AIR POLLUTION CONTROL CONSTRUCTION PERMIT

EI FACILITY NO: 341158070 CONSTRUCTION PERMIT NO.: 14-RSG-142

TYPE: Construction permit for the whole facility

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: CLCM - St. Francis

Street Address: 3950 South Pennsylvania Avenue,
Saint Francis, Milwaukee County, Wisconsin

Responsible Official, & Title: Mark Furgason, Site Manager

is authorized to construct and initially operate a paint booth and several other sources related to drum reclamation described in the plans and specifications dated August 11, 2014 (application received), August 14, 20, 22, 2014 (additional information submitted), December 5, 8, 22, 29, 2014 (additional information submitted), January 13, 2015 (additional information submitted) , February 19 and 25 , 2015 (elected changes during public comment period), March 5, 2015 (elected methylen e chloride solvent usage limit) in conformity with the conditions herein . The authority to construct, modify, replace and/or reconstruct any process covered in this Construction Permit expires eighteen (18) months from the date of issuance. This approved p eriod to construct, modify, replace and/or reconstruct may be extended for up to 18 months upon request for cause, prior to expiration, unless otherwise specified by this construction permit. The conditions of this construction permit are permanent and may only be revised through a revision of the construction permit or through the issuance of a new construction permit. [s. 285.60(1), Wis. Stats.]

Conditions of the construction permit marked with an asterisk (*) have been created outside of the Wisconsin's federally approved State Implementation Plan (SIP) and are not federally enforceable.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Milwaukee, Wisconsin March 9, 2015

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By /s/ Daniel Schramm
Daniel H. Schramm
Air Management Supervisor
Milwaukee Service Center

Part I

A. Process P44, Stack(s) <none> – Label Stripping		
1. Volatile Organic Compounds.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Latest Available Control Technology (LACT) applies to this proc ess. LACT is determined to be: **(a)** VOC content of solvent solution(s) used in P44 may not exceed 1.52 pounds per gallon; and **(b)** Amount of VOC containing solven ts used in P44 may not exceed 19 0 gallons per month , averaged over any 12 consecutive calendar month period. **(c)** good operating practices. **[s. NR 424.03(2)(c), Wis. Adm. Code (permit 14-RSG-142)]** Note: The above condition restricts potential VOC emissions from P44 to ~ 1.73 tons per year. There is no usage restriction for solv ents containing no VOCs (e.g. acetone – acetone is not a VOC). **(2)** Good operating practices required in condition (1)(c) above shall include all of the following: **(a)** Immediately after use, place all rags, or any other porous material used to apply solvent, in a covered container (labeled as waste solvent), and handled in accordance with local, state and federal regulations. **(b)** Store waste solvent only in covered	**(1)** Within 15 days after each month, the permittee shall determine and record the following: **(a)** the quantity (in gallons) and identity of each solvent used during the month; **(b)** the amount of all VOC containing solvents used (in gallons) during the month; **(c)** the amount of all VOC containing solvents used (in gallons/month), averaged over any 12 consecutive calendar month period. **[s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]**	**(1)** The permittee shall keep records describing the good operating practices being implemented for these processes. **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code]** **(2)** The permittee shall collect and record the following information: **(a)** A unique name or id entification number for each solvent , as applied. **(b)** The VOC content of each solvent (in pounds per gallon), as applied. Record 0 lb/gallon for any solvent used in P44 that does not contain any VOCs. **(c)** MSDS or equivalent document for each solvent which contains information to determine VOC content (or lack of VOC) of the solvent. **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code, s. NR 439.04(5)(d)1, Wis. Adm. Code (permit 14 - RSG-142)]** **(3)** The permittee shall keep records required in condition I.A.1.b.(1). **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code (permit 14-RSG-142)]**

A. Process P44, Stack(s) <none> – Label Stripping		
containers labeled as waste solvent and handled in accordance with local, state and federal regulations. **(c)** Follow operating procedures which prevent solvent from dripping from the applicator during solvent application. **[ss. NR 424.03(2)(c), and NR 407.09(4)(a)3.b., Wis. Adm. Code , s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]** **(3)** See condition I.ZZZ.1.a.(1)		

Notes: (1) P44 currently uses a solvent that contains 8.59 lb/gal methylene chloride and 1.52 lb/gal VOC [Ref. permit application]. Condition I.ZZZ.1.b.(1) of this permit restricts methylene chloride containing solvent usage in P44 to 140 gal/month on a 12-month rolling average basis. Because the solvents currently used in P44 contain methylene chloride (not a VOC) and VOCs, effective VOC containing solvent usage limit is 140 gallons (< 190 gallons) per month averaged over any 12 consecutive month period. With a VOC content limit of 1.52 lb/gal, and VOC solvent usage limit of 190 gallons per month (on a 12-month rolling average), potential VOC emissions from P44 are 288.8 pounds per month on a 12-month rolling average basis.
(2) The permit has a VOC emission limit of 4,000 pounds per month (averaged over any 12 consecutive months) for P44 and P45 combined in condition I.ZZZ.1.a.(4).

A. Process P44, Stack(s) <none> – Label Stripping
2. Hazardous Air Pollutants.
a. Conditions
(1) See section I.ZZZ.1. for federal HAP emission restrictions for the facility to be a synthetic minor (area) source for federal HAPs. Note: The source submitted information to indicate that the indoor methylene chloride emissions are exempt (as per s. NR 445. 07(5)(d)2., Wis. Adm. Code) from requirements under s. NR 445.07, Wis. Adm. Code.

B. Process P80A, Control C10, Stack S98 – Interior Caustic Preflush (steel drums, plastic drums/containers)
Process P80B, Control C10, Stack S98 – Exterior Wash/Soaker (plastic drums/containers)
Process P80C, Control C10, Stack S98 – Exterior Rinse (plastic drums/containers)
Process P42, Control C10, Stack S98 – Internal Drum Washer (plastic drums/containers)
Process P95, Control C10, Stack S98 – Drum-Caustic Pre-Flush (plastic drums/containers)
Process P72, Control C10, Stack S98 – Exterior Wash/Soaker (steel drums)
Process P73, Control C10, Stack S98 – Exterior Rinse (steel drums)
Process P74, Control C10, Stack S98 – Internal Double Split Washer (steel drums)

1. Sodium Hydroxide (NaOH) Emissions.

a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient concentration of sodium hydroxide off the source property that exceeds 200 micrograms per cubic meter (per 1 hour). **[s. NR 445.07(1)(a), Wis. Adm. Code (permit 14-RSG-142)]**	**(1)** Emissions shall be controlled by a wet scrubber (C10) equipped with a demister (mist eliminator) prior to exhausting via stack S98. **[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]** **(2)** The permittee shall maintain: **(a)** the pressure drop across the scrubber and demister within the pressure drop range (in inches of water column) recommended by the manufacturer or within a range approved by the Department; **(b)** the liquor flow rate through the scrubber at the flow rate (in gallons per minute) recommended by the manufacturer or at a rate approved by the Department. **(c)** the scrubber liquid pH between the range 5 to 9 by adding either NaOH or HCl as needed. **[ss. NR 439.055(1)(e), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]** **(3)** The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time inte rval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and maintenance/repair (as necessary) of:	**(1)** Whenever emission testing is required to demonstrate compliance , the permittee shall use methods and plans approved , in writing , by the Department to determine NaOH emission rate or concentration. **[s. NR 439.06(8), Wis. Adm. Code, s. 285.65(3), Wis. Stats.]** **(2)** The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements: **(a)** the pressure drop across the scrubber and demister; **(b)** the liquor flow rate through the scrubber. **[ss. NR 439.055(2)(b), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14 - RSG-142)]** **(3)** The permittee shall keep records of: **(a)** the date, time, and initials of the person performing the required periodic inspections; **(b)** a list of the items inspected; and **(c)** any maintenance or repairs performed as a result

B. Process P80A, Control C10, Stack S98 – Interior Caustic Preflush (steel drums, plastic drums/containers) Process P80B, Control C10, Stack S98 – Exterior Wash/Soaker (plastic drums/containers) Process P80C, Control C10, Stack S98 – Exterior Rinse (plastic drums/containers) Process P42, Control C10, Stack S98 – Internal Drum Washer (plastic drums/containers) Process P95, Control C10, Stack S98 – Drum-Caustic Pre-Flush (plastic drums/containers) Process P72, Control C10, Stack S98 – Exterior Wash/Soaker (steel drums) Process P73, Control C10, Stack S98 – Exterior Rinse (steel drums) Process P74, Control C10, Stack S98 – Internal Double Split Washer (steel drums)		
	(a) the spray nozzle(s) for signs of corrosion and plugging; **(b)** inlet and outlet ducts for plugging and leaks; **(c)** the pumping system, suction pipe, and pumping system valves; & **(d)** the mist eliminator for signs of corrosion and plugging. **[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]**	of these inspections. **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14 - RSG-142)]**

Note: S98 is a vertical unobstructed stack with a stack height of 43 feet.

B. Process P80A, Control C10, Stack S98 – Interior Caustic Preflush (steel drums, plastic drums/containers) Process P80B, Control C10, Stack S98 – Exterior Wash/Soaker (plastic drums/containers) Process P80C, Control C10, Stack S98 – Exterior Rinse (plastic drums/containers) Process P42, Control C10, Stack S98 – Internal Drum Washer (plastic drums/containers) Process P95, Control C10, Stack S98 – Drum-Caustic Pre-Flush (plastic drums/containers) Process P72, Control C10, Stack S98 – Exterior Wash/Soaker (steel drums) Process P73, Control C10, Stack S98 – Exterior Rinse (steel drums) Process P74, Control C10, Stack S98 – Internal Double Split Washer (steel drums)		
2. Visible Emissions.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Number 1 of the Ringlemann chart or 20% opacity. **[s. NR 431.05 , Wis. Adm. Code (permit 14-RSG-142)]**	**(1)** The compliance demonstration requirements for sodium hydroxide emissions shall also serve as a compliance demonstration method for visible emissions. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]**	**(1)**Whenever visible emission testing is required to demonstrate compliance , the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing . **[ss. NR 407.09(1)(c)1.a., and NR 439.06(9)(a)1., Wis. Adm. Code]** **(2)** The recordkeeping and monitoring requirements in I.B.1.c.(2) & (3) will also serve to demonstrate compliance for visible emissions. **[s. NR 407.09(4)(a), Wis. Adm. Code]**

C. Process P12, Control C10, Stack(s) S92, S98 – Water Heater 4 (2.0 MMBtu/hr Natural Gas Fired)
Process P13, Control C10, Stack(s) S93, S98 – Oil/Water Heater 3 (2.0 MMBtu/hr Natural Gas Fired)
Process P14, Control C10, Stack(s) S94, S98 – Caustic Heater 2 (3.6 MMBtu/hr Natural Gas Fired)
Process P15, Control C10, Stack(s) S95, S98 – Caustic Heater 1 and 2,000 gallon tank (2.0 MMBtu/hr Natural Gas Fired)
Process P42C, Control <none>, Stack S62 – Hot Water Heater (1.75 MMBtu/hr Natural Gas Fired)
Process P41, Control C10, Stacks(s) S96, S98 – Drying Oven/Flamer (0.6 MMBtu/hr Natural Gas Fired)

Note: Natural gas combustion products from P12, P13, P14, P15, P42C, and P41 are exhausted via stacks S92, S93, S94, S95, S62 and S96, respectively. Only Mists/vapors generated from the processes are sent to the scrubber.

1. Particulate Matter Emissions.

a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) For each stack S92, S93, S94, S95, S62, S96: Particulate matter emissions may not exceed 0.15 pounds of particulate matter per million Btu heat input. **[s. NR 415.06(2)(a), Wis. Adm. Code (permit 14-RSG-142)]** **(2)(a)** Height of each stack S92, S93, S94, S95 shall be at least 25 feet above ground level. **(b)** Height of each stack S62 and S96 shall be at least 28 feet above ground level. **[s. NR 404.08(2), Wis. Adm. Code, ss. 285.65(3), (7), Wis. Stats. (permit 14 -RSG-142)]** Note: The above stack height condition s are included so that the facility-wide modeled $PM_{2.5}$ – 24 hr concentration (facility impact + background conc.) does not exceed the ambient air quality (24 -hr) standard for $PM_{2.5}$. Stacks S62, S92, S93, S94, and S95 have rain hats. Exhaust from S96 is passive (modeled as if S96 has a rain hat).	**(1)** Only natural gas shall be combusted in the heaters and in the oven. **[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]**	**(1)** Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissio ns (U.S. EPA Method 202) or an other test method approved by the Department in writin g. **[ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1. a., Wis. Adm. Code (permit 14-RSG-142)]** **(2)** The permittee shall keep month ly records of type(s) of fuel used in each process . **[ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code (permit 14-RSG-142)]** **(3)** The permittee shall keep and maintain onsite technical drawings, blueprints or equivalent records of the physical stack parameters. **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]**

C. Process P12, Control C10, Stack(s) S92, S98 – Water Heater 4 (2.0 MMBtu/hr Natural Gas Fired) Process P13, Control C10, Stack(s) S93, S98 – Oil/Water Heater 3 (2.0 MMBtu/hr Natural Gas Fired) Process P14, Control C10, Stack(s) S94, S98 – Caustic Heater 2 (3.6 MMBtu/hr Natural Gas Fired) Process P15, Control C10, Stack(s) S95, S98 – Caustic Heater 1 and 2,000 gallon tank (2.0 MMBtu/hr Natural Gas Fired) Process P42C, Control <none>, Stack S62 – Hot Water Heater (1.75 MMBtu/hr Natural Gas Fired) Process P41, Control C10, Stacks(s) S96, S98 – Drying Oven/Flamer (0.6 MMBtu/hr Natural Gas Fired)		
2. Visible Emissions.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Number 1 of the Ringlemann chart or 20% opacity. **[s. NR 431.05, Wis. Adm. Code (permit 14 - RSG-142)]**	**(1)** Only natural gas shall be combusted in the heaters and in the oven. **[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]**	**(1)** Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. **[ss. NR 407.09(1)(c)1.a. and NR 439.06(9)(a)1., Wis. Adm. Code]** **(2)** The recordkeeping requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. **[s. NR 407.09(4)(a), Wis. Adm. Code]**

D. Process P45, Stack(s) <none> – Plastic Drum Wipe Cleaning		
1. Volatile Organic Compounds.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Latest Available Control Technology (LACT) applies to this process. LACT is determined to be: **(a)** VOC content of solvent solution(s) used in P45 may not exceed 0.42 pounds per gallon; **(b)** Amount of VOC containing solvent usage may not exceed 2,000 gallons per month, averaged over any 12 consecutive calendar month period.; and **(c)** good operating practices. **[s. NR 424.03(2)(c), Wis. Adm. Code (permit 14-RSG-142)]** Note: The above condition restricts potential VOC emissions from P44 to 5.04 tons per year. There is no usage restriction for solvents containing no VOCs (e.g. acetone – acetone is not a VOC). **(2)** Good operating practices required in condition (1)(c) above shall include all of the following: **(a)** Immediately after use, place all rags, or any other porous material used to apply solvent, in a covered container (labeled as waste solvent), and handled in accordance with local, state and federal regulations. **(b)** Store waste solvent only in covered	**(1)** Within 15 days after each month, the permittee shall determine and record the following: **(a)** the quantity (in gallons) and identity of each solvent used during the month; **(b)** the amount of all VOC containing solvents used (in gallons) during the month; **(c)** the amount of all VOC containing solvents used (in gallons/month), averaged over any 12 consecutive calendar month period. **[s. 285.65(3), Wis. Stats. (permit 14 -RSG-142)]** [see Note (2)]	**(1)** The permittee shall keep records describing the good operating practices being implemented for these processes. **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code (permit 14-RSG-142)]** **(2)** The permittee shall collect and record the following information: **(a)** A unique name or identification number for each solvent, as applied. **(b)** The VOC content of each solvent (in pounds per gallon), as applied. Record 0 lb/gallon for any solvent used in P45 that does not contain any VOCs. **(c)** MSDS or equivalent document for each solvent which contains information to determine VOC content of the solvent. **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code, s. NR 439.04(5)(d)1, Wis. Adm. Code (permit 14-RSG-142)]** **(3)** The permittee shall keep records required in condition I.D.1.b.(1). **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code (permit 14-RSG-142)]**

D. Process P45, Stack(s) <none> – Plastic Drum Wipe Cleaning		
containers labeled as waste solvent and handled in accordance with local, state and federal regulations. **(c)** Follow operating procedures which prevent solvent from dripping from the applicator during solvent application. **[ss. NR 424.03(2)(c), and NR 407.09(4)(a)3.b., Wis. Adm. Code , s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]** **(3)** See condition I.ZZZ.1.a.(1)		

Notes:(1) P45 currently uses acetone (which is not a VOC) as the solvent. Permit application requests flexibility to use VOC containing solvents.
(2) The permit contains an elected VOC emission limit of 4,000 pounds per month (averaged over any 12 consecutive months) for P44 and P45 combined in condition I.ZZZ.1.a.(4) .

D. Process P45, Stack(s) <none> – Plastic Drum Wipe Cleaning
2. Hazardous Air Pollutants.
a. Conditions
(1) The permittee shall not use HAP-containing solvent in Process P45. **[s. 285.65(7), Wis. Stats. (permit 14-RSG-142)]** **(2)** The permittee shall collect and record the following information for Process P45: **(a)** A unique name or identification number for each solvent, as applied. **(b)** The HAP content of each solvent (in pounds per gallon), as applied. **(c)** MSDS or equivalent document for each solvent which contains information to determine HAP content of the solvent or lack of HAP in the solvent. **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code, s. NR 439.04(5)(d)1, Wis. Adm. Code (permit 14-RSG-142)]**

E. Process P71, Stack(s) <none> – Steel Drum Delabeling		
1. Volatile Organic Compounds.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Solvents used in P71 shall not contain volatile organic compounds (VOCs). **[s. 285.65(7), Wis. Stats. (permit 14-RSG-142)]**	**(1)** Within 15 days after each month, the permittee shall determine and record the following: **(a)** the identity and the quantity of each solvent used during the month (in gallons). **[s. 285.65(3), Wis. Stats. (permit 14 - RSG-142)]**	**(1)** The permittee shall collect and record the following information: **(a)** A unique name or identification number for each solvent, as applied. **(b)** The VOC content of each solvent (in pounds per gallon), as applied. Record 0 lb/gallon for any solvent used in P71 that does not contain any VOCs. **(c)** MSDS or equivalent document for each solvent which contains information to determine VOC content (or lack of VOCs) of the solvent. **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code, s. NR 439.04(5)(d)1, Wis. Adm. Code (permit 14-RSG-142)]** **(2)** The permittee shall keep records required in condition I.E.1.b.(1). **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code (permit 14-RSG-142)]**

Notes: (1) The condition I.E1.a.(1) avoids P71 being subject to s. NR 423.03(7), Wis. Adm. Code. The condition I.E1.a.(1) [along with elected VOC content/usage limitations in P44, P45, P32C] results in facility-wide potential VOC emissions being less than 79 TPY.

E. Process P71, Stack(s) <none> – Steel Drum Delabeling
2. Hazardous Air Pollutants.
a. Conditions
(1) The permittee shall not use HAP-containing solvent in Process P71. **[s. 285.65(7), Wis. Stats. (permit 14-RSG-142)]** **(2)** The permittee shall collect and record the following information for Process P71: **(a)** A unique name or identification number for each solvent, as applied. **(b)** The HAP content of each solvent (in pounds per gallon), as applied. **(c)** MSDS or equivalent document for each solvent which contains information to determine HAP content of the solvent or lack of HAP in the solvent. **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code, s. NR 439.04(5)(d)1, Wis. Adm. Code (permit 14-RSG-142)]**

F. Process P75; Control C70 (Acid Scrubber), C10; Stack S98 – Acidizer		
1. Hydrochloric Acid.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient c oncentration of hydrochloric acid off the source property that exceeds 7 46 micrograms per cubic meter (1 hour) or 20 micrograms per cubic meter (annual). **[s. NR 445.07(1)(a), Wis. Adm. Code (permit 14 - RSG-142)]**	**(1)** Emissions from P75 shall be controlled by an acid scrubber (C70) followed by wet scrubber C10. **[ss. 285.65(3),(7), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code(permit 14-RSG-142)]** **(2)** The permittee shall maintain: **(a)** the pressure drop across the acid scrubber within the pressure drop range (in inches of water column) recommended by the manufacturer or within a range approved by the Department; **(b)** the liquor flow rate through the acid scrubber at the flow rate (in gallons per minute) recommended by the manufacturer or at a rate approved by the Department. **[ss. NR 439.055(1)(e), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]** **(3)** See requirements for wet scrubber C10 in section I.B of this permit.	**(1)** The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements: **(a)** the pressure drop across the acid scrubber; **(b)** the liquor flow rate through the acid scrubber. **[ss. NR 439.055(2)(b), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]** **(2)** See requirements for wet scrub ber C10 in section I.B of this permit.

G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth
Process P32B, Control <none>, Stack S12B – Curing Oven (2.6 MMBtu/hr Natural Gas Fired)
Process P50C, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)

1. Particulate Matter (PM)/PM_{10}/$PM_{2.5}$ Emissions.

a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) For P32C/Stack S12C , the more restrictive of: **(a)** 0.40 lb. particulate matter per 1000 pounds of gas. **(b)** $E = 3.59P^{0.62}$ Where, E= allowable particulate matter emissions in pounds per hour; P= process weight rate in tons per hour. **[ss. NR 415.05(1)(o), NR 415.05(2), Wis. Adm. Code (permit 14-RSG-142)]** **(2)** For P32B/stack S12B, 0.15 pounds particulate matter per million Btu heat input. **[s. NR 415.06(2)(a), Wis. Adm. Code (permit 14-RSG-142)]** **(3)** For P50C/stack S53, 0.15 pounds particulate matter per million Btu heat input. **[s. NR 415.06(2)(a), Wis. Adm. Code (permit 14-RSG-142)]** **(4)** PM_{10} or $PM_{2.5}$ missions may not exceed the following: **(a)** 0.287 pounds PM_{10} per hour from stack	**(1)** Whenever the spray booth (P32C) is in operation, particulate matter emissions sha ll be controlled by an overspray filter (C32C). **[s. 285.65(3), Wis. Stats. , s. NR 407.09(4)(a)3.b., Wis. Adm. Code(permit 14-RSG-142)]** **(2)** The dry filters used in process P32C shall have a particulate matter control efficiency of at least 99%. **[s. 285.65(7), Wis. Stats. (permit 14 -RSG-142)]** **(3)** Only natural gas shall be fired in the curing oven (P32B) and in the closed drum drying oven (P50C). **[s. 285.65(7), Wis. Stats. (permit 14 -RSG-142)]** **(4)** The permittee shall perform daily inspections of the overspray filter C32C (on days of operation) to ensure that the control equipment is operating properly.**[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code (permit 14-RSG-142)]** **(3)(a)** Whenever painting is in operation, the permittee shall operate the general building exhaust fan(s) that vents exhaust from P32C to the atmosphere via stack S12C. **(b)** Respective building exhaust fan(s) shall be operated such that exhaust from overspray filter are vented to the atmosphere (via stack S12C) at a flow rate of 15,000 acfm or greater when the	**(1)** Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissio ns (U.S. EPA Method 202) or an other test method approved by the Department in writing . **[ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1. a., Wis. Adm. Code (permit 14-RSG-142)]** **(2)** The permittee shall keep daily records of filter inspections. The permittee shall also keep records of filter replacements including date(s) of replacement for spray booth process (P32C). **[s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]** **(3)** The permittee shall maintain records that indicate the particulate matter control efficiency of the filters used in P32C. **[s. NR 439.04(1)(d), Wis. Adm. Code (permit 14 -RSG-142)]** **(4)** The permittee shall keep documentation (e.g. design specifications, test data, etc.) to demonstrate that the respective building exhaust fan(s) can meet the requirements in condition I.G.1.b(3)(b) at normal operating conditions. **[s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]** **(5)** The permittee sh all keep and maintain onsite technical drawings, blueprints or equivalent records of the physical stack parameters. **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]**

G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth Process P32B, Control <none>, Stack S12B – Curing Oven (2.6 MMBtu/hr Natural Gas Fired) Process P50C, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)		
S12C **(b)** 0.287 pounds $PM_{2.5}$ per hour from stack S12C **[s. NR 404.08(2), Wis. Adm. Code, ss. 285.65(3) &(7), Wis. Stats. (permit 14 -RSG-142)]** **(5)(a)** Height of each stack S53, S12B , and S12C shall be at least 3 5 feet above ground level. **(b)** Stack S53 shall have an out let stack inside diameter of no greater than 1.0 feet. **(c)** Stack S12C shall have an outlet stack inside diameter of no greater than 2.17 feet. **(d)** Stacks S53 and S12C shall exhaust vertically upwards with no obstruction. **[s. NR 404.08(2), Wis. Adm. Code, s s. 285.65(3), (7), Wis. Stats. (permit 14 -RSG-142)]** Note: The above stack height conditions are included so that the facility-wide modeled $PM_{2.5}$ – 24 hr concentration (facility impact + background conc.) does not exceed the ambient air quality (24 -hr) standard for $PM_{2.5}$. Stack S12B has an obstruction (rain hat).	paint booth is in operation. **[ss. 285.65(3) &(7), Wis. Stats. (permit 14-RSG-142)]**	

G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth Process P32B, Control <none>, Stack S12B – Curing Oven (2.6 MMBtu/hr Natural Gas Fired) Process P50C, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)		
2. Visible Emissions.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) Number 1 of the Ringlemann chart or 20% opacity. **[s. NR 431.05 , Wis. Adm. Code (permit 14-RSG-142)]**	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]**	**(1)**Whenever visible emission testing is required to demonstrate compliance , the permittee shall use U.S. EPA Method 9. **[s. NR 439.06(9)(a)1., Wis. Adm. Code (permit 14-RSG-142)]** **(2)** The recordkeeping and monitoring requirements for particulate matter emissions will also serv e to demonstrate compliance for visible emissions . **[s. NR 407.09(4)(a) , Wis. Adm. Code]**

G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth Process P32B, Control <none>, Stack S12B – Curing Oven (2.6 MMBtu/hr Natural Gas Fired) Process P50C, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)		
3. VOC Emissions.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) No owner or operator of a miscellaneous metal parts or products coating line using baked or cured coating technology may cause, allow or permit the emission of any VOCs in excess of: **(a)** 4.3 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies clear coatings. **(b)** 3.5 pounds per gallon of coating, excluding	**(1)(a)** The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. **(b)** The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon. **[s. NR 407 .09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]**	**(1)** Whenever the organic solvent content, the volume of solids, the weight of solids, the water content and the densi ty of surface coatings is required to demonstrate compliance, the permittee shall use U.S. EPA Method 24 or 24A or another test method approve d by the Department in writing . **[ss. NR 439.06(3)(b), and NR 407.09(1)(c)1.a. , Wis. Adm. Code (permit 14-RSG-142)]** **(2)** The permittee shall keep the following records: **(a)** A unique name or identification number for each coating, as applied.

G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth
Process P32B, Control <none>, Stack S12B – Curing Oven (2.6 MMBtu/hr Natural Gas Fired)
Process P50C, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)

water, delivered to a coating applicator that applies extreme performance coatings.

(c) 3.0 pounds per gallon of coating, excluding water, delivered to a coating applicator for all other coatings.
[s. NR 422.15(2), Wis. Adm. Code (permit 14-RSG-142)]
Note: P32C only uses coatings described in (1)(b) above ('extreme performance coatings')

(2)(a) The VOC content of coatings, as applied, shall not exceed 3.5 pounds per gallon.

(b) Cleanup solvents used in P32C shall not contain VOCs.

[s. 285.65(7), Wis. Stats. (permit 14 -RSG-142)]

Note: Facility indicated that acetone will be used as cleanup solvent. Acetone is not a VOC.

(3) Amount of coatings used, as applied, may not exceed 3,200 gallons per month , averaged over any 12 consecutive calendar month period. **[s. 285.65(7), Wis. Stats. (permit 14 - RSG-142)]**

(4) The permittee shall:
(a) Store all VOC -containing cleaning materials and shop towels used for cleaning in closed containers.
(b) Ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing material.
(c) Convey VOC -containing cleaning materials in closed containers or pipes.
(d) Minimize spills of VOC - containing

(2) If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to each coating applicator as follows:

VOCa = [(VOCc x Qc) + (VOCt x Qt)]/(Qc + Qt)

where:

VOCa = the VOC content of the coating as delivered to the coating applicator, in pounds per gallon excluding water;

VOCc = the VOC content of the coating as received, in pounds per gallon, excluding water;

Qc = the amount of coating as received that mixed with thinner prior to application, in gallons , excluding water;

VOCt = the VOC content of the thinner as received, in pounds per gallon, excluding water;

Qt = the amount of thinner add ed, in gallons, excluding water.

[s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]

(3) The perm ittee shall prepare following records, within 15 days after end of each calendar month:

(a) the quantity (in gallons), as applied, and identity of each coating used during the month;

(b) the quantity (in gallons) and identity of each cleanup solvent used during the month;

(c) the amount of all coatings used (in gallons),

(b) A unique name or identification number for each coating, cleanup solvent and thinner, as received.
(c) The VOC content of each coating (in pounds per gallon), as applied.
(d) The VOC content of each coating, as applied, in units of pounds VOC per gallon, excluding water.
(e) The VOC content of each coating, thinner and cleanup solvent, as received.
(f) If coatings as received are thinned prior to use, the quantities Q_c and Q_t needed to calculate VOC_a as described in Condition I.G.3.b.(2).
(g) MSDS or equivalent document for each coating, solvent which contains information to determine VOC content of the coating or solvent.

[ss. NR 407.09(4)(a)1., NR 439.04(1)(d), and NR 439.04(5)(a), Wis. Adm. Code (permit 14-RSG-142)]

(3) The permittee shall keep records required in condition I.G.3.b.(3).

[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code (permit 14-RSG-142)]

G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth Process P32B, Control <none>, Stack S12B – Curing Oven (2.6 MMBtu/hr Natural Gas Fired) Process P50C, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)		
cleaning materials. **(e)** Minimize emissions of VOC during cleaning of coating applicator, storage, mixing, and conveying equipment by ensuring that cleaning is performed without atomizing any VOC-containing cleaning material and that the used material is captured and contained. **[s. NR 422.15(9), Wis. Adm. Code (permit 14-RSG-142)]**	as applied, during the month; **(d)** the amount of all coatings used (in gallons/month), as applied, averaged over any 12 consecutive calendar month period. **[s. NR 439.04(1)(d), Wis. Adm. Code, and s. 285.65(10), Wis. Stats. (permit 14-RSG-142)]**	

G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth Process P32B, Control <none>, Stack S12B – Curing Oven (2.6 MMBtu/hr Natural Gas Fired) Process P50C, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)		
4. HAP Emissions.		
a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
(1) The permittee shall meet all applicable requirements in section I.H (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. **[Subchapter V of s. NR 465, Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]**	**(1)** The permittee shall comply with all applicable compliance demonstration requirements in section I.H (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. **[Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]**	**(1)** The permittee shall meet all applicable requirements in section I.H (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. **[Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a) , Wis. Adm. Code, s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]**

H. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products
[Chapter NR 465, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]

1. Condition Type: Emission Limits

a. Conditions:

(1) For the general use coating affected source, limit organic HAP emissions to no more than 0.31 kg of organic HAP per liter (2.6 lb/gallon) of coating solids used during each 12−month compliance period.

[s. NR 465.43(1)(b)1., Wis. Adm. Code, 40 CFR §63.3890(b)(1), s. 285.65(13), Wis. Stats. (permit 14-RSG-142)]

(2) The facility's miscellaneous metal parts and products coating operations falls under only the general use coating sub-category of the NESHAP. Therefore, emission limits applicable for other coating sub-categories (viz. high performance coating, magnet wire coating, rubber-to-metal coatings, and extreme performance fluoropolymer coatings) are not included in this permit. NESHAP requirements included in this permit pertain to general use coating sub-category only. If facility operations fall under one or more of the other coating sub-categories, permittee shall comply with all applicable emission limits and requirements in subchapter V of s. NR 465, Wis. Adm. Code.

[Subchapter V of s. NR 465, Wis. Adm. Code, 40 CFR part 63, subpart MMMM, ss. 285.65(3),(13), Wis. Stats. (permit 14-RSG-142)]

(3) The affected source is the collection of all of the items listed in (a) to (d) below that are used for surface coating of miscellaneous metal parts and products within each* sub-category:

(a) All coating operations.

(b) All storage containers and mixing vessels in which coatings, thinners and other additives, and cleaning materials are stored or mixed.

(c) All manual and automated equipment and containers used for conveying coatings, thinners and other additives, and cleaning materials.

(d) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

*Since all coating operations at the facility are under the general use coating sub-category, there is only one affected source at the facility consisting of applicable items in *(2)*(a)-(d), above.

[s. NR 465.41(3), Wis. Adm. Code, 40 CFR §63.3882(b), s. 285.65(13), Wis. Stats. (permit 14-RSG-142)]

H. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 465, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]

2. Condition Type: Compliance Options

a. Conditions:

(1) You shall include all coatings, thinners and other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Condition I.H.1.a.(1). To mak e this determination, you shall use at least one of the compliance options listed in Conditions I.H.2.a.(2) and (3). You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the ent ire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you shal l document this switch as required by Condition I.H.5.a.(1)(c), and you shall report it in the next semiannual compliance report required in Condition I.H.4. **[s. NR 465.43(2), Wis. Adm. Code, 40 CFR 63.3891, s. 285.65(13), Wis. Stats. (permit 14-RSG-142)]**

(2) *Compliant material option.* You shall meet all the requirements of section I.H .4. of this permit to demonstrate compliance with the emission limit in Condition I.H.1.a.(1) using this option. To use this option, you shall demonstrate that the organic HA P content of each coating used in the coating operation or operations is less than or equal to the emission limit in Condition I.H.1.a.(1), and that each thinner and other additive, and cleaning material used contains no organic HAP. **[s. NR 465.43(2)(a), Wis. Adm. Code, 40 CFR §63.3891(a), s. 285.65(13), Wis. Stats. (permit 14-RSG-142)]**

(3) *Emission rate without add-on controls option.* You shall meet all the requirements of s. NR 465.47 , Wis. Adm. Code to demonstrate compliance with the emission limit in Condition I.H.1.a.(1) using this option. To use this option, you shall demonstrate that, based on the coatings, thinners and other additives, and cleaning materials used in the coating operation or operations, the organic HAP emission rate for the coating o peration or operations is less than or equal to the emission limit in Condition I.H.1.a.(1), calculated as a rolling 12−month emission rate and determined on a monthly basis. **[s. NR 465.43(2)(b), Wis. Adm. Code, 40 CFR 63.3891(b), s. 285.65(13), Wis. Stats. (permit 14-RSG-142)]**

Note: Add -on controls option is not included in this permit as the facility does not use add -on control equipment to demonstrate compliance.

H. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products
[Chapter NR 465, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]

3. Condition Type: General Compliance Requirements

a. Conditions:

(1) Any coating operation for which you use the compliant material option or the emission rate without add -on controls option shall be, as specified in s. NR 465.43 (2) (a) and (b), in compliance with the emission limit in Condition I.H.1.a.(1) at all times. **[s. NR 465.44(1)(a)1., Wis. Adm. Code; 40 CFR 63.3900(a)(1) , s. 285.65(13), Wis. Stats. (permit 14 -RSG-142)]**

(2) You shall always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this section, according to the provisions in s. NR 460.05 (4) (a)1, Wis. Adm. Code. **[s. NR 465.44(1)(b), Wis. Adm. Code, 40 CFR 63.3900(b) , s. 285.65(13), Wis. Stats. (permit 14 -RSG-142)]**

(3) You shall comply with the applicable general provisions requirements in ch. NR 460, Wis. Adm. Code. Appendix MMMM in ch. NR 460 shows which parts of the general provisions in ch. NR 460 apply to you.

[s. NR 465.44(2), Wis. Adm. Code, 40 CFR 63.3901, s. 285.65(13), Wis. Stats. (permit 14-RSG-142)]

H. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products
[Chapter NR 465, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]

4. Condition Type: Compliant Material Option

a. Conditions:

(1) Demonstration of Continuous Compliance with the Emission Limit in I.H.1.a.(1) Using Compliant Material Option

(a) For each compliance period, to demonstrate continuous compliance, you may not use any coating for which the organic HAP content, determined using Equation 1 below, exceed the emission limit in condition I.H.1.a.(1), and you may not use any thinner or other additive, or cleaning material that contains organic HAP, determined according to s. NR 465.46(2)(a), Wis. Adm. Code. A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in s. NR 465.46(1), Wis. Adm. Code, is the end of a compliance period consisting of that month and the preceding 11 months.

$$H_c = [D_c \times W_c]/V_s$$

Where,

H_c is the organic HAP content of the coating, kg (lb) of organic HAP emitted per liter (gallon) of coating solids used;

D_c is the density of coating, kg (lb) of coating per liter (gallon) of coating, determined according to s. NR 465.46(2)(c), Wis. Adm. Code;

W_c is the mass fraction of organic HAP in the coating, kg (lb) of organic HAP per kg (lb) of coating, determined according to s. NR 465.46(2)(a), Wis. Adm. Code;

V_s is the volume fraction of coating solids, liter (gallon) of coating solids per liter (gallon) of coating, determined according to s. NR 465.46(2)(b), Wis. Adm. Code.

(b) If you choose to comply with the emission limit in condition I.H.1.a.(1) by using the compliant material option, the use of any coating, thinner or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) above is a deviation from the emission limit in condition I.H.1.a.(1) that shall be reported as specified in s. NR 465.45(1)(c)6. and (2)(a)5, Wis. Adm. Code.

(c) As part of each semiannual compliance report required by s. NR 465.45(2), you shall identify the coating operations for which you used the compliant material option. If there were no deviations from the applicable emission limit in condition I.H.1.a.(1), submit a statement that the coating operations were in compliance with the emission limits during

H. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products
[Chapter NR 465, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]

the reporting period because you used no coatings for which the organic HAP co ntent exceeded the emission limit in condition I.H.1.a.(1), and you used no thinner, other additive or cleaning material that contained organic HAP, determined according to s. NR 465.46(2)(a), Wis. Adm. Code.

(d) You shall maintain records as specified in s. NR 465.45(3) and (4), Wis. Adm. Code.

[s. NR 465.46(3), Wis. Adm. Code, 40 CFR 63.3942, s. 285.65(13), Wis. Stats. (permit 14-RSG-142)]

ZZZ. Conditions Applicable to the Entire Facility.

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Synthetic Minor Limits and Facility Operating Hours Restriction	**(1)** No person may cause, allow or permit the combined individual monthly average emission of any federal hazardous air pollutant (federal HAP) emitted, as identified in Section 112(b) of the Clean Air Act [42 USC 7412(b)], to exceed 1,250 pounds per month, averaged over any 12 consecutive calendar months. **[s. 285.65(7), Wis. Stats . (permit 14 - RSG-142)]** **(2)** No person may cause, allow or permit the combined monthly average emission of all federal hazardous air pollutants (federal HAPs) emitted each month, as identified in Section 112(b) of the Clean Air Act (42 USC 7412(b)), to exceed 4,083 pounds per month, averaged over any 12 consecutive calendar months. **[s. 285.65(7), Wis. Stats . (permit 14 - RSG-142)]** **Note:** The above conditions (1) & (2) were elected so that the facility is an area source for federal HAPs and a SM source. **(3)** VOC emissions from the Processes P44 and P45 combined may not exceed 4,000 pounds per month, averaged over any 12 consecutive month period. **[s. 285.65(7), Wis. Stats. (permit 14 -RSG-**	**(1)(a)** The permittee shall use solvents containing methylene chloride only in process P44. **(b)** Methylene chloride content of the (methylene chloride containing) solvent solution used in P44 may not exceed 8.59 pounds per gallon. **(c)** Amount of methylene chloride containing solvent usage may not exceed 140 gallons per month averaged over any 12 consecutive month period. **[ss. 285.65(3),(7), Wis. Stats. (permit 14 - RSG-142)]** **(2)** The permittee shall determine and record the monthly total facility -wide HAP emissions (for each federal HAP), by the 15th of the following month. **[s. 285.65(3), Wis. Stats. (permit 14 - RSG-142)]** **(3)** For each month, the permittee shall determine and record the following by the 15th of the following month: **(a)** Monthly emissions of each federal HAP averaged over the last 12 consecutive month period (in pounds per month). **(b)** Monthly emissions of all federal HAPs	**(1)** The permittee shall collect and record the following information: **(a)** A unique name or id entification number for each HAP containing material used in processes P44, and P32C. **(b)** The HAP content of each federal HAP (e.g. methylene chlorid e, methanol, toluene, etc.) in each HAP containing material (in pounds per gallon), as applied. **(c)** MSDS or equivalent document for each HAP containing material which contains information to determine HAP content of the material (e.g. coating, solvent). **[s. 285.65(3), Wis. Stats., s. NR 439.04(1)(d), Wis. Adm. Code, s. NR 439.04(5)(d)1, Wis. Adm. Code]** **(2)** The permittee shall keep monthly records of: **(a)** the quantity of each HAP containing material used in gallons (for each process P44, P45, P71, P32C); **(b)** the quantity of methylene chloride containing solvents used in process P44 (in gallons per month), averaged over the last 12 consecutive month period. **(c)** amount of each federal HAP emitted (in pounds) for each process P44, P45, P71, P32C. **(d)** amount of natural gas combusted at the facility (in units of million cubic feet). **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code (permit 14-**

ZZZ. Conditions Applicable to the Entire Facility.

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	142)] Note: Permit 08-RSG-053 restricted VOC emissions (excluding VOC emi ssions from natural gas combustion) from Pennsylvania Avenue site to 4,000 pounds per month, averaged over any 12 consecutive month period (24 tons per year). This limit was to avoid non-attainment area major source review under the ozone 1 -hr standard, fo r the construction (1995 construction) of sources at the Pennsylvania Avenue Site. Maximum theoretical VOC emissions from combustion of natural gas for sources constructed at the Pennsylvania Avenue site in 1995 were less than 1 ton per year. Currently, only P44 and P45 remain from the sources constructed in 1995. All other 1995 constructed VOC emitting processes (except for natural gas combustion sources) at the Pennsylvania Avenue site have been removed. **(4)** The facility shall only operate within the pe riod 5:00 a.m. to 11:00 p.m. , each day.**[s. NR 404.08(2), Wis. Adm. Code, ss. 285.65(3), (7), Wis. Stats. (permit 14 - RSG-142)]** Note: The above facility operating hours restriction is included so that the facility-wide modeled $PM_{2.5}$ – 24 hr concentration (facility impact + background conc.) does not exceed the ambient air quality (24 -hr) standard of 35 $\mu g/m^3$ for $PM_{2.5}$.	combined averaged over the last 12 consecutive month period (in pounds per month). **[s. 285.65(3), Wis. Stats. (permit 14 - RSG-142)]** **(4)** For each month, the permittee shall determine and record the following by the 15th of the following month: **(a)** Emissions of VOCs from processes P44 and P45 combined. **(b)** Emissions of VOCs from processes P44 and P45 combined, averaged over the last 12 consecutive month period (in pounds per month). **[s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]**	**RSG-142)]** **(4)** The permittee shall keep the following records: **(a)** Purchase records of solvents containing methylene chloride which include purchase dates, received dates, quantity (in gallons) and methylene chloride concentration (in pounds per gallon). **(b)** The above records shall be kept for at least 5 years. **[s. NR 439.04(1)(d), Wis. Adm. Code]** **(5)(a)** The permittee shall maintain records of permitted process/production related operating hours on a daily basis to demonstrate compliance with the condition I.ZZZ.1.a.(4). **(b)** The permittee shall keep records required in conditions I.ZZZ1.b.(2), (3), and (4). **[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code (permit 14-RSG-142)]**

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
2. State Hazardous Air Pollutants (State HAPs).	**(1)** No owner or operator of a source may cause, allow or permit emissions of a hazardous air contaminant listed in Table A of s. NR 445.07, Wis. Adm. Code, in such quantity or concentration or for such duration as to cause an ambient air concentration of the contaminant off the source property that exceeds the concentration in column (g) of Table A for the contaminant. **[s. NR 445.07(1)(a), Wis. Adm. Code)]***	**(1)** The permittee shall prepare and maintain the following monthly records: **(a)** Amount of NaOH used in pounds. **(b)** Amount of HCl used in pounds. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)]*** **(2)** When the permittee elects to significantly change the existing operation (e.g., raw material or product change or production capacity increase), the permittee shall determine, either analytically or through the use of technical calculations, the facility's new or increased potential emissions of any state hazardous air pollutant (State HAP) emitted, assuming maximum operation conditions. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]*** **(3)** The permittee shall determine if the facility's new or increased potential emission rate of any State HAP exceeds the applicable published de minimus value in Table A of s. NR 445.07, Wis. Adm. Code. **[s. NR 407.09(4)(a)3.b., Wis. Adm.**	**(1)** Whenever any hazardous air pollutant concentration or emission rate testing of any material is required for demonstrating compliance, the permittee shall use a test method and testing protocol approved by either the US EPA or the Department. **[ss. NR 407.09(1)(c)1.a. & 4(a)1. and NR 439.06(8), Wis. Adm. Code]** **(2)(a)** The permittee shall keep the following records: **(i)** Purchase records of NaOH which include purchase dates, received dates, quantity and NaOH concentration (for liquid NaOH purchase); **(ii)** Purchase records of HCl which include purchase dates, received dates, quantity and HCl concentration. **(iii)** The above records shall be kept for at least 5 years. **[s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]**

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		Code]* **(4)** When the facility's new or increased potential emission rate of any State HAP exceeds a published de minimus value, the permittee shall evaluate the impact of the pollutant's emission and determine if any additional action needs to be taken to protect the ambient air quality standard. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]***	
3. Malfunction Prevention and Abatement Plan.	**(1)** A malfunction prevention and abatement plan shall be prepared and followed for the plant. **[s. NR 439.11, Wis. Adm. Code]** **(2)** All air pollution control equipment shall be operated and maintained in conformance with good engineering practices (i.e. operated and maintained according to manufacturer's specifications and directions) to minimize the possibility for the exceedance of any emission limitations. **[s. NR 439.11(4), Wis. Adm. Code]** **(3)** Upon request, the facility shall submit the plan to the Wisconsin Department of	**(1)** The malfunction prevention and abatement plan shall be developed to prevent, detect and correct malfunctions or equipment failures which may cause any applicable emissions limitation to be violated or which may cause air pollution. **[s. NR 439.11(1), Wis. Adm. Code]** **(2)** This malfunction prevention and abatement plan shall include installation, maintenance and routine calibration procedures for the process monitoring and control equipment instrumentation. This plan shall require an instrumentation calibration at the frequency specified by the manufacturer, yearly or at a frequency based on good engineering practice as established by operational history,	None Applicable.

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	Natural Resources, South Central Region Air Program, Reedsburg Area Office for review. The department may amend the plan if deemed necessary for malfunction prevention or for the reduction of excess emissions during malfunctions. **[s. NR 439.11(2), Wis. Adm. Code]**	whichever is more frequent. Inspection and calibration shall also be conducted whenever instrumentation anomalies are noted. **[ss. NR 407.09(1)(c)1.c., NR 439.055(4) and s. NR 439.11, Wis. Adm. Code]** **(3)** The malfunction prevention and abatement plan shall require a copy of the operation and maintenance manual for the control equipment to be maintained on site. The plan shall contain all of the elements in s. NR 439.11(1)(a) - (h), Wis. Adm. Code. **[s. NR 439.11, Wis. Adm. Code]**	
4. Stack Testing Requirements.	**(1)** Whenever stack testing is required, **(a)** If any required compliance emission test(s) cannot be conducted within the time frames specified in this permit, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). **[s. NR 439.07, Wis. Adm. Code]** **(b)** All testing shall be performed with the emissions unit operating at capacity or as close to capacity as practicable and in accordance with approved procedures. If	(1) Two copies of the report on any compliance emission tests shall be submitted to the Department for evaluation within 60 days following the completion of tests. **[s. NR 439.07(9), Wis. Adm. Code]**	None Applicable.

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	operation at capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. **[s. NR 439.07(1), Wis. Adm. Code]** **(c)** The Department shall be informed at least 20 working days prior to any stack testing, so a Department representative can witness the testing. At the time of notification, a compliance emission test plan shall also be submitted to the Department for approval. When approved in writing, an equivalent test method may be substituted for the reference test method. The notification and test plan shall be submitted to the Wisconsin Department of Natural Resources, South Central Region Air Program, Reedsburg Area Office. **[s. NR 439.07(2), Wis. Adm. Code]**		
5. Compliance Reports/Records.	**(1)** Except as provided under ZZZ.7.a.(4), upon issuance of the operation permit, the permittee shall submit periodic monitoring reports. **[s. NR 407.09(1)(c)3., Wis. Adm. Code]** **(2)** Except as provided under ZZZ.7.a.(4), upon issuance of the operation permit, the	**(1)** The permittee shall submit a monitoring report which contains the results of monitoring or a summary of monitoring results required by this permit to the Department every twelve (12) months. **(a)** The time period to be addressed by the	

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	permittee shall submit periodic certification of compliance. **[s. NR 407.09(4)(a)3., Wis. Adm. Code]** **(3)** The records required under this permit shall be retained for at least five (5) years and shall be made available to department personnel upon request during normal business hours. **[s. NR 439.04, s. NR 439.05, Wis. Adm. Code]**	submittal January 1 to December 31. **(b)** The report shall be submitted to the Wisconsin Department of Natural Resources, Southeast Region Headquarters within 45 days after the end of each reporting period. **(c)** All deviations from and violations of applicable requirements shall be clearly identified in the submittal. **(d)** Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report. **(e)** The content of the submittal is described in item D. of Part II of the operation permit. **[ss. NR 407.09(1)(c)3. & NR 439.03(1)(b), Wis. Adm. Code]** **(2)** The permittee shall submit an annual certification of compliance with the requirements of this permit to the Wisconsin Department of Natural Resources, Southeast Region Headquarters. **(a)** The time period to be addressed by the report is January 1 to December 31 of the preceding year.	

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		(b) The report shall be submitted to the Wisconsin Department of Natural Resources within 45 days after the end of each reporting period. **(c)** The information included in the report shall comply with the requirements of Part II, Section N of this permit. **(d)** Each report shall be certified by a responsible official as to the truth, accuracy and completeness of the report. **[ss. NR 407.09(4)(a)3. & NR 439.03(1)(c), Wis. Adm. Code]**	
6. Supersession	**(1)** Permit 14-RSG-142 supersedes following permit conditions in permit 08-RSG-053: **(a)** Permit conditions in 08-RSG-053 pertaining to processes located at Pennsylvania site. **(b)** Permit conditions in 08-RSG-053 for processes P32B, P32C, and P50C. **(c)** Permit conditions in 08-RSG-053 for stacks S12B, S12C, and S53. **[s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]**	None Applicable.	None Applicable.

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
7. Construction Permit 14-RSG-142 Transitional Language	**(1) Notifications.** The permittee shall inform the Department of the following dates: **(a)** The date construction commences on any new emission sources addressed in Permit 14-RSG-142. Any emission units (e.g., P32B, P32C, P50C) relocated from Norwich Avenue to the facility in Pennsylvania Avenue are considered new emission units (sources). **(b)** The date new emission units become operational. For pu rposes of this permit, "operational" shall be defined as the first time of any process related air contaminant is emitted into the ambient air. **[s. NR 439.03(1), Wis. Adm. Code (Permit 14-RSG-142)]** **(2) Construction Authorization Expiration.** The Authorization to Construct, under Construction Permit 14-RSG-142 expires 18 months after the date of issuance. Construction or modification and an initial operation period for equipment shakedown, testing and Department evaluation of operation to assure conformity with the permit	**(1) Notifications**. The permittee shall submit to the Department of Natural Resources, South Central Region Air Program, Reedsburg Area Office in writing, within 15 days of the date the event [except for item (a) below]*, the following: **(a)** The date construction commences on the any new or modified emission units addressed in Permit 14-RSG-142. **(b)** The date new emission units become operational. **[s. NR 439.04(1)(d), Wis. Adm. Code (Permit 14-RSG-142)]** * Permittee obtained a construction waiver to construct before obtaining a construction permit. **(2) Malfunction Prevention and Abatement Plan.** The owner or operator shall update the facility's Malfunction Prevention and Abatement Plan to include wet scrubbers C10 and C70 within 60 days of the date each scrubber becomes operational. **[s. NR 439.11(1), Wis. Adm. Code (Permit 14-RSG-142)]**	None Applicable.

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	conditions is authorized for each emissions unit covered in this permit. Please note that the sources covered by this permit are required to meet all emission limits and conditions contained in the permit at all times, including during the initial operation period. If 18 months is an insufficient time period for construction or modification, equipment shakedown, testing and Department evaluation of operation, the permit holder may request and the Department may approve in writing an extension of this permit. The conditions of the construction permit are permanent, unless revised, superseded or revoked. **[ss. 285.60(1)(a)2. and 285.66(1), Wis. Stats., and s. NR 406.12, Wis. Adm. Code (permit 14-RSG-142)]** **(3) Malfunction Prevention and Abatement Plan.** The permittee shall prepare/update the facility's Malfunction Prevention and Abatement Plan to include the operation and maintenance of the control equipment C10, C70. **[s. NR 439.11, Wis. Adm. Code (p ermit 14-RSG-142)]** **(4) Compliance Reports/Records.** The permittee shall submit periodic monitoring	**(3) Submittal of updates.** The permittee shall submit to the department any updates of the permit application. Updates are required if any changes that occur which are not specified or described in the plans and specifications dated August 11, 2014, August 14, 2014. The updates shall be made within 60 days of the date of the change. Other information to be submitted shall include the notification requirements. The continued operation of the new emission units addressed in this construction permit are prohibited once the authorization to construct expires per Condition ZZZ.7.a.(2), unless any required updates have been submitted and the permittee has satisfied the notification requirements of Condition ZZZ.7.b.(1). **[s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]** **(4) Submittal of Malfunction Prevention and Abatement Plan.** The permittee shall update the facility's Malfunction Prevention and Abatement Plan to include the operation and maintenance of the wet scrubbers C10 and C70. **[s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]**	

Condition Type	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	reports and certification of compliance as required by s. ZZZ.5.a.(1) and (2) for any modified and new emission unit for the period when that unit becomes operational. Note that compliance monitoring and reporting requirements and limitations of any unmodified units remain in effect. **(5) Completion of Operation Permit Application.** The permittee shall update the permit application if any changes occur which are not specified or described in the plans and specifications approved under construction permit 14-RSG-142. **[s. NR 407.04(1)(b), Wis. Adm. Code (Permit 14-RSG-142)]**	**(5)** All submittals described in this permit shall be made in writing and include the name of the facility, the facility's address, the construction permit number and a description of the affected emission unit(s). **[s. NR 439.04(1)(d), Wis. Adm. Code (permit 14-RSG-142)]**	