Rolling Mill #6 netted out for NSR. During the 10-year contemporaneous period before installation of Rolling Mill #6, the plant reduced its VOC emissions by eliminating processes and making material substitutions that became enforceable by Regulation 6.43. In connection with banking credits for these reductions the plant received a VOC limit of 778 tons per year for all equipment in Units U1 and U2 at the plant. 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 source withdrew 455 tons per year emission reduction credits of VOC from its banked emissions.

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.

2. The source requested to modify the rolling mills to allow them to operate at an increased speed and to increase their production capacities. An increase in allowed emissions from 1,258 to less than 1,298 tons per year VOC is not a “significant emissions increase” as that term is defined in Regulation 2.05.
3. The PTE submitted by the source (using an emission factor of 8.82 pounds VOC per million square feet aluminum) and verified by the District show that the VOC emissions from Annealing Ovens #1, #2, #3, #4, #5, #21, #22, #24 and #25 cannot exceed the four hundred and fifty (450) pounds per hour standard and the three thousand (3,000) pounds per day standards of Regulation 6.24, Section 3.3.
4. The owner or operator shall utilize Best Available Control Technology (BACT) to control the VOC emissions from Annealing Oven #15. The District has determined that the use of the Thermal Afterburner, specified in the permit application dated 13 September 2000, shall comply with the requirement to utilize BACT.
5. Incoming and finished metal is heated in annealing ovens to achieve the desired properties necessary for rolling aluminum and manufacture of foil. Annealing oven emissions are based on a factor of 2 mg of oil per square foot per side of the metal surface rolled. Assuming that all oil is driven off and emitted during the annealing operation, an emission factor is derived as follows:  

$$(2 \text{ sides})(2 \text{ mg/ft}^2)(2.205 \text{ lbs/kg})(\text{kg/l} \times 10^6 \text{ mg}) = 8.82 \text{ lbs/MMft}^2 \text{ Annealed}$$
6. Annealing Oven #25 is an electric oven and thus not a combustion source.
7. In the permit application, the company estimated that 95% of the VOCs from Annealing Oven #15 will be captured and sent to the afterburner and that the afterburner will have a destruction efficiency of 90%. This results in an overall control efficiency of 85.5%. Operating Annealing Oven #15 at the worst case conditions of 78,000 sq. ft. per roll, six 12” rolls per rack, 72 racks per batch, 2 mg of oil per sq. ft. of sheet, oil on both sides of sheet, and 417 batches per year, this process will emit 9.07 tons VOC/year (3.13 tons/year of fugitive emissions and 5.94 tons/year from the afterburner). If it is assumed that all the VOCs will be emitted during the first 5 hours of the anneal cycle when the VOCs from the surface of the rolled aluminum foil are driven off and sent to the afterburner, this process will have an average emission rate during the 5-hour period of 8.7 lbs VOC/hr (3.0 lbs/hr of fugitive emissions and 5.7 lbs/hr from the afterburner) at the worst case conditions.
8. Annealing Oven #15 and its control device, the Thermal Afterburner are incorporated into the Title V Permit Renewal from Construction Permits 208-00-C and 209-00-C, respectively.
9. A one-time compliance demonstration was performed on 09/04/08 for TACs from the rolling oil, Magiesol 44, and the potential uncontrolled emissions are de minimis.

10. The following affected facilities are included in the Regulation 7.25 non-BACT plant-wide 5 ton per year limit:

<b>Unit</b>	<b>Point</b>	<b>Description</b>	<b>PTE</b>
U1	E26	Baron Still	4.38
U2	E20	Annealing Oven #31	2.26
IA2	E43-E53	Core Winders	0.26
IA3	E56-E63, E89	Ink Jet Printers	1.43
IA4	E72-E77	Line Cartoners	0.23
IA6	E87	Better Engineering Parts Washer	0.07

**Emission Unit U3: Boiler****U3 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3 and 4
40 CFR 60 Subpart A	General Provisions	60.1 through 60.19
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	40 CFR 60.40c(a)

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
7.02	Adoption of Federal New Source Performance Standards	3.11 (40 CFR 60 Subpart Dc)

<b>U3 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E38	One (1) 24.5 MMBtu/hr natural gas boiler, Cleaver Brooks, installed in 2003	40 CFR 60 Subpart Dc, 7.02, 7.06	N/A

**U3 Control Devices:** There are no control devices associated with Emission Unit U3.

**U3 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. SO<sub>2</sub>**

The owner or operator shall not cause to be discharged into the atmosphere any gases which contain sulfur dioxide in excess of 1.0 lb/MMBtu actual total heat input for combustion of liquid and gaseous fuels. (Regulation 7.06, section 5.1.1; Permit 30-03-C, dated January 21, 2004) (See U3 Comment 1)

**b. PM**

The owner or operator shall not cause to be discharged into the atmosphere particulate matter in excess of 0.35 lb/MMBtu actual total heat input. (Regulation 7.06, section 4.1.4; Permit 30-03-C) (See U3 Comment 1)

**c. Opacity**

The owner or operator shall not cause the emission into the open air of particulate matter from any indirect heat exchanger which is greater than 20%. (Regulation 7.06, section 4.2)

**d. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. SO<sub>2</sub>**

i. The owner or operator shall record and maintain records of the amount of each fuel combusted in the Cleaver Brooks boiler during each month. (40 CFR §60.48c(g)(2))

ii. As an alternative to meeting the requirements of 40 CFR §60.48c(g)(2), the owner or operator shall record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. (40 §CFR 60.48c(g)(3))

**b. PM**

There are no monitoring or record keeping requirements for PM compliance. (See U3 Comment 1)

**c. Opacity**

There are no monitoring or record keeping requirements for Opacity compliance. (See U3 Comment 2)

**d. TAC**

See U3 Comment 3.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)****a. SO<sub>2</sub>**

There are no compliance reporting requirements for this equipment.

**b. PM**

There are no compliance reporting requirements for this equipment.

**c. Opacity**

There are no compliance reporting requirements for this equipment.

**d. TAC**

See U3 Comment 3.

**U3 Comments**

1. A one-time PM and SO<sub>2</sub> 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, record keeping, and reporting requirements for these boilers with respect to PM and SO<sub>2</sub> emission limits.
2. The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard. Therefore, the source is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.
3. 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 5.01, section 1.6.7)
4. The Cleaver Brooks boiler is incorporated into the Title V Permit Renewal from Construction permit 30-03-C. The Fulton boiler is incorporated into the Title V Permit Renewal from the Insignificant Activities Summary Form AP-100P.

**Emission Unit U4: Parts Washers (No secondary reservoirs)****U4 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1 through 4

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable sections</b>
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U4 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E27	Building E-1, Dolly Shop; 55 gallons	6.18	N/A
E28	Mill 6 Building; 55 gallons		
E29	Reynolds Wrap parts shop; 6 gallons		

**U4 Control Devices:** There are no control devices associated with Emission Unit U4. None of the parts washers are equipped with secondary reservoirs.

**U4 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
  - 1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
  - 2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
  - 3) A permanent, conspicuous label summarizing the operating requirements specified in U4 Specific Condition S1.a.ii shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
  - 4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
  - 5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
  - 6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- ii. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)
  - 1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)

- 2) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)
  - 3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
  - 4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
  - 5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
  - 6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
  - 7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

b. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

- i. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)
  - 1) The name and address of the solvent supplier,
  - 2) The date of the purchase,
  - 3) The type of the solvent, and
  - 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

- ii. All records required in U4 Specific Condition S2.a.i shall be retained for 5 years and made available to the District upon request.  
(Regulation 6.18, section 4.4.3)

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

**a. VOC**

There are no routine compliance reporting requirements for Regulation 6.18.

**b. TAC**

Within 6 months of a change of a raw material as described in U4 Specific Condition S2.b.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

**U4 Comments**

1. Cold solvent parts washers are an affected facility as defined in Regulation 6.18 and hence are not insignificant per the definition of insignificant activities, Regulation 2.16, section 1.23.1.
2. At the time of permit issuance, the solvent used in the cold cleaners contain no HAPs or TACs.

**Emission Unit U6: Core Paper Cyclone**

**U6 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.09	Standard of Performance for Existing Process Operations	1, 2, 3, & 5

<b>U6 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Stack ID</b>
E33	Core paper cyclone, used to transfer waste, core paper scrap from the core winders	6.09	S35

**U6 Control Devices:** There are no control devices associated with Emission Unit U6.

**U6 Specific Conditions**

**S1. Standards (Regulation 2.16, section 4.1.1)**

**a. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1, Regulation 7.08, section 3.1.1)

**b. PM**

The owner or operator shall not allow PM emissions to exceed 2.58 lb/hr. (See U6 Comment 1) (Regulation 6.09, section 3.2)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. Opacity**

There are no monitoring or record keeping requirements for Opacity compliance. (See U6 Comment 2)

**b. PM**

There are no monitoring or record keeping requirements for PM compliance.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

**a. Opacity**

There are no compliance reporting requirements for this equipment.

**b. PM**

The potential uncontrolled emissions of PM do not exceed the allowable emission limit for this equipment; therefore, no compliance monitoring reports are required.

**U6 Comments**

1. A one-time compliance demonstration was performed for PM for this equipment and the pound per hour standard cannot be exceeded uncontrolled.
2. The District has determined that no periodic visible emissions surveys are required for this equipment.

**Emission Unit U7: VOC Storage Tank Group****U7 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1 through 5, 7 and 8

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3 & 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U7 Equipment</b>		
<b>Emission Point</b>	<b>Description</b>	
E34	One (1) 20,080 gallon tank, Tank #1	
E35	One (1) 20,080 gallon tank, Tank #2	
E78	One (1) 10,000 gallon tank, Tank #3	
E79	One (1) 10,000 gallon tank, Tank #4	
E36	One (1) 20,080 gallon tank, Tank #5	
E37	One (1) 20,080 gallon tank, Tank #6	
E80	One (1) 10,000 gallon tank, Tank #7	
E81	One (1) 10,000 gallon tank, Tank #8	
E82	One (1) 1,000 gallon tank, Tank #9	
E83	One (1) 5,000 gallon tank	
E39	One (1) 5,000 gallon tank 1S	
E40	One (1) 5,000 gallon tank 2N	
E41	350 gallon non-stick tank	
E42	350 gallon portable tote	

**U7 Control Devices:** There are no control devices associated with Emission Unit U7.

**U7 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia, unless the tanks are equipped with a permanent submerged fill pipe. (Regulation 7.12, section 3) (See U7 Comment 1)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21) (See U7 Comment 2)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

The owner or operator of the storage vessels shall maintain records of the material stored in the storage vessels and if the contents of the storage vessels are changed a record shall be made of the new contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with U7 Specific Condition S1.a.

**b. TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall timely report abnormal conditions or operational changes which may cause excess emissions.

**a. VOC**

There are no compliance reporting requirements for this equipment.

**b. TAC**

Within 6 months of a change of a raw material as described in U7 Specific Condition S2.b.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

**U7 Comments**

1. For storage vessels, Regulation 7.12 applies due to the size of the tanks, but since the vapor pressure as stored is less than 1.5 psia there are no applicable standards in the regulation.
2. The District performed a one-time compliance demonstration for TACs on July 14, 2009 and the de minimis levels cannot be exceeded uncontrolled.
3. The Federal Regulation, 40 CFR 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, was amended by EPA on October 15, 2003. The amendment excluded storage vessels that contain a liquid with a maximum true vapor pressure below 3.5 kilopascals (26.2 mm Hg). The rolling oil, MagieSol 44, has a listed vapor pressure of '0.05 mm Hg' (0.00096 psia).
4. The potential VOC emissions are less than 40 tons per year which are below the significant net increase as defined in Regulation 2.05 - *Prevention of Significant Deterioration of Air Quality*. PSD does not apply; therefore, the source is not required to accept an operational or emissions cap to avoid PSD/NSR.
5. The two 5,000 gallon storage tanks, 350 gallon non-stick tank and 350 gallon portable tank are incorporated into the Title V Permit Renewal from Construction permit 145-09-C, dated July 24, 2009. The equipment in Construction Permit 3-09-C, dated January 15, 2009, was never installed.

**Emission Unit U10: Rotogravure Press & Thermal Oxidizer****U10 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
2.05	Prevention of Significant Deterioration of Air Quality	1
6.29	Standard of Performance for Graphic Arts Facilities Using Rotogravure or Flexographic Printing	1, 2, 3, 4, & 6
40 CFR 64	Compliance Assurance Monitoring for Major Stationary Sources	64.1 through 64.10

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3 & 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U10 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
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. Press Manufacturer: Kroenert Press Model: FCM	6.29	C11

<b>U10 Control Devices</b>				
<b>ID</b>	<b>Description</b>	<b>Performance Indicator</b>	<b>Range</b>	<b>Stack ID</b>
C11	One (1) Thermal Oxidizer to control the VOC emissions from the rotogravure printing/coating press. Manufacture: L&E America Model: TR 6.595	Temperature	> 1,499° F < 1,800 °F See U10 Comment 5	S39 S40

**U10 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not allow or cause VOC emissions to equal or exceed 40 tons during any twelve consecutive month period. (Regulation 2.05; Permit 1-09-C, dated January 15, 2009) (See U10 Comments 1 and 5)
- ii. The owner or operator shall not cause or allow the emission of VOC from any affected facility unless at least one of the following requirements is met: (Regulation 6.29, section 3)
  - 1) The volatile fraction of all water based inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 25% VOC by volume, (section 3.1.1)
  - 2) The non-volatile fraction, minus water and exempt solvents, of all water based inks and coatings, as applied to the substrate, used on the affected facility shall be at least 60% by volume, (section 3.1.2)
  - 3) All water based inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 0.5 pound of VOC per pound of solids, (section 3.1.3) or
  - 4) For packaging rotogravure printing or specialty rotogravure printing, when using solvent based inks and coatings, the owner or operator shall not cause or allow the emission of VOC from any affected facility to exceed 35% by weight of the VOC net input into the affected facility. (section 3.1.4.2)
- iii. The owner or operator shall operate and maintain the thermal oxidizer at all times the rotogravure press is in operation and applying solvent-based inks and/or coatings to reduce the rotogravure printing ink and solvent VOC emissions by 65%. (Regulation 6.29, section 3)

**b. TAC**

- i. The owner or operator shall not allow or cause the emissions of ammonia to exceed 54.0 pounds per hour and 48,000 pounds per year. (Regulation 5.21, section 3.1.1) (See U10 Comment 3)
- ii. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

- i. The owner or operator of an affected facility subject to Regulation 6.29 shall maintain daily records of operations for the most recent five-year period. The records shall be made available to the District, the Cabinet,

and the EPA upon request. The records shall include, but not be limited to, the following: (Regulation 6.29, section 6.1)

- 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
  - 2) The application method and substrate type (metal, plastic, paper, etc.),
  - 3) The amount and type of each ink, coating, and solvent used at each point of application, including exempt compounds, during the averaging period.
  - 4) The VOC content as applied in each ink, coating, and solvent,
  - 5) The date for each application of each ink, coating, and solvent.
- ii. When an affected facility uses add-on controls to achieve compliance, monitoring, record keeping, and the maintenance of certain documentation shall be required. For thermal incineration, the combustion temperature, inlet and outlet VOC concentration from emission tests, how and when these concentrations were determined, destruction or removal efficiency, and manufacturer data. (Regulation 6.29, section 6.2)
- iii. The owner or operator shall record the thermal oxidizer's combustion chamber temperature at least once every 8 hours when a control efficiency is claimed for compliance with the VOC emissions limitations. The minimum combustion chamber operating temperature was established in the most recent District approved emission test. *The acceptable minimum temperature may be reestablished by performing a new emission test.* (Regulation 1.05, section 4.1, Regulation 2.05, and 40 CFR 64) (See U10 Comment 5)
- iv. The owner or operator shall quarterly monitor the combustion chamber temperature with a calibrated meter and maintain records of the quarterly verification of the combustion chamber temperature (40 CFR 64) (See U10 Comment 7)
- v. The owner or operator shall maintain monthly records, including calculations that show the consecutive 12-month total uncontrolled VOC emissions from the rotogravure press. (See U10 Comment 2)
- vi. The owner or operator shall maintain monthly records, including calculations that show the consecutive 12-month total controlled VOC emissions from the rotogravure press. (See U10 Comments 2 and 6)
- vii. The owner or operator shall maintain monthly records that show the percent reduction of VOC emissions. (See U10 Comment 2)
- viii. The owner or operator shall maintain monthly records of the maintenance items in U10 Specific Condition S2.a.iv.
- b. TAC**
- i. The owner or operator shall monitor and maintain records of the quantity of each ink and coating applied that contains ammonium hydroxide.

- ii. The owner or operator shall maintain monthly records, including calculations that show the emissions of ammonia during each calendar month and the year-to-date emissions of ammonia.
- iii. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- iv. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for:

**a. VOC**

- i. For the rotogravure press, the calendar month and consecutive 12-month VOC emissions for each month in the reporting period.
- ii. Identification of all periods of excursions during the reporting period. Excursion is defined as any departure from an established control device performance indicator range (minimum combustion chamber temperature established during an approved emission test). (See U10 Comment 5)
- iii. Identification of all periods when the VOC emissions exceeded 35% by weight of the VOC net input into the affected facility. If there were no periods of exceedance during a reporting period, the owner or operator shall submit a negative declaration for the reporting period.

**b. TAC**

- i. Identification of all periods of exceeding the pound per hour and/or pound per year emission limits for ammonia, including the quantity of excess emissions. If there are no periods of excess ammonia emissions during a reporting period, the owner or operator shall submit a negative declaration.
- ii. Within 6 months of a change that impacts the demonstration of environmental acceptability, the owner or operator shall submit the re-evaluated EA demonstration to the District.

**U10 Comments**

1. The potential controlled VOC emissions (12.73 tpy) are less than 40 tons per year which is below the significant net increase as defined in Regulation 2.05 – *Prevention of Significant Deterioration of Air Quality*.
2. Uncontrolled VOC emissions may be calculated according to the following methodology:  

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)}$$
 or  

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{VOC content (lb/gal)}$$

Controlled VOC emissions may be calculated according to the following methodology:

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{Density (lb/gal)} \times \text{VOC content (\%)} \times [100 - (\text{Capture Efficiency (\%)} \times \text{Destruction Efficiency (\%)})]$$

or

$$\text{VOC (lb)} = \text{Coating used (gal)} \times \text{VOC content (lb/gal)} \times [100 - (\text{Capture Efficiency (\%)} \times \text{Destruction Efficiency (\%)})]$$

An example of a methodology to determine compliance is as follows:

$$\frac{\text{Total Solvent Based Controlled VOC Emissions}}{\text{Total Solvent Based Uncontrolled VOC Emissions}} \times 100\% < 35\%$$

3. This Unit is subject to the STAR program requirements in accordance with Regulations 5.01, 5.21, and 5.23. 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.
4. 40 CFR Part 60, Subpart QQ does not apply to this rotogravure press since this press does not meet the definition of a publication rotogravure printing press as defined in §60.431(a). 40 CFR Part 60, Subpart FFF does not apply to this rotogravure press since this press does not meet the definition of flexible vinyl and urethane coating and printing as defined in §60.581(a). 40 CFR Part 63, Subparts KK and JJJJ do not apply to this rotogravure press since this plant is not a major source of hazardous air pollutants.
5. The required performance testing from permit 2-09-C of the Thermal Oxidizer was performed on December 1, 2009. 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. Unless and until additional performance testing is completed a period of excursion occurs when the average combustion temperature over any three-hour period is less than 1,499 °F.
6. These records will show compliance with the less than 40 ton per year PSD/NSR avoidance limit.
7. In the source's revised CAM plan for the RTO, received on 04/04/2007, the Monitoring Approach section, QA/QC Practices and Criteria subsection states "In order to verify temperature readings are accurate operations will periodically (at least once per quarter) verify the combustion chamber temperatures using a meter."
8. The Rotogravure Press and its control device, the Thermal Oxidizer are incorporated into the Title V Permit Renewal from Construction Permits 1-09-C and 2-09-C, respectively.

**Emission Unit U11: Emergency Firewater Pump****U11 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	63.6595(a)(1), 63.6603(a), 63.6605, 63.6625(e),(f),(h),(i), 63.6640(b), (f)(1), 63,6650(f), 63.6655(e),(f)

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation of National Emission Standards for Hazardous Air Pollutants	1, 3, 4 and 5
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U11 Emission Points</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E85	Emergency Firewater Pump, 218 Brake Horsepower, manufactured in August 1996	40 CFR 63 Subpart ZZZZ	N/A

**U11 Control Devices:** There are no control devices associated with Emission Unit U11.

**U11 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. HAP (40 CFR 63 Subpart ZZZZ)**

- i. For the emergency diesel generators the below limits of operation shall apply as of May 3, 2013. (40 CFR §63.6595(a)(1))
  - 1) There is no time limit on the use of the emergency stationary RICE in emergency situations. (40 CFR §63.6640(f)(1)(i))
  - 2) Maintenance checks and readiness testing, as required by Federal, state or local government, the manufacturer, the vendor or the insurance company associated with the emergency unit, is limited to 100 hours per year. If additional hours are required, a request for additional hours, listing the reasons for the additional hours, shall be submitted to the District for approval. (40 CFR §63.6640(f)(1)(ii))
  - 3) The emergency stationary RICE may be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year limit provided for maintenance and testing. The 50 hours per year of non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to a electric grid or otherwise supply power as part of a financial arrangement with another entity: except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or emergency deficiency, or unacceptable voltage level. (40 CFR §63.6640(f)(1)(iii))
- ii. The owner or operator of the existing emergency generators shall perform the below listed maintenance. The engine must be installed and configured according to the manufacturer's specifications. (40 CFR §63.6603(a) and Table 2d.4) (See U11 Comment 2)
  - 1) Change oil and filter every 500 hours of operation or annually, whichever comes first:<sup>1</sup> (Note <sup>1</sup>: Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.)
  - 2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
  - 3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

- iii. The owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR §63.6605(b))
- iv. The owner or operator must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR §63.6625(e))
- v. The owner or operator must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. (40 CFR §63.6625(h))

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

**S2. Monitoring and Recordkeeping (Regulation 2.16, section 4.1.9.1)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. HAP (40 CFR 63 Subpart ZZZZ)**

- i. The owner or operator of the existing emergency generator shall monitor and record the maintenance activities performed to show compliance with U11 Specific Condition S1.a.iv. (40 CFR §63.6655(e))
- ii. The owner or operator must document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. (40 CFR §63.6655(f))

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for:

**a. HAP (40 CFR 63 Subpart ZZZZ)**

- i. The owner or operator shall report if the emergency stationary RICE is operated over 50 hours per year in non-emergency situations. (40 CFR §63.6650(f))
- ii. The owner or operator shall report if the emergency stationary RICE is operated over 100 hours per year for maintenance checks and readiness testing. (40 CFR §63.6650(f))
- iii. The owner or operator shall report each instance when an operating limitation in U11 Specific Condition S1.a.ii was not met. (40 CFR §63.6640(b))

**b. TAC**

Within 6 months of a change of a raw material as described in U11 Specific Condition S2.b.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

**U11 Comments**

1. This equipment is subject to 40 CFR Part 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, because it is an existing RICE located at an area source of HAP emissions. The existing emergency generator shall be in compliance by the owner or operator performing the maintenance defined in 40 CFR Part 63 Subpart ZZZZ Table 2d.
2. This equipment is not subject to 40 CFR Part 60 Subpart IIII because it was constructed in 1996.

### Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

### Off-Permit Documents

There are no off permit documents associated with this Title V permit.

### Alternative Operating Scenario

The source requested no alternative operating scenario in its Title V Application.

### Insignificant Activities<sup>3</sup>

Equipment	Quantity	PTE (tpy)	Reg. Basis
Indirect heat exchangers < 10 MMBtu/hr			
IA1 York Shipley (7.328 MMBtu/hr)	1	3.15 NO <sub>x</sub>	2.02, 2.1.1
IA1 Fulton (2.1 MMBtu/hr)	1	0.90 NO <sub>x</sub>	2.02, 2.1.1
IA1 Fulton (1.674 MMBtu/hr)	1	0.70 NO <sub>x</sub>	1.02, App. A
Natural Gas Heaters	25	2.12 PM each	2.16, 1.22.1.2.1
Internal mobile combustion engines	<100	0.35 NO <sub>x</sub> each	2.02, 2.2
Storage tank - diesel or fuel oil (not for sale)	3	<0.01 VOC each	2.02, 2.3.25
All pressurized VOC storage vessels	<100 (propane)	0	2.02, 2.3.26
Cooling Towers <sup>4</sup>	6		2.16, 1.23.1.2.1
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	
IA7 Roll Grinders	3	0.07 VOC	2.16, 1.23.1.2.1
Spent Filter Media Dumpster	1	4.76 VOC	See Note 5)

### IA Comments

- 1) Insignificant activities identified in District Regulation 2.02 section 2 may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

<sup>3</sup> The source also has a trivial maintenance woodworking activity and a Micro-90 ultrasonic cleaner that does not emit any air pollutants.

<sup>4</sup> The PTE numbers are from correspondence from the company dated 4/18/2013.

- 2) Insignificant activities identified in District Regulation 2.02 section 2 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) 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.
- 5) The emissions from this item are accounted for in Unit U1.
- 6) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that monitoring, record keeping, or reporting requirements apply to the insignificant activities listed below.

<b>Equipment</b>	<b>Quantity</b>	<b>PTE (tpy)</b>	<b>Reg. Basis</b>
IA2 Core Winders	11	0.02 VOC each	See Note 7)
IA3 Inkjet Printers	9	0.18 VOC each	See Note 8)
IA4 Line Cartoners	6	0.04 VOC each	See Note 7), 8)
IA6 Better Engineering Parts Washer	1	0.07 VOC	See Note 8)

- 7) This equipment has an applicable regulation, but meets the definition of insignificant activity in Regulation 2.16, section 1.23.1.2. Regulation 7.08 applies, with a standard of 2.34 lb/hr, but the equipment cannot exceed the standard uncontrolled so there are no monitoring or record keeping requirements. The emissions shall be reported on the annual emission inventory.
- 8) This equipment has an applicable regulation, but meets the definition of an insignificant activity in Regulation 2.16, section 1.23.1.2. Regulation 7.25 applies.
- 9) The source has discontinued the use of trichloroethylene (a Class II solvent) in all degreasing processes in the plant (Formerly Emission Unit U5). The new product the plant is using is called Simple Green® All-Purpose Cleaner (a Class III solvent). The new product does not fall into the applicability of Regulation 6.24, section 1.2.5. The organic solvent comprises much less than 20% of the volatile content by volume as applied.

**Emission Unit IA1: Boiler Group**

**IA1 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3 and 4

<b>IA1 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E67	One (1) 2.1 MMBtu/hr natural gas boiler, Fulton Fuel Fired Steam Boiler, installed in 2007 in Mill 6 building	7.06	N/A
E84	One (1) 7.328 MMBtu/hr natural gas boiler, York Shipley Boiler, installed in 2011 in the Reynolds Wrap Building	7.06	N/A
E86	One (1) 1.674 MMBtu/hr natural gas boiler, Fulton Steam Solutions Boiler, installed in 2015 in Mill 6 building	7.06	N/A

**IA1 Control Devices:** There are no control devices associated with Emission Unit IA1.

**IA1 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. SO<sub>2</sub>**

- i. For the Fulton Fuel Fired Steam Boiler (E67 and E86): The owner or operator shall not cause to be discharged into the atmosphere any gases which contain sulfur dioxide in excess of 1.0 lb/MMBtu actual total heat input for combustion of liquid and gaseous fuels. (Regulation 7.06, section 5.1.1)
- ii. For the York Shipley Boiler (E84): The owner or operator shall not cause to be discharged into the atmosphere any gases which contain sulfur dioxide in excess of 1.0 lb/MMBtu actual total heat input for combustion of liquid and gaseous fuels. (Regulation 7.06, section 5.1.1)

**b. PM**

- i. For the Fulton Fuel Fired Steam boiler (E67 and E86): The owner or operator shall not cause to be discharged into the atmosphere particulate matter in excess of 0.33 lb/MMBtu actual total heat input. (Regulation 7.06, section 4.1.4)
- ii. For the York Shipley Boiler (E84): The owner or operator shall not cause to be discharged into the atmosphere particulate matter in excess of 0.29 lb/MMBtu actual total heat input. (Regulation 7.06, section 4.1.4)

**c. Opacity**

The owner or operator shall not cause the emission into the open air of particulate matter from any indirect heat exchanger which is greater than 20%. (Regulation 7.06, section 4.2)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. SO<sub>2</sub>**

There are no monitoring or record keeping requirements for SO<sub>2</sub> compliance. (See IA1 Comment 1)

**b. PM**

There are no monitoring or record keeping requirements for PM compliance. (See IA1 Comment 1)

**c. Opacity**

There are no monitoring or record keeping requirements for Opacity compliance. (See IA1 Comment 2)

**S3. Reporting (Regulation 2.16, section 4.1.9.3)****a. SO<sub>2</sub>**

There are no compliance reporting requirements for this equipment.  
(See IA1 Comment 1)

**b. PM**

There are no compliance reporting requirements for this equipment.  
(See IA1 Comment 1)

**c. Opacity**

There are no compliance reporting requirements for this equipment.

**IA1 Comments**

1. A one-time PM and SO<sub>2</sub> compliance demonstration was 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, record keeping, and reporting requirements for these boilers with respect to PM and SO<sub>2</sub> emission limits.
2. The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard. Therefore, the source is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.
3. Indirect heat exchangers are an affected facility as defined in Regulation 7.06 but meet the definition of insignificant activities per Regulation 2.02, section 2.1.1
4. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.
5. The York Shipley and Fulton boilers are incorporated into the Title V Permit Renewal from the Insignificant Activities Summary Form AP-100P.

**Emission Unit IA2: Core Winders**

**IA2 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
7.08	Standards of Performance for New Process Operations	1, 2, 3, 4, & 5
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 3.2, 4 & 5

<b>IA2 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Stack ID</b>
E33	Core Winder Dust Collection System/Baghouse	7.08	S35
E43-E53	Core Winders	7.08 7.25	N/A

**IA2 Control Devices:** There are no control devices associated with Emission Unit IA2.

**IA2 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

The owner or operator shall not allow or cause VOC emissions to exceed 5 tons from Regulation 7.25 affected facilities during any twelve consecutive month period unless modeling or a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1; Permit 157-09-C, dated August 11, 2009) (See IA2 Comment 2)

**b. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

**c. PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr, per core winder. (Regulation 7.08, section 3.1.2)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

i. The owner or operator shall daily record and maintain the production records of each non-BACT Regulation 7.25 affected facility. (Regulation 1.05, section 4) (See IA2 Comment 2)

ii. The owner or operator shall record by the end of the first week of each month the parameters necessary to calculate the material usages during the previous month from each non-BACT Regulation 7.25 affected facility. By the end of the month, the daily usage of each VOC containing material shall be calculated and recorded, for each process, by proportioning the month's usage of each VOC containing material to the daily production for each process. (Regulation 1.05, section 4)

iii. The owner or operator shall monthly calculate and record the monthly consecutive 12-month total VOC emissions each calendar month to show compliance with the 5 ton per year limit on non-BACT Regulation 7.25 affected facilities.

**b. Opacity**

There are no monitoring or record keeping requirements for Opacity compliance. (See IA2 Comment 3)

**c. PM**

There are no monitoring or record keeping requirements for PM compliance. (See IA2 Comment 4)

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports:

**a. VOC**

For non-BACT affected facilities, the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period.  
(See IA2 Comment 2)

**b. Opacity**

There are no compliance reporting requirements for this equipment.

**c. PM**

The potential uncontrolled emissions of PM do not exceed the allowable emission limit for this equipment; therefore, no compliance monitoring reports are required.

**IA2 Comments**

- The following table lists the core winders which roll and glue paper into tubes and then cut them to length. During the core winding process a VOC adhesive is added to the paper cores.

Core Winder	Core Length	Max Production/8 shift	# of Cores/cycle	ft/hr	
E43	12 $\frac{3}{8}$ "	54,700	Cores	3	7,051
E44	12 $\frac{3}{8}$ "	54,700	Cores	3	7,051
E45	18 $\frac{3}{8}$ "	38,000	Cores	3	7,273
E46	18 $\frac{3}{8}$ "	38,000	Cores	2	7,273
E47	12 $\frac{3}{8}$ "	54,700	Cores	3	7,051
E48	12 $\frac{3}{8}$ "	54,700	Cores	6	7,051
E49	12 $\frac{3}{8}$ "	54,700	Cores	6	7,051
E50	12 $\frac{3}{8}$ "	54,700	Cores	5	7,051
E51	12 $\frac{3}{8}$ "	54,700	Cores	5	7,051
E52	12 $\frac{3}{8}$ "	54,700	Cores	3	7,051
E53	12 $\frac{3}{8}$ "	54,700	Cores	3	7,051

- 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	Baron Still	4.38
U2	E20	Annealing Oven #31	2.26
IA2	E43-E53	Core Winders	0.26
IA3	E56-E63, E89	Ink Jet Printers	1.43
IA4	E72-E77	Line Cartoners	0.23
IA6	E87	Better Engineering Parts Washer	0.07

- The District has determined that no periodic visible emissions surveys are required for this equipment.
- A one-time compliance demonstration was performed for PM for this equipment and the pound per hour standard cannot be exceeded uncontrolled.

5. This equipment meets the definition of insignificant activities per Regulation 2.16, section 1.23.1.
6. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.
7. The Core Winders are incorporated into the Title V Permit Renewal from Construction permit 157-09-C.

**Emission Unit IA3: Carton Labeling Inkjet Printers****IA3 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, & 5

<b>IA3 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E56	Ink Jet Printer, Line W4	7.25	N/A
E57	Ink Jet Printer, Line W5 Foxjet Solo Series 45		
E58	Ink Jet Printer, RK 3 Foxjet Solo Series 45		
E59	Ink Jet Printer, RK 4 Foxjet Solo Series 45		
E60	Ink Jet Printer, Line 7 (L7)		
E61	Ink Jet Printer, Line 8 (L8)		
E62	Ink Jet Printer, Line 6 (L6)		
E63	Ink Jet Printer, Warehouse (WH)		
E89	Backup Ink Jet Printer, Warehouse Line 1 Foxjet Solo Series 45		

**IA3 Control Devices:** There are no control devices associated with Emission Unit IA3.

**IA3 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****VOC**

The owner or operator shall not allow or cause VOC emissions to exceed 5 tons from Regulation 7.25 affected facilities during any twelve consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1; Permit 226-06-C, dated August 31, 2006; Permit 171-09-C, dated August 11, 2009; Permit 171-09-C (R1), dated December 5, 2011) (See IA3 Comment 1)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of five (5) years and make the records readily available to the District upon request.

**VOC**

- i. The owner or operator shall daily record and maintain the production records of each non-BACT Regulation 7.25 affected facility. (Regulation 1.05, section 4) (See IA3 Comment 1)
- ii. The owner or operator shall record by the end of the first week of each month the parameters necessary to calculate the material usages during the previous month from each non-BACT Regulation 7.25 affected facility. By the end of the month, the daily usage of each VOC containing material shall be calculated and recorded, for each process, by proportioning the month's usage of each VOC containing material to the daily production for each process. (Regulation 1.05, section 4)
- iii. The owner or operator shall monthly calculate and record the monthly consecutive 12-month total VOC emissions each calendar month to show compliance with the 5 ton per year limit on non-BACT Regulation 7.25 affected facilities.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for:

**VOC**

For non-BACT affected facilities, the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period.  
(See IA3 Comment 1)

**IA3 Comments**

1. 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	Baron Still	4.38
U2	E20	Annealing Oven #31	2.26
IA2	E43-E53	Core Winders	0.26
IA3	E56-E63, E89	Ink Jet Printers	1.43
IA4	E72-E77	Line Cartoners	0.23
IA6	E87	Better Engineering Parts Washer	0.07

2. This equipment meets the definition of insignificant activities per Regulation 2.16, section 1.23.1.
3. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.
4. The Inkjet Printers are incorporated into the Title V Permit Renewal from Construction permits 226-06-C and 171-09-C.

**Emission Unit IA4: Line Carton Gluers**

**IA4 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.3, 4 & 5
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 3.2, 4 & 5

<b>IA4 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Stack ID</b>
E72	Line 1 Cartoner (RW #1)	6.24	N/A
E73	Line 2 Cartoner (RW #2)	7.25	N/A
E74	Line 3 Cartoner (RW #3)	7.25	N/A
E75	Line 4 Cartoner (RW #4)	7.25	N/A
E76	Line 5 Cartoner (RW #5)	7.25	N/A
E77	Line 6 Cartoner (RW #6)	7.25	N/A

**IA4 Control Devices:** There are no control devices associated with Emission Unit IA2.

**IA4 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****VOC**

- i. For Line 1 Cartoner (RW #1), no owner or operator shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, unless the discharge has been reduced by at least 85% by weight. (Regulation 6.24, section 3.3) (See IA4 Comment 1)
- ii. The owner or operator shall not allow or cause VOC emissions to exceed 5 tons from Regulation 7.25 affected facilities during any twelve consecutive month period unless modeling or a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1; Permit 136-10-C, dated December 28, 2010) (See IA4 Comment 2)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**VOC**

- i. The owner or operator shall daily record and maintain the production records of each non-BACT Regulation 7.25 affected facility. (Regulation 1.05, section 4) (See IA4 Comment 2)
- ii. The owner or operator shall record by the end of the first week of each month the parameters necessary to calculate the material usages during the previous month from each non-BACT Regulation 7.25 affected facility. By the end of the month, the daily usage of each VOC containing material shall be calculated and recorded, for each process, by proportioning the month's usage of each VOC containing material to the daily production for each process. (Regulation 1.05, section 4)
- iii. The owner or operator shall monthly calculate and record the monthly consecutive 12-month total VOC emissions each calendar month to show compliance with the 5 ton per year limit on non-BACT Regulation 7.25 affected facilities.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports:

**VOC**

For non-BACT affected facilities, the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period.  
(See IA4 Comment 2)

**IA4 Comments**

1. The PTE submitted by the source and verified by the District show that the VOC emissions from the RW line 1 cartoning equipment cannot exceed the four hundred and fifty (450) pounds per hour and the three thousand (3,000) pound per day standards of Regulation 6.24, Section 3.3.
2. 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	Baron Still	4.38
U2	E20	Annealing Oven #31	2.26
IA2	E43-E53	Core Winders	0.26
IA3	E56-E63, E89	Ink Jet Printers	1.43
IA4	E72-E77	Line Cartoners	0.23
IA6	E87	Better Engineering Parts Washer	0.07

3. This equipment meets the definition of insignificant activities per Regulation 2.16, section 1.23.1.
4. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.
5. The Line Cartoners are incorporated into the Title V Permit Renewal from Construction permit 136-10-C.

**Emission Unit IA6: Rotomatic Dishwasher****IA6 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, & 5

<b>IA6 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E87	Better Engineering Parts Washer	7.25	N/A

**IA6 Control Devices:** There are no control devices associated with Emission Unit IA6.

**IA6 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****VOC**

The owner or operator shall not allow or cause VOC emissions to exceed 5 tons from Regulation 7.25 affected facilities during any twelve consecutive month period, unless a BACT is submitted and approved by the District. (See IA6 Comment 1)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of five (5) years and make the records readily available to the District upon request.

**VOC**

- i. The owner or operator shall daily record and maintain the production records of each non-BACT Regulation 7.25 affected facility. (Regulation 1.05, section 4) (See IA6 Comment 1)
- ii. The owner or operator shall record by the end of the first week of each month the parameters necessary to calculate the material usages during the previous month from each non-BACT Regulation 7.25 affected facility. By the end of the month, the daily usage of each VOC containing material shall be calculated and recorded, for each process, by proportioning the month's usage of each VOC containing material to the daily production for each process. (Regulation 1.05, section 4)
- iii. The owner or operator shall monthly calculate and record the monthly consecutive 12-month total VOC emissions each calendar month to show compliance with the 5 ton per year limit on non-BACT Regulation 7.25 affected facilities.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for:

**VOC**

For non-BACT affected facilities, the monthly and consecutive 12-month total VOC emissions (in tons) for each calendar month in the reporting period. (See IA6 Comment 1)

**IA6 Comments**

1. 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	Baron Still	4.38
U2	E20	Annealing Oven #31	2.26
IA2	E43-E53	Core Winders	0.26
IA3	E56-E63, E89	Ink Jet Printers	1.43
IA4	E72-E77	Line Cartoners	0.23
IA6	E87	Better Engineering Parts Washer	0.07

2. This equipment meets the definition of insignificant activities per Regulation 2.16, section 1.23.1.
3. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.
4. This equipment is incorporated into the Title V Permit Renewal from the Insignificant Activities Summary Form AP-100P

**Emission Unit IA7: Roll Grinders**

**IA7 Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1, 2, 3.3, 4 & 5

<b>IA7 Equipment</b>			
<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E88	Roll Grinders	6.24	N/A

**IA7 Control Devices:** There are no control devices associated with Emission Unit IA7.

**IA7 Specific Conditions**

**S1. Standards (Regulation 2.16, section 4.1.1)**

**VOC**

No owner or operator shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, unless the discharge has been reduced by at least 85% by weight. (Regulation 6.24, section 3.3). (See IA7 Comment 1)

**S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

**VOC**

There are no monitoring or record keeping requirements for VOC compliance. (See IA7 Comment 1)

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

**VOC**

There are no compliance reporting requirements for this equipment. (See IA7 Comment 1)

**IA7 Comments**

1. The PTE submitted by the source and verified by the District show that the VOC emissions from the Roll Grinders cannot exceed the four hundred and fifty (450) pounds per hour and the three thousand (3,000) pound per day standards of Regulation 6.24, Section 3.3.
2. This equipment meets the definition of insignificant activities per Regulation 2.16, section 1.23.1.
3. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.
4. This equipment is incorporated into the Title V Permit Renewal from the Insignificant Activities Summary Form AP-100P

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