State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Oshkosh Service Center
625 E. County Road Y, Suite 700
Oshkosh WI 54901-9731

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
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July 19, 2017

Peggi Hall, Registered Agent
Container Life Cycle Management, LLC
6930 S 6th Street
Oak Creek, Wisconsin 53154

C T Corporation, Registered Agent
Greif, Inc
301 S. Bedford Street, Suite 1
Madison, Wisconsin 53703

Certified Mail / Return Receipt
Casetrack # 2017-SEEE-016
FID 241021220
FID 341158070
Milwaukee County

Subject: NOTICE OF VIOLATION / ENFORCEMENT CONFERENCE – August 9, 2017

Dear Ms. Hall and CT Corporation:

The Department of Natural Resources (department) has reason to believe Container Life Cycle Management, LLC (CLCM) and Greif, Inc. (Greif) are in violation of Wisconsin's air management laws. The violations are based on site visits, inspections conducted by the department from 2015 through present, and responses received to requests for information.

Two industrial locations are subject to this Notice of Violation:

- 8570 S Chicago Road, Oak Creek, Milwaukee County, Wisconsin (Chicago Rd Site) – At the Chicago Rd Site, CLCM operates a drum reconditioning facility. Air emissions from operations are permitted under the authority of an Air Pollution Control Operation Permit No 241021220-P20, effective June 11, 2013, issued to Mid-America Steel Drum Company. On May 12, 2017, Foley and Lardner, LLP (Foley) responded on behalf of CLCM providing an operation permit revision request stating that CLCM is the current operator. CLCM is an indirect joint venture subsidiary of Greif, of which Greif is the principal and majority owner.

- 3950 S Pennsylvania Avenue, St. Francis, Milwaukee County, Wisconsin (Pennsylvania Ave Site) – At the Pennsylvania Ave Site, CLCM processes / washes drums. Air emissions from operations are permitted under the authority of an Air Pollution Control Construction Permit No 14-RSG-142, effective March 9, 2015, issued to CLCM. CLCM is an indirect joint venture subsidiary of Greif, of which Greif is the principal and majority owner.

The department alleges the following violations:

Chicago Rd Site:

<u>INCOMPLETE DAILY SPRAY BOOTH INSPECTION LOGS (CLCM / Greif)</u>

1. **Section I. C.2.c.(3) of the Operation Permit 241021220-P20 states the permittee shall maintain a log of the daily inspections performed for each booth. Each inspection shall record the following information:**

(a) The date and time of the inspection
(b) The operational status of spray booth
(c) The placement and condition of the filter
(d) The signature or initials of the person performing the inspection

[Authority: Section NR 407.09(1)(c)1., Wis. Adm. Code, s. NR 439.04(1)(a) & (d), Wis. Adm. Code, and s. NR 439.055(2)(b), Wis. Adm. Code]

The department reviewed daily inspection logs for the Chicago Rd Site, performed for each spray booth. Numerous daily records from 2016 were missing the following required information:

(a) The time of the inspection

(c) The placement and condition of the filter

(d) The signature or initials of the person performing the inspection

EXCEED COATING LINE PM LIMITS (CLCM / Greif)

2. **Section I. C.2.a.(2) of Operation Permit 241021220-P20 states that particulate matter (PM) emissions may not exceed the following emission rate in units of pounds per hour:**

i) S13A (Interior Coating Lid - IC) - .003 PM lb/hr
ii) S13B (Interior Coating Drum - IC) - .008 PM lb/hr
iv) S14A (Exterior Coating Lid - EC) - .003 PM lb/hr
v) S14B (Exterior Coating Drum - EC) - .008 PM lb/hr

[Authority: Section NR 415.05(1)(o), Wis. Adm. Code, and s. NR 404.08(2), Wis. Adm. Code]

At the time of the inspection, the Chicago Rd Site was using interior coating (IC) and exterior coating (EC) filters manufactured by Chemco Products (Aqua 1) with an efficiency rating of 98.38%. In a response to additional information, Foley responded on behalf of CLCM writing that the Chicago Rd Site currently uses IC and EC filters manufactured by Chemco Products (Duo 2020) with an efficiency rating of 98.7%. The department calculated theoretical PM emissions from the spray coating line as outlined below:

Process Stack	OP Permit PM Emission Limit	Theoretical PM Emission Rate w/ 98.38% average control efficiency	Theoretical PM Emission Rate w/ 98.7% average control efficiency
S13A	0.003 lb/hr	0.13 lb/hr	0.10 lb/hr
S13B	0.008 lb/hr		
S14A	0.003 lb/hr	0.12 lb/hr	0.098 lb/hr
S14B	0.008 lb/hr		

The calculated theoretical PM emission shows CLCM / Greif cannot meet PM limits with either filter.

FAIL TO OBTAIN A CONSTRUCTION PERMIT (CLCM / Greif)

3. **Section 285.60(1)(a)1., Wis. Stats., states except as provided in sub. (2g), (3), (5m), or (6), no person may commence construction, reconstruction, replacement, or modification of a stationary source unless the person has a construction permit from the department.**

   Section NR 406.03(1), Wis. Adm. Code, states except as provided in sub. (2), no person may commence construction, reconstruction, replacement, relocation or modification of a stationary source unless the person has a construction permit for the source or unless the source is exempt from the requirement to obtain a permit under s. 285.60(5), Stats., or under this chapter.

On March 2, 2017, the department conducted a site visit of the Chicago Rd Site. The shot blast units were in operation, emissions from the shot blast units were routed to a baghouse, and a vent to ambient air was noted on the discharge of the baghouse. Controlled emissions were venting to the ambient air. This ambient air venting is not identified within the OP Permit. The department requested the situation be remedied. In an email dated March 28, 2017, Mr. Meyer, representative for CLCM, wrote he was able to seal off the vent in the ductwork.

Based on data provided by Foley on behalf of CLCM, the maximum theoretical emissions for particulate matter is 145 lb/hr. The shot blast unit is not an exempt process under s. NR 406.04(2), Wis. Adm. Code. CLCM / Greif were required to obtain a construction permit for this unit.

Pennsylvania Ave Site:

CONTROL EFFICIENCY FOR FILTERS USED IN P32C (CLCM / Greif)

4. **Section I.G.1.b.(2) of Construction Permit 14-RSG-142 states the dry filters used in process P32C shall have a particulate matter control efficiency of at least 99%.**

   [Authority: Section 285.65(7), Wis. Stats.]

Based on information provided by Amy Litscher after the March 27, 2017 FCE, the Pennsylvania Ave Site was using the 3200 Series Spra-Gard high efficiency dry filters in process P32C with an average particulate matter control efficiency of 97.0 to 98.0%. Filters in process P32C are required to have a control efficiency of at least 99%.

INCOMPLETE SCRUBBER RECORDS (CLCM / Greif)

5. **Section I.B.1.c.(3(a) of Construction Permit 14-RSG-142 states the permittee shall keep records of the date, time, and initials of the person performing the required periodic inspections.**

   [Authority: Section NR 407.09(4)(a), Wis. Adm. Code, s. NR 439.04(1)(d), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]

The department reviewed Pennsylvania Ave site scrubber maintenance records from January 2016 to February 2017. Some of the maintenance records fail to include the initials of the person performing the inspection and the time of inspection, as required.

MISREPRESENTATION OF INFORMATION IN PERMIT APPLICATION (CLCM / Greif)

6. **Section NR 406.11(1)(b), Wis. Adm. Code, states that any misrepresentation or deliberate failure to disclose fully all relevant, significant facts when obtaining a permit may result in the revision, suspension, revocation, or withdrawal of a source's construction permit.**

Based on information obtained as part of follow-up inspections at the Pennsylvania Ave Site, the department believes that CLCM/Grief misrepresented the emissions coming from the source in their August 8, 2014 application. Despite requests for further information since issuance of the permit, CLCM / Greif have not fully accounted for all potentially significant emission sources in the 14-RSG-142 Construction Permit. This includes emissions from the following processes:

(a) P41, Stack S96 – Drying Oven/Flamer – In addition to the combustion of natural gas in the oven that was disclosed as part of the August 8, 2014 application, the department has asked that the process related particulate matter emissions also be quantified. At the time of the March 27, 2017 inspection, visible emissions from the drying oven/flamer were witnessed at 15-20 % opacity.

(b) Process emissions venting to Stack S98 – PM, VOC, and HAP emissions from drum content residuals need quantification. The August 8, 2014 application did not account for any emissions from drum residuals and listed these operations as "Insignificant sources".

ODOR COMPLAINTS (CLCM / Greif)

7. **Sections NR 429.03(1) and (2)(a), Wis. Adm. Code, states no person may cause, allow, or permit emission into the ambient air of any substance or combination of substances in such quantities that an objectionable odor is determined to result unless preventive measure satisfactory to the department are taken to abate or control such emission. The department shall determines after an investigation whether the nature, intensity, frequency, and duration of the odor— in addition to any other pertinent factors— make the odor objectionable.**

The department conducted surveillance of the Pennsylvania Ave Site in October 2015. As a result of the surveillance, the department issued a Letter of Noncompliance (LON) on November 2, 2015. The LON requested CLCM to provide additional information rated to its operations that could have caused the malodourous odors and the submittal of odor mitigation plan. CLCM provided an Odor Prevention and Abatement Plan to the department on November 13, 2015. Odor complaints continued, with the last received on February 27, 2017. From April 2016 through February 2017, odors were detected by the department's compliance engineer at levels ranging from 2 to 7. The department believes there are objectionable odors at the Pennsylvania Ave Site. Additional preventative measures are required to be taken to abate or control such odors.

Chicago Rd and Pennsylvania Ave Sites:

FAIL TO RESPOND TO INFORMATION REQUESTS (CLCM / Greif)

8. **Section NR 439.03(1)(a), Wis. Adm. Code, states when requested by the department, a person shall furnish to the department information to locate and classify air contaminant sources according to the**

   type, level, duration, frequency and other characteristics of emissions and such other information as may be necessary. The information shall be sufficient to evaluate the source's effect on air quality and compliance with chs. NR 400 to 499.

At the Chicago Rd Site, the department has requested the following information:

(a) Quantify HAP emissions from the processing / burning of material

At the Pennsylvania Ave Site, the department has requested the following information:

(b) Demonstrate the "Flo-Strip" has a VOC content less than or equal to 1.52 lb/gal

(c) Drawings, blueprints, or other equivalent documents showing the actual physical stack parameters

(d) Classification of 14 coatings as either general or extreme coatings

(e) Process emissions venting to Stack S98 – PM, VOC, and HAP emissions from drum content residuals need quantification.

(f) P41, Stack S96 – Drying Oven/Flamer – In addition to the combustion of natural gas in the oven that was disclosed as part of the August 8, 2014 application, the department has asked that process related particulate matter emissions also be quantified

To date, CLCM / Grief have been unresponsive in providing the information requested above for the Chicago Rd and Pennsylvania Ave Sites. Failure to provide this information has prevented the department from being able to appropriately evaluate the source's effect on air quality and determine compliance with chs. NR 400 to 499, Wis. Adm. Code.

We have scheduled the following Enforcement Conference to discuss this matter in more detail:

Conference Date:	Wednesday August 2, 2017
Conference Time:	1:30 p.m.
Location:	DNR Milwaukee Service Center 2300 N Dr Martin Luther King Jr Drive Milwaukee, WI

We request you attend the Enforcement Conference as it is an important opportunity to discuss the circumstances surrounding the alleged violations and to learn your perspective on this matter. Please note that in an effort to encourage a candid and productive conversation, attendance is limited to you, your legal counsel, and others with the technical expertise necessary to understand, evaluate and correct the violations.

The department's enforcement decision will be based upon available information if you do not attend the Enforcement Conference.

Violations of Operation Permit 241021220-P20, Construction Permit 14-RSG-142, ch. 285, Wis. Stats., and chs. NR 400 - 499, Wis. Adm. Code are enforceable under s. 285.87, Wis. Stats. and may be referred to the Department of Justice to obtain court ordered compliance and penalties of up to $25,000.00 for each violation.

If you have questions, please contact me at (920) 360-1938.

Sincerely,

Anne Van Grinsven

Anne Van Grinsven
Environmental Enforcement Specialist

Enclosures: Enforcement Conference Information Sheet
June 7, 2017 DNR Letter Containing the following:
- March 27, 2017 Full Air Compliance Evaluation – Norwich Ave Site
- March 27, 2017 Full Air Compliance Evaluation – Pennsylvania Ave Site
- March 28, 2017 Full Air Compliance Evaluation – Chicago Rd Site

June 19, 2017 DNR Addendum to FCE Report of March 27, 2017 - Pennsylvania Ave Site

cc: Mike Griffin - Milwaukee
Scott Swosinski – CLCM, LLC; 8570 S Chicago Road, Oak Creek, WI 53154
Mark Furgason – CLCM, LLC; 3950 S Pennsylvania Avenue, St. Francis, WI 53235
Ole Rosgaard, VP – Greif, Inc; 366 Greif Parkway, Delaware, Ohio 43015
Linda Benfield – Foley & Lardner, LLP; 777 East Wisconsin Ave, Milwaukee, WI 53202
Sarah Breneman – Chief, Air Enforcement and Compliance Assurance Branch; EPA Region 5

WISCONSIN DEPT. OF NATURAL RESOURCES

Environmental Enforcement Conference

An Enforcement Conference (EC) is a meeting between Department of Natural Resources (Department) staff and representatives of a person or business that the Department believes has violated an environmental law. The Department issues a Notice of Violation (NOV) when it has reason to believe that a violation of a permit condition, administrative rule or statutory requirement has occurred. The NOV either offers or schedules an EC.

Why Should I Attend?
The EC is an important opportunity to discuss the Department's basis for the alleged violation(s) and learn more about what happened, why it may have happened, and any factors you believe the Department should consider, such as steps that have been or will be taken to stop the violation, correct any effects of the violation, and prevent violations from occurring in the future. It is also your opportunity to explain why you might disagree with the factual and legal conclusions underlying the NOV.

Historic data shows that most violations are resolved at the EC level, without the need for court ordered compliance and/or penalties. In situations where the significance of the violation warrants further enforcement action, your cooperative efforts to resolve the violation and prevent future violations will help minimize your legal and financial liability.

Who Should Attend the EC?
Department staff involved in the EC typically consists of an Environmental Enforcement Specialist and regulatory staff that are familiar with the issues identified in the NOV.

While not required, you may seek representation by legal counsel or the assistance of an environmental consultant to prepare for and/or attend the EC. The EC is most productive when all involved are well-prepared to discuss the allegations and any corrective actions that may be necessary.

To ensure a productive candid discussion, participation in the EC is limited to the person or business involved and others with the legal or technical expertise necessary to understand, evaluate, mitigate and correct the violation. The EC is not an open meeting under state law and the Department will limit participation to those directly involved in the resolution of the matter.

What Happens if I don't Attend the EC?
If a party is unable to attend the EC, they should immediately contact the Environmental Enforcement Specialist at the phone number in the NOV to reschedule. When a party refuses to attend the EC and provides no further information to the Department, the Department's enforcement decision will be based upon available information.

What Happens Following the EC?
The EC is part of the Department's stepped enforcement process. At the EC, Department staff will explain the process and options available to address the alleged violation. Generally, the options range from closing the matter with no further action to referral to the Wisconsin Department of Justice (DOJ) or to U.S. EPA, for further enforcement action. In limited circumstances, the Department can issue citations, which are handled in local court similar to traffic offenses. If a case is referred to DOJ, the DOJ may initiate an action in court on behalf of the State. The State typically asks the Court to impose financial penalties and order completion of any necessary corrective actions. In most of the Department's cases, a cooperative return to compliance with any necessary restoration results in close out of the case. At close out, the Department will send a letter advising of no further enforcement action.

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WISCONSIN
DEPT. OF NATURAL RESOURCES

June 7, 2017

Mr. Kevin Meyer
Mid-America Steel Drum Company
8570 S Chicago Street
Oak Creek, WI 53154-3518

FID 241021220

Dear Mr. Meyer,

Please find enclosed are copies of three full air compliance evaluations for the following facilities:

241021220 Mid-America Steel Drum Company – Oak Creek, WI
341158070 Mid-America Steel Drum Company – CLCM - St. Francis
241063570 Mid-America Steel Drum Company Inc./ Kitzinger

These reports are being provided for your information and distribution. If there is anything in these reports that you find to be incorrect, or have omitted, please feel free to contact me/us in writing.

In closing, thank you and your associates for your assistance, understanding, and follow-up information.

Respectfully,

Michael Griffin P.E.
Air Management Engineer
Southeast Region – Milwaukee Service Center

C: BAM AM/7
Case File

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
SOUTHEAST REGION
FULL AIR COMPLIANCE EVALUATION (FCE) SUMMARY

FID: 341158070	FCE/SITE VISIT DATE: March 27, 2017 ☒ EPA Committed FCE ☐ Uncommitted FCE Announced Inspection ☒ Yes ☐ No
FACILITY NAME AND LOCATION: GLCM Mid-America Steel Drum 3950 S. Pennsylvania Ave. St. Francis, WI. 53235	**EPA CLASS TYPE:** Inconclusive The facility is identified under the current construction permit as a SM-80 source
COUNTY: MILWAUKEE	**SIC AND NAICS CODES AND DESCRIPTIONS:** SIC: 3324 – Metal working NAICS: 332443 – Metal can, box, and other metal container manufacturing
INSPECTION PARTICIPANTS: Mark Furgason – Mid-America Steel Drum Co./Kitzinger Amy J. Ellscher – President, Saga Environmental & Engineering, Inc. Mike Griffin – WDNR Dan Heilenberg - WDNR	**APPLICABLE AIR PROGRAMS:**

Prog./Pmt. Code:			
NR 445	☒	P63 NESHAP MACT	☐
PSD	☐	P63 NESHAP GACT	☐
NAA	☐	P64 CAM	☐
P60 NSPS	☐	P75 CEM	☐
P61 NESHAP	☐	P76 ACID RAIN	☐
P62 NESHAP MACT	☐		

Credentials Shown: ☒ Yes ☐ No

TOTAL REPORTED ACTUAL FACILITY EMISSIONS IN TONS/YEAR*:

	PM	SO_2	NO_x	VOC	CO	PM10	HAP
2016 (Uncertified)	-	-	-	23.4	-	-	2
2015	0.2	-	1.0	15.7	0.9	0.1	-
2014	-	-	-	-	-	-	-
Class Code	B	B	B	A	B	B	10/25
Attainment Status	Attn.	Attn.	Attn.	Attn.	Attn.	Attn.	Attn.
PSD Major	no	no	no	no	no	no	no

*Emission data above is from the emission inventory.

IS FACILITY IN COMPLIANCE WITH ALL WISCONSIN AIR REGULATIONS?

☐ Yes ☒ No ☒ Additional Information Is Needed Before This Determination Can Be Made.

Are permit revisions needed? ☒ Yes ☐ No (If yes – see the areas with grey highlighting)

INSPECTOR SIGNATURE: Michael Griffin SIGNATURE DATE: 5/31/2017
TITLE: Air Management Engineer

SUPERVISOR SIGNATURE: Kendra Fisher SIGNATURE DATE: 6/1/2017
TITLE: Supervisor

Cc: Bureau of Air Management - Compliance, AM/7

Facility

FACILITY INFORMATION

FACILITY CONTACT:	FACILITY CONTACT PHONE/EMAIL:
Mike Higgins – General Manager, Mid-America Steel Drum Co./Kitzinger	(414) 762-1114 // mhiggins@masdinc.com
Mark Furgason – Facility Manager, Mid-America Steel Drum Co./Kitzinger	(414) 483-8801// mfurgason@masdinc.com

FACILITY AIR PROGRAMS:

Air Program	Subpart	Citation

FACILITY DESCRIPTION:

The CLCM facility is located in the City of St. Francis, Milwaukee County on Pennsylvania Ave. This facility cleans used/soiled closed top 55 gallon drums. Both steel and plastic 55 gallon drums are cleaned at this location using an aqueous fluid. Once cleaned, the exterior of the steel drums are shot blasted and then repainted, tested and ready for sale. Plastic drums are washed, rinsed, labels removed, inspected and ready for sale. The facility is still operating under a construction permit issued March 19, 2015, as modifications to the plastic barrel line are still under construction. The surrounding area is light commercial to the east and residential to the north, south, and west. Milwaukee County is designated as attainment for all criteria air pollutants.

POINT/PROCESS DESCRIPTION:

55 GALLON STEEL DRUM Refurbishing Operation

2-Wide Pre-Flush Plastic/Metal (West Side) (Process P80A)
This process is the first step in drum cleaning for drums that contain products other than oil. 55 gallon closed top drums are conveyed into the processing area, the two seals (bungs) are removed and sent to the rotary tumble washer. The drums are then tipped upside down and placed over a flushing nozzle. The drum contents are allowed to drain into the sump. Shortly thereafter, a charge of heated caustic solution is flushed into the drum. The sump solution is plumbed to the pre-flush heating tank #1 (P15). The solution is maintained at 190 Deg F. There are two fume hoods over this pre-flush station that vent the fumes to the wet scrubber (C10).

2-Wide Pre-Flush Plastic/Metal (East Side) (Process P80B)
This process is the first step in drum cleaning for drums that contain petroleum distillates and/or oil. 55 gallon closed top drums are conveyed into the processing area and the two seals (bungs) are removed and sent to the rotary tumble washer. The drums are then tipped upside down are placed over a flushing nozzle. The drum contents (oil) are allowed to drain into the sump. Shortly thereafter a charge of heated caustic solution in flushed into the drum. The sump solution is plumbed to the pre-flush heating tank #3 (P13). The solution is maintained at 185 Deg F. There are two fume hoods over this pre-flush station that vent the fumes to the wet scrubber (C10).

Rotary Tumble Washer
The barrel bungs are placed in a rotary tumble washer for cleaning. The pre-wash caustic solution is used as the cleaning fluid. After cleaning, the bungs are rinsed and made ready for re-use. Solvent emissions were present at this industrial cleaning process. The rotary tumble washer has a vent that routes emissions to wet scrubber C10.

Exterior Drum Washing Tunnel (Process P72)
Only metal drums from the pre-flush area are conveyed to the exterior washing tunnel where a high pressure heated caustic solution power washes each drum exterior. There are two vents on this tunnel that collect fumes and routes them to the wet scrubber (C10). The rinse solution goes to outside wash heat tank #2 (P14). The solution is heated to 185 Deg F.

Pressurized Dent Remover (Process P73)
This process pressurizes metal drums to restore the exterior shape of the drum and pop out dents.

Two Wide Interior Wash (Process P74)
This process uses a hot caustic flush followed by a hot water rinse to clean the steel drum interior. The 55 gallon closed top drums are conveyed upside down and are automatically placed over a flushing nozzle. The drum interior is flushed twice with a charge of heated caustic solution followed by two flushes of water. The caustic sump solution is plumbed to the heating tank #2 (P14). The rinse solution is plumbed to heat tank #4 (P12), which is pH adjusted to 7-8. The temperature is maintained at 185 Deg F. There are two fume hoods over this interior rinse station that vent the fumes to the wet scrubber (C10).

Interior Inspection
The steel drums are inspected at this stage. A light is dropped inside the drum and the interior condition is noted. If there is a light rust or scale noted, these drums go to a second interior cleaning operation. Drums that pass this inspection are routed to the exterior shot blasting operation.

Interior Acid Rinse (Process P75)
The facility is permitted (14-R8G-142) to install three acid rinsing stations for the drum interior etching operations. Currently only two stations are constructed and in operation. The drums are manually placed in an enclosed containment area where the drum is internally flushed with hydrochloric/muriatic acid. The acid is recovered and the fumes are routed to a small wet scrubber (C11). The drums are then rinsed with the hot caustic/solvent solution from the pre-flush heated tank solution tank #1 (P15). The drums are allowed to off-gas and cool in this area prior to being placed on the conveyor leading to the Two Wide Interior Wash process (process P74).

Steel Shot Blast (Process P76A)
The cleaned drums are conveyed to an automated steel shot blast operation where the paint is blasted from each of the surfaces. Emissions from the shot blast unit are controlled by a baghouse. The baghouse emissions vent interior to the building.

Hand Grinding (2 stations) (Process P76B and P76C)
After shot blasting, there are two stations where hand held grinders are used to remove any imperfections, i.e. labels, burrs, etc. The stations look similar to spray paint booths with one wall being covered with expanded paper filters and the resulting filtered air being discharged within the building. The completed drums are then conveyed to the spray painting booth.

Exterior Spray Painting (Automated) (Process P32C, P32D, P32E)
Drums are conveyed to a spray painting booth. There are 4 guns on the first stage, 4 guns on the second stage, and 2 guns for the third stage. This booth also has a manual spray wand to touch-up areas where needed. The paint is supplied by means of a rack of 55 gallon drums, each fitted with a pump that provides the paint to each paint gun. At the time of this inspection, the drums were being painted Chevron Blue manufactured by Watson Standard. Emissions are controlled by disposable filters which are replaced daily. The filters are distributed by Research Products Corp, filter series PA3200. The 3200 Series Spra-Gard filters are made of slit and expanded kraft paper and one layer of "light" polyester. The efficiency is 98.5 to 99.5% on high solids bake enamels. There is no efficiency rating for water based air dried coatings.

Paint Drying Tunnel (Process P32B)
The painted drums are conveyed to a paint baking tunnel/oven. The tunnel has two lanes and is maintained at 350-400 Deg F. At the end of the tunnel is a dry air cooling area where the drums cool down. The Drums are then inspected for container integrity to meet DOT requirements. Drums that pass this requirement are routed to the shipping dock for shipping as a final product.

55 GALLON PLASTIC DRUM Refurbishing Operation

NOTE: The descriptions provided below represent operations as witnessed during this inspection. Some of these processes will be combined with the newer steel drum processing operations once construction is complete.

Plastic Drum Receipt
Plastic used drums arrive by tractor trailer. The drums are removed from the trailer and placed on a conveyor line leading to the pre-flush area.

Plastic Drum De-Labeling/Label Stripping (Process P44)
While the drums travel down the conveyor, the exterior of the drums are inspected for labels. At process P44, labels are manually removed from the exterior of plastic drums using a brush-on shipping compound which contains methylene chloride. Two semi-paste solvents are used. Zep Big Orange solvent has a VOC content of 6.59 lbs/gallon, as applied, and Chemispehere SP 1700 has a VOC content of 1.52 lbs/gallon as applied. Chemisphere SP1700 contains methylene chloride. Emissions from this process are indoor fugitive emissions.

Plastic Drum Pre-Flush (Process P95)
The drums are pulled from the conveyor and are staged onto a flushing nozzle where the contents drop out and the drum interior is initially flushed with a caustic solution. The solution is heated and the contents return to the heat tank A. Emissions from heat tank A are indoor fugitive. Emissions from natural gas combustion are vented out by means of stack S102.

Plastic Drum Exterior Wash
The plastic drums pass through an exterior washing tunnel where the exterior is washed with a heated caustic solution. The caustic solution is returned to the heat tank B. Emissions from heat tank B are indoor fugitive. Emissions from natural gas combustion are vented out by means of stack S244.

Plastic Drum Wipe Cleaning (Process P45)
The plastic drum exterior is wipe cleaned using acetone. Emissions from this process are indoor fugitive emissions.

Plastic Drum Interior Inspection (Process P41)
An operator places a light inside the drum to inspect the interior. If a strong odor is present, this drum is defective and is sent to the plastic drum shredder. If the drum interior is acceptable, the drum is moved on to the flamer operation.

Flamer Process
A plastic drum is placed in an enclosure. The exterior surface comes in direct contact with a natural gas flame. This causes any burrs to become singed and creates a glossy glaze appearance on the drum. Emissions are uncontrolled and stack vented outside.

Inspection
The Drums are then inspected for container integrity to meet DOT requirements. Drums that pass this requirement are routed to the shipping dock for shipping as a final product.

MISCELLANEOUS

USED OIL PROCESSING
The facility has two tanks were the used/recovered waste oils are collected and processed. The oil is treated in treatment tank T33. Emissions from this tank vent to the wet scrubber C10. The second tank is where the used oil is stored, tank T32. Emissions from this tank are also vented to the wet scrubber C10.

Water Treatment System
The water treatment system consists of a three stage tanks followed by a diatomaceous earth filter press. The permit identifies emissions from this process as being controlled by the wet scrubber C10. During this inspection, this venting was not present and a very strong solvent odor was present in this area. The emissions noted from each tank and the processed filter solid are being vented as an indoor fugitive emission.

Plastic Barrel Shredding
Plastic 55 gallon drums that are sent for shredding are processed indoors in the southeast corner of the plant. Emissions are vented as an indoor fugitive.

Additional processes were observed at the time of this inspection but were not included in the current report. The Department needs to obtain additional information prior to making a determination on the emissions from these processes.

PERMIT(S) ISSUED:

Permit No.	Issue Date	Purpose of Permit	Expiration Date
14-RSG-142	March 9, 2015	Construction Permit	March 9, 2018
14-RSG-142	December 11, 2014	Construction Permit Waiver to Obtain a Construction Permit Prior to Commencing Construction, 14-RSG-142	March 9, 2015
341158070-P01	Pending	Synthetic Minor – Non-Part 70 Operation Permit Application received on November 13, 2015	

COMPLIANCE SUMMARY
Construction Permit 14-RSG-142

Process P44 Stack(s) Label Stripping				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
.. Volatile Organic Compounds	(1) Latest Available Control Technology (LACT) applies to this process. 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 solvents used in P44 may not exceed 190 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 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 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.	(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 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 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)]	Inconclusive/Further Information Needed - The facility shared SDS data for the stripping solution. The original solution showed compliance. The manufacturer changed in 2015 and the new SDS for Flo-Strip® data is insufficient to verify compliance. On 03/27/2017, the Department verbally asked the facility to obtain a technical datasheet showing the compliance data for this product or have it tested for constituent content. As of the date of this inspection, this information has not been provided to the Department. The label stripping operation is used sparingly. Application of solvent to a rag is done by using a plunger type dispenser. For label removal, the solvent is applied using a paint brush. This operation was not in operation during this inspection. No open containers were noted in the production area.

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A. Process P47, Stack S99 – Label Stripping

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	285.65(3), Wis. Stats. (permit 14-RSG-142)] (3) See condition LZZZ.1.a.(1)			
2. Hazardous Air Pollutants	(1) See section LZZZ.1. for federal HAP emission restrictions for the facility to be a synthetic minor (area) source for federal HAPs.			Refer to LZZZ.1.

B. – Process P80A, Control C10, Stack S98 – Interior Caustic Prefrush (steel drums/plastic drums/containers)
Process P80B, Control C10, Stack S98 – Exterior Wash/Soaker (plastic drums/containers)
Process P80C, Control C10, Stack S98 – Interior 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)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. State HAPs Sodium Hydroxide	(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.	(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)]	Noncompliance – The facility is using a scrubber and demister control device to remove water soluble air contaminants. The operational parameters are maintained within their respective operating ranges. Records were provided showing daily measurement results. The facility states the scrubber is inspected each weekend and internally flushed. The facility maintains a Wet Scrubber Log identifying the monthly maintenance for scrubber C10 and C70. The facility records scrubber maintenance activities which occur weekly. The

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B. Process P80A, Control C10, Stack S98 – Interior Caustic Pre-flush (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 Spin Washer (steel drums)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		[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 interval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and maintenance/repair (as necessary) of: (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)]	(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 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)]	records for Jan 2016 through February 2017 fail to include the time and initials of the person performing each inspection as required by condition B.1.c.(3)(a).
2. Visible Emissions	(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]	Compliance -- During this inspection a large white plume of water vapor was present.

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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)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter Emissions	(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 conditions are included so that the facility-wide modeled PM2.5 – 24 hr concentration (facility impact + background conc.) does not exceed the ambient air quality (24-hr) standard for PM2.5. 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 emissions (U.S. EPA Method 202) or another 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 monthly 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)]	No Evidence of Noncompliance – The particulate matter emissions from the combustion of natural gas is believed to be in compliance based on known emission factor data for natural gas combustion. The actual physical stack dimensions were not measured during this inspection. The measurements will be made once construction is complete. Fuel records were not provided by the facility during this inspection. Heaters P12, P13, P14, P15, and P42C were inspected and verified to be fueled with natural gas. The facility will be requested to provide a copy of these records.
2. Visible Emissions	(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-	(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]	Compliance – The facility emissions were observed for visible emissions during this inspection. Based on my observations, most of these sources had visible emissions of 15 percent opacity or less.

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C: Process P12, Control C10, Stack(s) S97, S98 – Water Heater 2 (2.0 MMBtu/hr Natural Gas Fired)
Process P13, Control C10, Stack(s) S97, S98 – Oil/Water Heater 3 (2.0 MMBtu/hr Natural Gas Fired)
Process P14, Control C10, Stack(s) S97, S98 – Caustic Heater 2 (3.6 MMBtu/hr Natural Gas Fired)
Process P42, Control C10, Stack(s) S97, S98 – Caustic Heater 1 and 2,000 gallon tank (2.0 MMBtu/hr Natural Gas Fired)
Process P42.0, Control None, Stack S62 – Hot Water Heater (0.75 MMBtu/hr Natural Gas Fired)
Process P44, Control C10, Stack(s) S96, S98 – Drying Oven/Planer (0.75 MMBtu/hr, Natural Gas Fired)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		RSG-142)]	(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 P45 – Plastic Drum Wipe Cleaning

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Volatile Organic Compounds	(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 containers labeled as waste solvent and handled in accordance with local, state and federal regulations. (c) Follow operating procedures which prevent solvent from	(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.	(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)]	Compliance – The permittee uses only acetone at this process. The acetone does not contain any regulated VOCs. Monthly records show compliance with this permit limitation.

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D. Process P45, Station 15, Plastic Drum Wipe Cleaning

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	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)	Stats. (permit 14-RSG-142)] [see Note (2)]	(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)]	
2. Hazardous Air Pollutants	(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)]			Compliance – The facility tracks HAP emissions.

E. Process P71, Hunger 3HP Steel Drum Painting

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Volatile Organic Compounds	(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)]	Compliance – Facility records show the solvents used for this process contain no VOCs.

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POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
. Hazardous Air Pollutants.	(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)]			Compliance

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
. State HAP Hydrochloric Acid	(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 hydrochloric acid off the source property that exceeds 746 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) [redacted] 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) [redacted] 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 LB 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) [redacted] pressure drop across the acid scrubber; (b) [redacted] 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 scrubber C10 in section LB of this permit.	No Evidence of Noncompliance – The facility monitors the acid scrubber on a daily basis insuring the liquor flow rate, pressure drop and pH is maintained within the range recommended by the manufacturer. The facility maintains a monthly log of inspections of scrubber C70.

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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)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter (PM)/PM_{10}/$PM_{2.5}$	(1) For P32C/Stack S12C, the more restrictive of: (a) 0.40 lb. particulate matter per 1000 pounds of gas. (b) E = 3.59P0.62 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) PM10 or PM2.5 emissions may not exceed the following: (a) 0.287 pounds PM10 per hour from stack S12C (b) 0.287 pounds PM2.5 per hour from stack S12C [s. NR 404.08(2), Wis. Adm. Code, ss. 285.65(3) &(7), Wis.	(1) Whenever the spray booth (P32C) is in operation, particulate matter emissions shall 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)] (5)(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	(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 emissions (U.S. EPA Method 202) or another 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 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-	(1) No Evidence of Noncompliance – The paint spray booth filters are maintained and replaced daily. (2) No Evidence of Noncompliance – Emissions from natural gas combustion are believed to be in compliance with this emission limitation. Please see discussion section for additional sources of PM from this stack. (3) Compliance (4) Noncompliance – The particulate matter emissions from the spray paint operations are controlled by a paint arrestor. A 3200 Series Spra-gard high efficiency paint filter was being used at the time of this inspection. The initial efficiency is rated at 97.0 to 98.0% average efficiency range for waterborne bake enamel

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G: Process P32C, Control C320 (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)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	Stats. (permit 14-RSG-142)] (5)(a) Height of each stack S53, S12B, and S12C shall be at least 35 feet above ground level. (b) Stack S53 shall have an outlet 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, ss. 285.65(3), (7), Wis. Stats. (permit 14-RSG-142)] Note: The above stack height conditions are included so that the facility-wide modeled PM2.5 – 24 hr concentration (facility impact + background conc.) does not exceed the ambient air quality (24-hr) standard for PM2.5. Stack S12B has an obstruction (rain hat).	atmosphere (via stack S12C) at a flow rate of 15,000 acfm or greater when the paint booth is in operation. [ss. 285.65(3) &(7), Wis. Stats. (permit 14-RSG-142)]	RSG-142)]	or ≥ 98% efficient when tested by ASHRAE Method 52.1 in accordance with 40 CFR Part 63 NESHAP subpart HHHHH (Paint Stripping and Miscellaneous Surface Coatings at Area Sources). (5) Inconclusive/Further information needed - The facility did not provide drawings, blueprints or other records showing the physical stack parameters. The actual physical stack dimensions were not measured during this inspection. The measurements will be made once construction is complete. A follow-up request will be made to obtain this information.
2. Visible Emissions	(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 serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance – Based on my observations during this inspection, visible emissions from this stack were less than 5 percent opacity.

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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 P500, Control <none>, Stack S53 – Closed Drum Drying Oven (0.6 MMBtu/hr Natural Gas Fired)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
3. VOC Emissions	(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 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	(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)] (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: $VOCa = [(VOCc \times Qc) + (VOCt \times Qt)]/(Qc + Qt)$ 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 added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code (permit 14-RSG-142)] (3) The permittee shall prepare following records, within 15 days after end of each calendar month:	(1) Whenever the organic solvent content, the volume of solids, the weight of solids, the water content and the density of surface coatings is required to demonstrate compliance, the permittee shall use U.S. EPA Method 24 or 24A or another test method approved 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. (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 Qc and Qt needed to calculate VOCa 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)]	(1) Inconclusive/Further information needed – The facility is applying water based coatings with a VOC content of less than 3.5 gallons VOC per gallon. The facility is currently researching if these coatings are extreme performance coatings and agreed to provide the department this information when available in a March 28, 2017 email to the department. As of the date of this report, this information has not yet been received. The permittee states that the coatings are not thinned. (2) Compliance – The permittee only uses acetone for spray paint clean-up. During this inspection, there was no VOC solvent identified while touring the production area.

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G. Process P32C, Control C32C (Overspray Filter), Stack S12C – Auto Exterior Drum Spray Booth
Process P32B, Control none, Stack S12B – Spring 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)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	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 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)]	(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), 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)]	(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)]	(3) Compliance – The facility maintains a record of each type of coating and the amount used. The monthly average usage is in compliance. (4) No Evidence of Noncompliance – All containers observed in the production area were closed or sealed.

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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 S58 – Closed Drum Drying Oven (0.5 MMBtu/hr Natural Gas Fired)

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
4. HAP emissions	(1) The permittee shall meet all applicable requirements in section LH (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 LH (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 LH (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)]	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]

	COMPLIANCE STATUS
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)]	1. Compliance – The facility is using only coatings that comply with the 2.6 lb HAP per gallon coating solids.

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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)

	COMPLIANCE STATUS
. Condition Type: Compliance Options . 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 make this determination, you shall use at least one of he 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 entire affected source. You may use different compliance options for different coating operations, or at lifferent times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when he 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 shall document this switch as required by Condition .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 HAP 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 he 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 operation or operations is less han 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.	2. Compliance – The permittee states that the coatings are used as received and are not thinned.
. Condition Type: General Compliance Requirements . 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)]	3. Compliance – The permittee is using the compliant material option.
. Condition Type: Compliant Material Option . 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	4. Compliance

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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]

	COMPLIANCE STATUS
months. Hc = [Dc x Wc]/Vs Where, Hc is the organic HAP content of the coating, kg (lb) of organic HAP emitted per liter (gallon) of coating solids used; Dc 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; Wc 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; Vs 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 ss. 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 the reporting period because you used no coatings for which the organic HAP content 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)]	

III. Conditions Applicable to the Entire Facility

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
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)]	(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	(1) The permittee shall collect and record the following information: (a) A unique name or identification number for each HAP containing material used in processes P44, and P32C. (b) The HAP content of each federal HAP (e.g. methylene chloride, methanol, toluene, etc.) in each HAP containing material (in pounds per gallon), as applied. (c) MSDS or equivalent document	(1) Inconclusive/ Further Information needed-- The facility has reported individual HAP emissions from the materials purchased/used (paints/coatings/cleaners) to demonstrate compliance with this limitation. The facility has not quantified the contributing HAP emissions from processing waste residues from used drums. The facility has not identified this source of HAPs within the construction permit application.

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[illegible] Conditions Applicable to the Entire Facility

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	(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-142)] (4) The facility shall only operate within the period 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 PM2.5 – 24 hr concentration (facility impact + background conc.) does not exceed the ambient air quality (24-hr) standard of 35 µg/m3 for PM2.5.	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 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).	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-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]	[redacted] The facility acknowledged that they would follow-up on this request in their May 12, 2017 response to the department but no further information was received as of the date of this report. (2) Inconclusive/ Further information needed - The facility has reported the combined HAP emissions from the materials purchased/used (paints/coatings/cleaners) to demonstrate compliance with this limitation. The facility has not quantified HAP emissions from processing waste residues from used drums. The facility has not identified this source of HAPs within the construction permit application. [redacted] The facility acknowledged that they would follow-up on this request in their May 12, 2017 response to the department but no further information was received as of the date of this report. (3) Compliance – The monthly records kept by the facility show compliance. (4) Compliance – The daily records kept by the facility show compliance.

ZZZ. Conditions Applicable to the Entire Facility				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		[s. 285.65(3), Wis. Stats. (permit 14-RSG-142)]	(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)]	
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	(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)]	(1) Inconclusive – The facility has reported individual HAP emissions from the materials purchased/used (NaOH and HCl) to demonstrate compliance with this limitation. The facility has not quantified the contributing HAP emissions from processing waste residues from used drums. The facility has not identified this source of HAPs within the construction permit application. [redacted]

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POLLUTANT	LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		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. 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]*		
. 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 Natural Resources, Southeast Region Air Program,	(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	None Applicable.	(1) Compliance – The facility has submitted a Malfunction Prevention and Abatement Plan. An updated MPAP dated May 10, 2017 was submitted to the department following the inspection. (2) No Evidence of Noncompliance (3) Compliance

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ZZZ. Conditions Applicable to the Entire Facility

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	Milwaukee 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]	on good engineering practice as established by operational history, 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 operation at capacity is not feasible, the source shall operate at a capacity level which is approved	(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.	No Stack Testing has been requested to date.

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ZZZ. Conditions Applicable to the Entire Facility

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	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 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	(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 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		Compliance

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POLLUTANT	LIMITATIONS	COMPLIANCE DEMONSTRATION	REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	upon request during normal business hours. [s. NR 439.04, s. NR 439.05, Wis. Adm. Code]	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. (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:	None Applicable.	None Applicable.	

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ZZ. Conditions Applicable to the Entire Facility

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	(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)]			
. Construction 'ermit 14-RSG-42 Transitional anguage	(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 purposes 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	(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	None Applicable.	(1) Compliance – The permittee has updated the department with dates of installation and operation for new emission sources. (2) Compliance – The permittee was granted an 18 month extension to the construction permit 14-RSG-142 on August 9, 2016. The authority to construct expires March 9, 2018.

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ZZZ. Conditions Applicable to the Entire Facility

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	equipment shakedown, testing and Department evaluation of operation to assure conformity with the permit 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 (permit 14-RSG-142)] (4) Compliance Reports/Records. The permittee shall submit periodic monitoring reports and certification of compliance as	operational. [s. NR 439.11(1), Wis. Adm. Code (Permit 14-RSG-142)] (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)]		(3) Compliance – The permittee has submitted a Malfunction Prevention and Abatement Plan dated March 22, 2017. Comments and requested corrections were sent to the facility on April 6, 2017. An updated plan dated May 10, 2017, was submitted to the department following the inspection.

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ZZ: Conditions Applicable to the Entire Facility

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	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. (4) 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)]		(4) Inconclusive/ Additional information needed – It is believed that there are potentially significant emission sources that have not been included within the original permit application. Specific details on these emission sources are described in the "Inspection Field Notes and Discussion" section of this report. The facility has not submitted any updates of the permit application for Construction Permit 14-RSG-142 to include these sources, as required in ZZZ.7.b.(3). Therefore, the Department will request the permittee submit a timely permit revisions to address air pollution sources that were not disclosed within the plans and specifications approved under construction permit 14-RSG-142.

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CLCM ST FRANCIS - 341158070

FACILITY REPORTING REQUIREMENTS:

Requirement	Frequency and/or Due Date	Compliance Status
Annual Compliance Certification (Operation Permit)	Due annually March 1	COMPLIANCE
Annual Air Emission Inventory	Due annually March 1	COMPLIANCE
Semi-annual Compliance Monitoring Reports (Operation Permit)	March 1 and September 1	COMPLIANCE
Semi-annual Deviation Report (NESHAP)	March 1 and September 1	COMPLIANCE

RESULTS OF PREVIOUS FCE REPORTS/SITE VISITS:

FCE Report Date	Result	Comments
None		

RESULTS OF PREVIOUS EMISSION TESTS:

Source	Test Date	Pollutant(s)	Emission Limit	Result	Comments
None					

SUMMARY OF PREVIOUS COMPLAINTS:

Complaint Date	Complaint Description	Follow-Up Action	Comments
2/27/2017	Odor	Surveillance	Odors detected at level 4
12/20/2016	Odor	Surveillance	Minor odors
12/01/2016	Odor	Surveillance	Odors detected at level 2.
9/9/2016	Odor	Surveillance	No survey noted
6/15/2016	Odor	Surveillance	Plant idle
6/14/2016	Odor	Surveillance	Odors detected at level 5
5/25/2016	Odor	Surveillance	Odors detected at level 3
5/24/2016	Fire/Smoke	Surveillance	No burn identified
5/21/2016	Odor	Surveillance	Odors detected at level 3
4/18/2016	Odor	Surveillance	Odors detected at level 7
4/14/2016	Odor	Surveillance	Odors detected at level 7
4/3/2016	Odor	Surveillance	Odors detected at level 7
3/22/2016	Odor	Notified company	
1/16/2016	Odor	-	-
12/10/2015	Odor	Notified company	Request to company for Odor Mitigation Plan.
12/08/2015	Odor	Notified company	
12/04/2015	Odor	Notified company	
10/30/2015	Odor	Surveillance	Odors objectionable, LON issued.

CLCM ST FRANCIS - 341158070

SUMMARY OF PREVIOUS ENFORCEMENT ACTIONS:

Action Date	Action Type	NR Code Cited	Resolved	Comments
11/02/2015	Letter of Noncompliance	NR 429.03(2)(a) W.A.C.	No	Odor mitigation plan submitted and planned stack height increase.

INSPECTION FIELD NOTES AND DISCUSSION

The purpose of this inspection was to determine the facility's compliance status with respect to Wisconsin's air pollution control regulations and the facility's Air Construction Permit 14-RSG-142. This inspection was coordinated with Mr. Mark Ferguson, Facility Manager of CLCM St Francis. Also present during this inspection was Amy J. Litscher – President, Saga Environmental & Engineering, Inc. and Daniel Heilenberg - WDNR. During the inspection, the weather conditions were partly cloudy with winds from the east at 5 to 10 miles per hour. The temperature was 45 °F. Prior to the start of the inspection, I observed the facility for visible emissions. A blue plume of smoke was noted from a stack near the center and east end of the plant. The opacity ranged from 0 to 15 % opacity. All remaining stacks had visible emissions of 5 % or less. We also surveyed the facility for malodorous emissions. While upwind of the plant, no odors were detected. When approaching the plant on Pennsylvania Ave., I noted the paint curing oven type emissions. On a scale of 1 to 10, with 10 being objectionable, I placed the intensity at 5. Accompanying the paint curing type fumes was a chemical solvent type odor that was present at an intensity level of 2. The inspection started at 10:00 AM. During this inspection, the facility was in operation. While at this facility, I noticed a distinct chemical odor while inside the plant.

PERMITTING

We started the discussions with a review of plant operations and the processes for which the construction permit application covered. We also reviewed some items that were believed missing from the permit application, namely; process emissions related to the drum contents. The permittee agreed that they had failed to include emissions from the residual material removed from the drums during processing. Some of the materials noted within drums in the staging area include acids, racing fuel, ammonia, antifreeze, oils, etc. These residual drum contents are combined with the caustic solution in the pre-flush tank, with exception to oils which are segregated and stored in the waste oil storage tank. Previously undisclosed emissions from the "residual contents" are heated to 185 Deg F within the pre-flush solution. This solution is recirculated within the various rinsing operations that are supplied by the pre-flush tank. The types of "residual contents" may include not only VOC emissions, but particulate matter, and possibly State and Federal HAPs. The permittee agreed to consider all possible emission sources and would review available information from their industry association. In addition to this, the Department urged the facility to look closely at the SDS data for the products that the drums once contained. As of the date of this report, further information on these potential sources was not yet submitted. As this information was admittedly not included within the construction permit application, the facility will need to resolve this by addressing permit conditions I. ZZZ. 7, b. (3) *Submittal of Updates* and I.ZZZ.7.a.(4) - *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.*

ODOR MANAGEMENT

The facility has received a number of odor complaints from people located to the west and northeast of this plant; please refer to complaint summary for specific details. On November 15, 2015, the facility was issued a Letter of Noncompliance due to significant and objectionable odors witnessed during one of the complaint investigations. The facility responded to this LON by having vendor technicians review the operations of the control devices. As of November 2015, the facility drains and flushes the wet scrubber C10 every weekend. The facility also developed an Odor Prevention and Abatement Plan dated November 13, 2015. The plan identifies many of the permit limitations relating to processes and related monitoring and record keeping requirements. The plan provides a procedure for responding to complaints about odors. (Process and control device operating records are reviewed and corrective actions would be implemented, where necessary.)

The odors that I witnessed historically from this facility are primarily associated with four operations. These are the paint baking oven, plastic barrel flamer, fumes from drum residual and characteristic of the chemicals within, and the wet scrubber discharge. Each process has a unique smell associated with it. The paint baking oven can be somewhat pungent (aldehydes) and burnt at times, the flamer emissions smell of a strong polyethylene type smell, the general nature of organic solvent smell from the conglomeration of chemicals in the pre-flush solution, and the stench of sewer type odor when the biological activity of the scrubber liquor gets elevated. To reduce the intensity of solvent/chemical type smells, the facility is proposing to install a 20 foot extension to the existing wet scrubber stack C10. This should aid in dispersing and reducing the ground level intensity of the compounds being emitted from this stack. The facility cleans and rinses the scrubber C-10 on a weekly basis and this has prevented the sewer gas type smell from the wet scrubber discharge stack. I have witnessed very little change in the odors associated with the paint curing oven and the polyethylene

drum flamer. The November 2015 LON against this facility remains open at this time. There are additional areas where the facility may contain and control potential odors, such as covering the waste water treatment process that processes strong solvent smelling waste water. Other areas should also be investigated for odor generating potential and necessary odor mitigating actions/process controls.

Label Stripping Process P44, Fugitive F44

The 2016 Safety Data Sheet for Flo-Strip® data is insufficient to verify compliance with the VOC and HAP limits. The facility was requested to obtain a technical datasheet for this product or have vendor supplied content data.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Spray Paint Coatings

The facility assumes that the exterior pigmented coatings being used are extreme performance coatings and subject to the 3.5 lbs VOC/ gallon limitation. The permittee is currently in contact with each paint vendor to determine and verify that each of the coating being used are indeed extreme performance coatings. The permittee has agreed to provide the department this information when available. Therefore the compliance status for this limitation is identified as inconclusive and requires additional information prior to determining compliance status.

RECOMMENDATIONS/CONCLUSIONS

The facility has noted or continuing areas of noncompliance that should be dealt with through the enforcement process. It is recommended that this facility be compelled to provide the potential air pollutant information for each process operating at this facility and supplement and/or apply for air permits that appropriately account for all emissions. Furthermore, in addition to the specific emissions data being emitted from drum reclamation processing, the facility should be requested to develop a material acceptance/rejection and management plan specific to each potential chemical waste entering this process. . Timing of the next compliance inspection will depend on the determination of appropriate operation permit classification (i.e. synthetic minor and/or title V).

SAFETY EQUIPMENT REQUIRED:

- ☒ HEARING PROTECTION
- ☒ HARD HAT
- ☒ SAFETY GLASSES
- ☒ SAFETY SHOES
- ☐ OTHER

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
SOUTHEAST REGION
FULL AIR COMPLIANCE EVALUATION (FCE) SUMMARY

FID: 241021220	**FCE/SITE VISIT DATE:** March 28, 2017 ☒ EPA Committed FCE ☐ Uncommitted FCE **Announced Inspection** ☒ Yes ☐ No
FACILITY NAME AND LOCATION: Mid-America Steel Drum Company 8570 South Chicago Street Oak Creek, WI 53154-3518	**EPA CLASS TYPE:** A – Part 70 Major Source
COUNTY: MILWAUKEE	**SIC AND NAICS CODES AND DESCRIPTIONS:** SIC: 4312 – Metal Barrels, Drums and Pails NAICS: 332439 – Other Metal Container Manufacturing
INSPECTION PARTICIPANTS: Kevin Meyer – Mid-America Steel Drum Co. Lauren Laabs – Mostardi Platt Mike Griffin – WDNR	**APPLICABLE AIR PROGRAMS:** Prog./Pmt. Code: NR 445 ☒ PSD ☐ NAA ☐ P60 NSPS ☐ P61 NESHAP ☐ P62 NESHAP MACT ☐ P63 NESHAP MACT ☒ P63 NESHAP GACT ☐ P64 CAM ☐ P75 CEM ☐ P76 ACID RAIN ☐
Credentials Shown: ☒ Yes ☐ No	

TOTAL REPORTED ACTUAL FACILITY EMISSIONS IN TONS/YEAR*:

	PM	SO_2	NO_X	VOC	CO	PM_{10}	HAP
2016 (uncertified)	*5.0*	-	*2.0*	*59.3*	*1.7*	*4.9*	*0.85*
2015	6.2	-	5.9	73.9	-	6.0	15.9
2014	11	-	-	90.6	-	10.7	23.1
Class Code	B	B	B	A	B	B	A
Attainment Status	Attn.	Attn.	Attn.	Attn.	Attn.	Attn.	Attn.
PSD Major	no	no	no	no	no	no	no

*Emission data above is from the emission inventory. The 2016 data has not been certified.

IS FACILITY IN COMPLIANCE WITH ALL WISCONSIN AIR REGULATIONS?

☐ Yes ☒ No ☒ Additional Information Is Also Needed for a Complete Evaluation.

Are permit revisions needed? ☒ Yes ☐ No (If yes, see gray colored areas)

INSPECTOR SIGNATURE: Michael Griffin **SIGNATURE DATE:** 05/31/2017
TITLE: Air Management Engineer

SUPERVISOR SIGNATURE: Kendra Fisher **SIGNATURE DATE:** 6/1/2017
TITLE: Supervisor

Cc: Bureau of Air Management - Compliance, AM/7
Facility

FACILITY INFORMATION

FACILITY CONTACT:	FACILITY CONTACT PHONE/EMAIL:
Mike Higgins – General Manager, Mid-America Steel Drum Co.	(414) 762-1114 // mhiggins@masdinc.com
Kevin Meyer – Facility Manager, Mid-America Steel Drum Co.	(414) 856-1475 // kmeyer@masdinc.com

FACILITY AIR PROGRAMS:

Air Program	Subpart	Citation
NESHAP	40 CFR part 63, Subpart MMMM	National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products

FACILITY DESCRIPTION:

Mid-America Steel Drum Co. reconditions used steel drums. Containers of various sizes are received from many different companies and are sorted. Only 55 gallon metal drums are reconditioned at this facility. Soiled metal drums are thermally cleaned, shot blasted, reshaped/resealed, painted and resold. The facility operates as a part 70 source and is a major source for both volatile organic compounds (VOC) and federal hazardous air pollutants (federal HAP). The facility is subject to the Surface Coating of Miscellaneous Parts and Products rules of 40 CFR Part 63, subpart MMMM. This facility is located in an area designated as attainment for all primary criteria pollutants.

POINT/PROCESS DESCRIPTION:

Drum Reclamation Furnace (P30, S10, C30):

The Balboa Pacific drum reclamation furnace was installed in 1995. Soiled open-end-style drums, lids, bands and liquid wastes are conveyed into a Balboa Pacific reclamation furnace. This furnace is designed to receive two hundred and fifty 55 gallon steel drums per hour with up to 4 pounds of residual material per drum.

The Balboa Pacific drum reclamation furnace consists of a mechanical conveyor, primary combustion chamber and a thermal afterburner. The reclamation furnace burns (incinerates) the residual drum contents, coatings, adhesives, plastic labels, stickers, sealants and other combustible materials. The furnace temperature is maintained at 1100°F to 1400 °F. Below the primary combustion chamber is a cooling bath where the mechanical chain conveyor is cooled and draws submerged ash to a central collection system. The chain cooling trough is located at the last 10 feet of the chain conveyor where the water is replenished with nonhazardous waste water. Volatile organic compounds and organic hazardous air pollutant emissions are controlled by an afterburner mounted directly above the furnace. The reclamation furnace has 12 natural gas burners with a combined fuel burning capacity of 19.5 MMBtu/hour. The afterburner is a one pass thermal oxidizer that is equipped with 4 natural gas burners with a combined fuel burning capacity of 6.5 MMBtu/hour. The set point for the afterburner temperature is maintained at greater than 1650°F. Part of the exhaust from the afterburner can be directed to the waste heat recovery boiler. A fume hood at the discharge end of the furnace was added prior to 2014, venting emissions uncontrolled. The process air flow averages 63,000 cfm through the afterburner (from 2014 stack test) and approximately 1200 cfm through the bypass stack (provided by CLCM on May 12, 2017).

Waste Heat Recovery Pressure Vessel/ Boiler (B10, S10A):

The stack associated with the drum reclamation furnace process, Stack S10, is fitted with a bypass duct to allow hot exhaust gases from the afterburner to be routed through a waste heat recovery pressure vessel (boiler). The boiler is rated at 30 horsepower and produces 160 psi steam. It is estimated that no more than 10% of the exhaust gas stream from the afterburner is routed to the boiler. The boiler is not equipped with a burner, rather it is a pressure vessel used to recover waste heat from the oxidizer. Steam from this unit is used to provide a steam curtain at the entrance and exit to the reclamation furnace for fire/combustion control. Steam from this unit was also previously used to heat hot water for the former 12-stage closed drum caustic washers. The 12-stage closed drum caustic washers were removed from service in June 2015. The boiler does not have any fuel burning capability. The boiler has its own exhaust stack identified as S10A.

Caustic drum cleaning (P31, S11) (Removed from Service in June 2015)

Used, sealed-top drums were previously cleaned using a 12-stage washer. The washing operation consisted of a series of hot water rinses and caustic cleaning operations. The washing solution contained a 10% solution of sodium hydroxide. Drums were brought in on a conveyor and the rinse solutions were pumped into each drum. Each drum was then drained and the used rinse solution was returned to a holding tank. Emissions were indoor fugitive. An operation permit revision was submitted by the facility on May 12, 2017, to indicate this source has been removed from this facility in June of 2015.

Three (3) Shot Blasting Units (P32, C02, S12):

After being thermally baked in the drum reclamation furnace, the drums, lids and rings are conveyed to the shot blasting room. Here there are three shot blast stations that remove the burnt residue and char using steel shot. The three shot blast booths each are designed for a specific task. Lids are individually loaded into a slot for shot blasting. Rings are bunched and loaded into a "Bronco" shot blast unit for cleaning. The third unit is an automated Wheelabrator shot blast unit where each drum is loaded into the machine and the cleaned drum is discharged from the rear of the unit. Emissions from each shot blast unit are combined and routed to a cartridge filter type baghouse located to the north of the shot blast room, just outside the building. Prior correspondence with the company indicated that the baghouse discharge exhaust air is entirely routed back into the facility. During this inspection, a second vent allowing emissions from the baghouse to discharge directly to the ambient air was observed. Please refer to the Inspection Field Notes and Discussion section for additional details.

Interior Drum Paint Spray Booth (P33, S13, C33): Cured Coating

The Interior Drum Coating Line was installed in 1972. The interior coating is a one layer coating that can have the thickness varied depending on the customer's specifications. Currently, a heatset phenolic epoxy coating is the only coating applied to the open drum interiors. The inside of the mating drum lid is also coated with the phenolic epoxy resin. Both the drums and lids are loaded into a conveyorized curing oven/tunnel for thermal curing. This process takes 5 to 7 minutes. The curing oven is natural gas-fired, rated at 2.0 MMBtu/hr, and is set at 425-475 °F. Emissions from the paint spray booths have a fiberglass type filter and vent separately outside the building. The drying oven has a separate stack and also vents outside the building.

Exterior Drum Paint Booths (P34, S14, C34): Air Dried Coating

The exterior coating system was installed in 1972, and consists of two spray booths (drum and lid), a conveying line, and a drying oven (275°F - 300°F). An assortment of colored water based coatings are used on this line. The booths are equipped with three (3) air assisted airless guns where paint is manually applied to the drum exterior. Each booth has a filter where disposable fiberglass filters are replaced daily. The two booths share the same natural gas-fired drying oven/tunnel (1.25 MMBtu/hr). The booths and oven separately vent outside the building from fixed exhaust stacks.

Drum Ring Dip Tank (P37):

This process was also installed in 1972. Rings which are used to hold the lid on open top drums are hand dipped in a tank of size 3' x 8" x 3'. Lids are dipped in a water based coating and hung on a horizontal rod and are allowed to air dry. Emissions from this process are considered an indoor fugitive.

PERMIT(S) ISSUED:

PERMIT NO.	ISSUE DATE	PURPOSE OF PERMIT	EXPIRATION DATE
Order AM-90-22	November 29, 1990	Established in-line averaging as a method of demonstrating compliance for the coating operations. (P11, P13 & P14)	None
241021220-P01	November 21, 2003	Operation Permit	November 21, 2008
241021220-P02	-	Operation Permit Revision to raise PM emission limit for reclamation furnace	-
241021220-P10	January 2, 2009	Operation Permit	January 2, 2014
241021220-P20	June 11, 2013	Operation Permit	June 11, 2018
241021220-P30	*APPLICATION DUE* *DEC 11, 2017*	Operation Permit Renewal	-

COMPLIANCE SUMMARY

Stack/S10, Process/P30, Control Unit/C30 – Drum Reclamation Furnace (Balboa Pacific), installed in 1995				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 3.3 pounds per hour from Stack S10. [s. 285.65(3), Wis. Stats., and ss. NR 415.05(1)(o) and NR 404.08(2), Wis. Adm. Code] (2) Stack S10 shall have the following stack parameters: (a) The stack height shall be at least 40 feet above ground level; (b) The equivalent stack inside diameter at the outlet may not exceed 4.76 feet; and (c) This stack may not be equipped with a rainhat or other device that will impede upward momentum of the exhaust gas. [s. 285.65(3), Wis. Stats., and ss. NR 404.04 and NR 407.09(2)(d)3., Wis. Adm. Code]	(1) The permittee shall operate the afterburner at all times when the drum reclamation furnace is operating. When visible emissions are observed exiting the furnace, the permittee shall operate the steam curtain to reduce emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (2) When the drum reclamation furnace is operating, the permittee shall maintain the operating setpoint temperature of the afterburner at or above 1650°F and monitor the combustion temperature of the afterburner. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (3) The permittee shall annually inspect the operational condition and integrity of the afterburner and verify all relevant interlocks with the process. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (4) The furnace shall be operated and maintained in accordance with the manufacturer's recommendations. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (5) The permittee shall	(1) Reference Test Method for Particulate Matter Emissions: When particulate matter emission testing is required to demonstrate compliance, the permittee shall use USEPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 including condensible backhalf emissions (USEPA Method 202). [ss. NR 407.09(1)(c)1. and NR 439.06(1), Wis. Adm. Code] (2) The permittee shall monitor and record the temperature in the primary chamber of the afterburner at least once every 15 minutes. [ss. NR 407.09(1)(c)1., NR 439.04(1)(d), NR 439.055(1)(d) and NR 439.055(6), Wis. Adm. Code] (3) The permittee shall maintain a log for the control device and monitoring equipment detailing all routine and non-routine maintenance, including monitoring equipment calibrations, performed and including dates and duration of any outages. This log shall be used to document all inspections required under I.ZZZ.2.b.(2). [ss. NR 407.09(1)(c)1., NR 439.04(a)3.b. and NR 439.04(1)(d), Wis. Adm. Code] (4) The permittee shall keep records of the manufacturer's recommendations regarding operation and maintenance of the furnace. [ss. NR 407.09(1)(c)1. and s. NR 439.04(1)(d), Wis. Adm. Code] (5) The permittee shall keep and maintain on-site technical drawings, blueprints or equivalent records of the exhaust stack's physical parameters. [ss. NR 407.09(1)(c)1. and NR 439.04(1)(d), Wis. Adm. Code]	(1) No Evidence of Noncompliance – This process was stack tested in 2014 with the by-pass system disabled. The resulting PM test results show compliance. With the by-pass system in operation at 1200 CFM, it is believed this may decrease the overall control efficiency of PM emissions resulting in a higher rate of PM discharge. The amount of increase in PM emissions is not expected to exceed 30 % by weight under normal operating conditions. Refer to the Inspection Field Notes and Discussion section on page 30 for additional details. (2) COMPLIANCE - The permittee maintains an inspection record and maintenance log. The afterburner records are continuous and show a temperature of ~1700 ± 30° F is being

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A. Stack S10 Process P30, Control Unit C30 – Drum Reclamation Furnace (Balboa Pacific), installed in 1995				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
		determine the physical parameters of the exhaust stack. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]		maintained. Blueprints and drawings were not reviewed as the permittee stated that the stacks for all processes have not changed since the previous inspection.
2. Visible Emissions	No owner or operator of direct source may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20%. [ss. NR 431.05, Wis. Adm. Code]	(1) The requirements in I.A.1.b.(1)-(4) shall be used to demonstrate compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]	(1) Reference Test Method for Visible Emissions: When visible emission testing is required to demonstrate compliance, the permittee shall use USEPA Method 9. [ss. NR 407.09(1)(c)1. and NR 439.06(9)(a)1., Wis. Adm. Code] (2) The monitoring and record keeping requirements in I.A.1.c.(3)-(5) shall be used to demonstrate compliance. [ss. NR 407.09(1)(c)1. and NR 407.09(1)(c)1.b., Wis. Adm. Code]	Compliance – During this inspection the visible emissions from Stack S10 were less than 10% opacity and in compliance.
3. Volatile Organic Compound (VOC)	(1) Process lines on which construction or modification commenced on or after August 1, 1979, and which are not subject to emission limitations listed elsewhere in chs. NR 419 to NR 423 shall control volatile organic compound emissions by at least 85%. [s. NR 424.03(2)(b), Wis. Adm. Code]	(1) The requirements in I.A.1.b.(1)-(4) shall be used to demonstrate compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]	(1) Reference Test for Volatile Organic Compound Emission Rates: When emission testing of volatile organic compound (VOC) emission concentrations or emission rates is required to demonstrate compliance, the permittee shall use USEPA Method 18, 25, 25A or 25B. [ss. NR 407.09(1)(c)1. and NR 439.06(3)(a), Wis. Adm. Code] (2) The monitoring and record keeping requirements in I.A.1.c.(3)-(5) shall be used to demonstrate compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]	(1) No Evidence of Noncompliance - Similar to the PM issue above, some of the VOC emissions are also bypassing the oxidizer due to the operation of a fume hood at the drum reclamation oven discharge. With the by-pass system in operation at 1200 CFM, it is believed this may decrease the overall control efficiency of VOC emissions resulting in a higher rate of VOC discharge. The amount of increase is not expected to decrease

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2. Stack S10, Process P30, Control Unit C30 – Drum Reclamation Furnace (Balboa Pacific) installed in 1995				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
				the system overall control efficiency to a value of less than 85% under normal operating conditions. Refer to the Inspection Field Notes and Discussion section on page 30 for additional details. The permittee is maintaining the combustion chamber temperature above 1650 °F.

3. Stack S10A, Process B10 – Waste Heat Recovery Boiler				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
1. Particulate Matter	(1) Particulate matter emissions may not exceed 0.2 pounds per hour from Stack S10A. [s. 285.65(3), Wis. Stats., and ss. NR 415.05(1)(c) and NR 404.08(2), Wis. Adm. Code] (2) Stack S10A shall have the following stack parameters: (a) The stack height shall be at least 25.5 feet above ground level; (b) The equivalent stack inside diameter at the outlet may not exceed 1.08 feet; and (c) This stack may not be equipped with a rainhat or other device that will impede upward	(1) This boiler shall be operated and maintained in accordance with the manufacturer's recommendations. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (2) The permittee shall determine the physical parameters of the exhaust stack. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]	(1) Reference Test Method for Particulate Matter Emissions: When particulate matter emission testing is required to demonstrate compliance, the permittee shall use USEPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 including condensible backhalf emissions (USEPA Method 202). [ss. NR 407.09(1)(c)1. and NR 439.06(1), Wis. Adm. Code] (2) The permittee shall keep records of the manufacturer's recommendations regarding operation and maintenance of the boiler. [ss. NR 407.09(1)(c)1. and NR 439.04(1)(d), Wis. Adm. Code] (3) The permittee shall keep and maintain on-site technical drawings, blueprints or equivalent records of the exhaust stack's physical parameters. [ss. NR 407.09(1)(c)1. and NR 439.04(1)(d), Wis. Adm. Code]	Compliance – The permittee stated that none of the stack parameters have changed since the previous inspection. PM emission estimates are based on an estimated 10% exhaust stack flow rate. (10 % of the main stack emission rate is 0.22 pounds PM

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B. Stack S10A, Process B10 – Waste Heat Recovery Boiler.				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
	momentum of the exhaust gas. [s. 285.65(3), Wis. Stats., and ss. NR 404.04 and NR 407.09(2)(d)3., Wis. Adm. Code]			per hour.)
2. Visible Emissions	No owner or operator of direct source may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20%. [ss. NR 431.05, Wis. Adm. Code]	(1) The requirement in I.B.1.b.(1) shall be used to demonstrate compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]	(1) Reference Test Method for Visible Emissions: When visible emission testing is required to demonstrate compliance, the permittee shall use USEPA Method 9. [ss. NR 407.09(1)(c)1. and NR 439.06(9)(a)1., Wis. Adm. Code] (2) The monitoring and record keeping requirement in I.B.1.c.(3) shall be used to demonstrate compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]	Compliance – There were no visible emissions from this stack during this inspection.

C. Stack S13, A, B & C, Process P33, Control Unit C33 – Interior (Epoxy) Drum Coating Line, installed in 1972. Stack S14A, B & C, Process P34, Control Unit C34 – Exterior Drum Coating Line, installed in 1972.				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
1. Volatile Organic Compounds (VOC)	(1) No person may cause, allow or permit organic compounds to be used or handled without using good operating practices and taking reasonable precautions to prevent spillage, escape or emissions of organic compounds, solvents or mixtures. Such precautions shall include, but are not limited to the transfer and storage of VOC containing materials (e.g., coatings, cleaning agents and contaminated rags) in closed/covered containers. [ss. NR 419.03(2) and NR 419.04, Wis. Adm. Code (General limitation)] (2) No owner or operator of a miscellaneous metal parts or products	[1] The permittee shall establish and implement operating procedures that take reasonable precautions to prevent the spillage, escape or emission of organic compounds from the handling, transfer, storage and disposal of VOC containing materials (e.g., coatings, cleaning agents and contaminated rags). The operating procedures shall include, but not be limited to, the storage of VOC containing materials in closed/covered containers. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] [2] The permittee shall uniquely identify and determine the VOC content of each coating and cleaning agent applied or used using either; USEPA Test Method 24, Material Safety Data Sheet, or	(1) Reference Test for Volatile Organic Compound Emission Rates: When emission testing of volatile organic compound (VOC) emission concentrations or emission rates is required to demonstrate compliance, the permittee shall use USEPA Method 18, 25, 25A or 25B. [ss. NR 407.09(1)(c)1. and NR 439.06(3)(a), Wis. Adm. Code] (2) Reference Test for Volatile Organic Compound Content: When emission testing of volatile organic compound (VOC) content is required to demonstrate compliance, the permittee shall use USEPA Method 24 or 24A. [ss. NR 407.09(1)(c)1. and NR 439.06(3)(b), Wis. Adm. Code] (3) The permittee shall establish procedures that take reasonable precautions to prevent the	(1) Compliance – During this inspection, each coating being used was contained and closed with the exception of the pumping unit used to deliver paint to the applicator. There were no open containers of solvent present during this inspection. (2) Compliance – During this inspection, a Hentzen epoxy modified phenolic coating Sterilkote® 300

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Stack S15-A, B & C, Process P33, Control Unit C33 – Interior (Epoxy) Drum Coating Line, installed in 1972.
Stack S14-A, B & C, Process P34, Control Unit C34 – Interior Drum Coating Line, installed in 1972.

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
	coating line using a baked or specially cured coating technology may cause, allow or permit the emission of any VOCs in excess of 0.42 kilograms per liter (3.5 pounds per gallon) of coating, excluding water, delivered to a coating applicator. [s. NR 422.15(2)(b), Wis. Adm. Code] (3) No owner or operator of a miscellaneous metal parts or products coating line using an air dried coating technology may cause, allow or permit the emission of any VOCs in excess of 3.5 pounds of VOC per gallon (0.42 kilograms per liter) of coating, excluding water, delivered to a coating applicator. [s. NR 422.15(3)(b)&(c), Wis. Adm. Code] (4) All VOC emissions from solvent washings shall be considered in the emission limitations above unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8), Wis. Adm. Code]	another equivalent form of document. The VOC contents shall be determined in units of measurement sufficient to demonstrate compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code] ☒ The permittee shall use one of the following methods to demonstrate compliance with the emission limitations in Sections I.C.1.a.(2) and ☒ The application of only coatings with VOC contents at or below the allowable emission limitation or The usage of coatings with a daily volume-weighted average VOC content at or below the allowable emission limitation (i.e., in-line averaging). [ss. NR 407.09(4)(a)3.b. and NR 422.04(1) and (2)(a), Wis. Adm. Code] (4) In-line averaging. No owner or operator of a coating line subject to an emission limitation contained in s. NR 422.15 and complying with the emission limitation by means of in-line averaging may cause, allow or permit the daily volume-weighted average VOC content to exceed the emission limitation to which the coatings are subject. The daily volume-weighted average VOC content shall be calculated by using the following equation: $VOCA = [\sum_{i=1}^{n} C_iV_i]/V_T$ where: VOCA is the volume-weighted average VOC content of 2 or more coatings	spillage, escape or emission of organic compounds from the handling, transportation, storage and disposal of VOC containing materials (e.g., coatings, cleaning agents and contaminated rags). These procedures shall include, but are not limited to, the storage of VOC containing materials in closed/covered containers. [ss. NR 407.09(1)(c)1 and NR 439.04(1)(d), Wis. Adm. Code] (4) The permittee shall keep at least weekly records of the following information sufficient to demonstrate daily compliance: (5) The identity of each coating applied or used (Each material used or applied shall be identified with a unique identification number and/or name). (6) The VOC content of each coating, as applied, in units of pounds per gallon (kilograms per liter), excluding water. The VOC content shall be determined either analytically or using manufacturers literature (e.g., MSDSs). If published literature is used to determine the material's VOC content and the literature specifies a range of values, the permittee shall record and use the worst case value when determining compliance. If published literature is used and the material is compounded or thinned, the permittee shall use a mass balance calculation to determine the material's worst case VOC content. All VOC emissions from solvent washings shall be considered in the emission limitations above unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [ss. NR 407.09(1)(c)1. and NR 439.04(1)(d) and (5)(a), Wis. Adm. Code]	was in use. The SDS shows this coating to be in compliance with the VOC content restriction. The remaining coatings show no evidence of noncompliance based on statements from Kevin Meyer. Geoff Westfall promised to submit a complete record of coating data for 2015 and 2016. VOC & HAP content data was received by email on March 30, 2017, and showed each coating that was used at this facility to be in compliance with the respective 3.5 pounds VOC per gallon coating less water and exempt solvents. (3) Compliance – During this inspection, a Watson Standard water based coating Black 3903 was in use. The SDS shows this coating to be in compliance with the VOC content restriction. See discussion under (2)

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C. Stack S15 A, B & C Process P33, Control Unit C33 – Interior (Epoxy) Drum Coating Line, installed in 1972 Stack S14 A, B & C Process P34, Control Unit C34 – Exterior Drum Coating Line, installed in 1972				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods; Recordkeeping and Monitoring Requirements	Compliance Status
		applied on a coating line during any day in kilograms per liter (pounds per gallon) of coating, excluding water i is the subscript denoting an individual coating n is the number of different coatings subject to the same numerical emission limitation applied during any day on a coating line Ci is the VOC content of each coating (i) as applied during any day on the coating line in kilograms per liter (pounds per gallon) of coating, excluding water Vi is the volume of each coating (i), excluding water, as applied during any day on the coating line in liters (gallons) VT is the total volume of all n coatings subject to the same emission limitation, excluding water, applied during any day on the coating line in liters (gallons) [ss. NR 407.09(4)(a)3.b. and NR 422.04(1)(a), Wis. Adm. Code] (5) If cleanup solvents are not directed into containers that prevent evaporation into the atmosphere, the permittee shall determine the amounts used on a daily basis and include the VOC emissions when determining compliance with the emission limitations in Sections I.C.1.a.(2) and (3): [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]	When in-line averaging is used to demonstrate compliance, the permittee shall, in addition to recordkeeping requirements in NR 439.04(5)(a), Wis. Adm. Code (Section I.C.1.c.(4), above), collect and record the following information for each day of operation for each affected line: The name or identification number of each coating applied on each coating line. The volume of each coating applied in gallons (liters), excluding water. The daily volume-weighted average VOC content of all coatings applied on each coating line as defined in s. NR 422.04(1)(a), Wis. Adm. Code, in units of pounds per gallon (kilograms per liter), excluding water. The permittee may elect to define a "coating line" to include more than one coating line, if the product being manufactured is coated on more than one line subject to in-line averaging. [ss. NR 407.09(1)(c)1., NR 422.04(1)(a), NR 439.04(1)(d) and NR 439.04(5)(g)1., Wis. Adm. Code]	above for accounting of other coatings used at the facility. (4) Compliance- The facility avoids washing the paint supply lines. There are 6 dedicated coatings. When a color is switched, the off-color paint in transition is applied to the drum bottoms to reduce waste and the need to clean the paint lines. [redacted]

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Stack S13 A, B & C, Process P35, Control Unit C33 – Interior (Epoxy) Drum Coating Line, installed in 1972.
Stack S14 A, B & C, Process P34, Control Unit C34 – Exterior Drum Coating Line, installed in 1972.

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
. Particulate Matter (PM)	(1) The permittee may not cause, allow or permit the emissions of particulate matter to exceed the allowable emissions calculated using the equation $E = 3.59\ P^{0.62}$ For process weight rates up to 60,000 pounds per hour, where E is the allowable emissions in pounds per hour and p is the process weight rate in tons per hour. If the calculated rate is less restrictive than the applicable concentration specified under s. NR 415.05(1), Wis. Adm. Code (0.40 pounds of particulate matter per 1,000 pounds of gas), based on the maximum exhaust flow rate and normal exhaust gas temperature, this limitation shall apply. [s. NR 415.05(2), Wis. Adm. Code] (2) Particulate matter emissions may not exceed the following emission rate in units of pounds per hour: i) S13A (IC Lid) - 0.003 ii) S13B (IC Drum) - 0.008 iii) S13C (IC Curing) - 0.015 iv) S14A (EC Lid) - 0.008 v) S14B (EC Drum) - 0.008 vi) S14C (EC Dryer) - 0.009 [s. NR 415.05(1)(o) and NR 404.08(2), Wis. Adm. Code] (3) The stack heights shall be at least the following feet above ground	Each spray booth shall be equipped with an overspray filter to control particulate matter emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] The overspray filters shall be in use whenever coating is being applied inside the confines of a spray booth. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] The permittee shall visually inspect the placement and condition of filters at the beginning of each day. The filter media shall completely cover the inlets to the exhaust vents. Overloaded filters should be replaced. If the spray booth is not used on a particular day, daily inspection of its filters is not required. [ss. NR 407.09(4)(a)3.b. and NR 439.055(6), Wis. Adm. Code] (4) The permittee shall determine the physical parameters of the exhaust stacks. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]	(1) Reference Test Method for Particulate Matter Emissions: When particulate matter emission testing is required to demonstrate compliance, the permittee shall use USEPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 including condensible backhalf emissions (USEPA Method 202). [ss. NR 407.09(1)(c)1. and NR 439.06(1), Wis. Adm. Code] (2) Reference Test Method for PM10 Emissions: When PM_{10} emission testing is required to demonstrate compliance, the permittee shall use USEPA Method 201 or 201A. [ss. NR 407.09(1)(c)1. and NR 439.06(1m), Wis. Adm. Code] The permittee shall maintain a log of the daily inspections performed for each booth. Each inspection shall record the following information: (a) The date and time of the inspection. (b) The operational status of spray booth. (c) The placement and condition of the filter. (d) The signature or initials of the person performing the inspection. If a spray booth is not used on a particular day, a daily inspection of the booth is not required. Instead, the permittee shall record the spray booth was not used and the date(s) the spray booth was not used. The permittee may wait until the spray booth becomes operational again before recording this information. [ss. NR 407.09(1)(c)1., NR 439.04(1)(a) & (d) and NR 439.055(2)(b), Wis. Adm. Code] (4) The permittee shall keep and maintain on-site technical drawings, blueprints or equivalent records of the exhaust stacks' physical parameters. [ss. NR 407.09(1)(c)1. and NR	(1) Noncompliance – Facility daily inspection documentation is incomplete indicating noncompliance with maintaining the spray paint fiberglass filter. (2) Noncompliance - The IC and OC filters are manufactured by Chemco Products (Aqua 1) with an efficiency rating of 98.38 %, which is lower than the 98.7% efficiency reported at the time of permit review. This results in theoretical PM emissions in excess of the limits in C.2.a.(2) i), ii), iv), and v). The filters are replaced daily. Please refer to the Inspection Field Notes and Discussion section for additional details. (3) and (4) Compliance – The stack dimensions and discharge profiles were verified during the previous inspection and are believed to be in compliance with these limitations.

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C. Stack S13 A, B & C, Process P33, Control Unit C33 – Interior (Epoxy) Drum Coating Line, installed in 1972. Stack S14 A, B & C, Process P34, Control Unit C34 – Exterior Drum Coating Line, installed in 1972.				
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
	level: i) S13A – 27.2, ii) S13B – 28.8. iii) S13C – 29.5. iv) S14A – 24.9, v) S14B – 24.9. vi) S14C – 24.9. [s. 285.65(3), Wis. Stats., and ss. NR 404.04 and NR 407.09(2)(d)3., Wis. Adm. Code (241021220-P10)] (4) Stacks S13A, S13B and S13C may not be equipped with rainhats or other devices that impede the upward momentum of exhaust gases. [s. 285.65(3), Wis. Stats., and ss. NR 404.04 and NR 407.09(2)(d)3., Wis. Adm. Code (241021220-P10)]		439.04(1)(d), Wis. Adm. Code]	
3. Visible Emissions (VE)	No owner or operator of direct source may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20%. [ss. NR 431.05, Wis. Adm. Code]	(1) The requirements in I.C.1.b.(1)-(3) shall be used to demonstrate compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]	(1) Reference Test Method for Visible Emissions: When visible emission testing is required to demonstrate compliance, the permittee shall use USEPA Method 9. [ss. NR 407.09(1)(c)1. and NR 439.06(9)(a)1., Wis. Adm. Code] (2) The monitoring and record keeping requirements in I.A.1.c.(3) shall be used to demonstrate compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]	Compliance – Visible emissions from each of the coating and drying oven stacks was less than 10 percent opacity.

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Stack S19 (fugitive), Process P37 – Drum Ring Dip Tank installed in 1972.

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
. Volatile Organic Compound (VOC)	No person may cause, allow or permit organic compounds to be used or handled without using good operating practices and taking reasonable precautions to prevent spillage, escape or emissions of organic compounds, solvents or mixtures. Such precautions shall include, but are not limited to the transfer and storage of VOC containing materials (e.g., coatings, cleaning agents and contaminated rags) in closed/covered containers. [ss. NR 419.03(2) and NR 419.04, Wis. Adm. Code (General limitation)] No owner or operator of a miscellaneous metal parts or products coating line using an air dried coating technology may cause, allow or permit the emission of any VOCs in excess of 3.5 pounds of VOC per gallon (0.42 kilograms per liter) of coating, excluding water, delivered to a coating applicator. [s. NR 422.15(3)(b)&(c), Wis. Adm. Code] All VOC emissions from solvent washings shall be considered in the emission limitations above unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8),	(1) The permittee shall establish and implement operating procedures that take reasonable precautions to prevent the spillage, escape or emission of organic compounds from the handling, transfer, storage and disposal of VOC containing materials (e.g., coatings, cleaning agents and contaminated rags). The operating procedures shall include, but not be limited to, the storage of VOC containing materials in closed/covered containers. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (2) The permittee shall uniquely identify and determine the VOC content of each coating and cleaning agent applied or used using either USEPA Test Method 24, Material Safety Data Sheet, or another equivalent form of document. The VOC contents shall be determined in units of measurement sufficient to demonstrate compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code] (3) The permittee shall use apply coatings with VOC contents at or below the allowable emission limitation. [ss. NR 407.09(4)(a)3.b. and NR 422.04(2)(a), Wis. Adm. Code]	(1) Reference Test for Volatile Organic Compound Content: When emission testing of volatile organic compound (VOC) content is required to demonstrate compliance, the permittee shall use USEPA Method 24 or 24A. [ss. NR 407.09(1)(c)1 and NR 439.06(3)(b), Wis. Adm. Code] The permittee shall establish procedures that take reasonable precautions to prevent the spillage, escape or emission of organic compounds from the handling, transportation, storage and disposal of VOC containing materials (e.g., coatings, cleaning agents and contaminated rags). These procedures shall include, but are not limited to, the storage of VOC containing materials in closed/covered containers. [ss. NR 407.09(1)(c)1. and NR 439.04(1)(d), Wis. Adm. Code] The permittee shall keep at least weekly records of the following information sufficient to demonstrate daily compliance: The identity of each coating applied or used (Each material used or applied shall be identified with a unique identification number and/or name). The VOC content of each coating, as applied, in units of pounds per gallon (kilograms per liter), excluding water. The VOC content shall be determined either analytically or using manufacturers literature (e.g., MSDSs). If published literature is used to determine the material's VOC content and the literature specifies a range of values, the permittee shall record and use the worst case value when determining compliance. If published literature is used and the material is compounded or thinned, the permittee shall use a mass balance calculation to determine the material's worst case VOC content. All VOC emissions from solvent washings shall be considered in the emission limitations above unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [ss. NR 407.09(1)(c)1. and NR 439.04(1)(d) and (5)(a), Wis. Adm. Code]	Compliance – The facility uses good operating practices to control VOC emissions in the dip tank area. Containers were closed with no indication of open solvent containers. Kevin Meyer stated that only compliant coatings are used here. VOC & HAP content data was received by email on March 30, 2017, and showed each coating used at this facility was in compliance with the respective 3.5 pounds VOC per gallon coating less water and exempt solvents limitation. The ring bands are typically painted gray. This coating is manufactured by Watson Standard. Only acetone or

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D. Stack S17 (fugitive), Process P37 – Drum Ring Dip Tank, installed in 1972

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
	Wis. Adm. Code]	(4) If cleanup solvents are not directed into containers that prevent evaporation into the atmosphere, the permittee shall determine the amounts used on a daily basis and include the VOC emissions when determining compliance with the emission limitations in Section I.D.1.a.(2). [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]		water is used for a clean-up solvent.

E. Existing Surface Coating Operations (Processes P35, P34 and P37)

National Emission Standards for Hazardous Air Pollutants (NESHAP) - Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]

Condition Type	a. Conditions	Compliance Status
1. Emission Limits Federal Hazardous Air Pollutants (Federal HAPs)	(1) For an existing affected source, you shall limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in (a) to (e), except as specified in Condition 2.a.(4). (a) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg of organic HAP per liter (2.6 lbs./gallon) of coating solids used during each 12-month compliance period. (b) For each existing high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg of organic HAP per liter (27.5 lb/ gallon) of coating solids used during each 12-month compliance period. (c) For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 0.12 kg of organic HAP per liter (1.0 lb/gallon) of coating solids used during each 12-month compliance period. (d) For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 4.5 kg of organic HAP per liter (37.7 lb/gallon) of coating solids used during each 12-month compliance period. (e) For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 1.5 kg of organic HAP per liter (12.4 lb/gallon) of coating solids used during each 12-month compliance period. [s. NR 465.43(1)(b), Wis. Adm. Code; 40 CFR 63.3890(b)]	Compliance – The Hentzen Coatings interior drum coating showed compliance with the 2.6 lbs. Federal HAP per gallon of coating solids. The facility agreed to follow-up this inspection with a listing of all coatings used in 2015 to date and would provide the specific Federal HAP content data for each to demonstrate the facility is operating in compliance with this limitation. VOC & HAP content data was received by email on March 30, 2017, and showed each coating that was used at this facility to be in compliance with the 40 CFR 63 NESHAPS subpart MMMM.

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Existing Surface Coating Operations (Processes P33, P34 and P37) 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)		
Condition Type	a. Conditions:	Compliance Status
. Compliance Options	(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 1.a.(1). To make this determination, you shall use at least one of the compliance options listed in Conditions 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 entire 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 shall document this switch as required by Condition 5.a.(1)(c), and you shall report it in the next semiannual compliance report required in Condition 4. [s. NR 465.43(2), Wis. Adm. Code; 40 CFR 63.3891] (2) Compliant material option. You shall meet all the requirements of s. NR 465.46 to demonstrate compliance with the applicable emission limit in Condition 1.a.(1) using this option. To use this option, you shall demonstrate that the organic HAP content of each coating used in the coating operation or operations is less than or equal to the applicable emission limit in Condition 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)] (3) Emission rate without add-on controls option. You shall meet all the requirements of s. NR 465.47 to demonstrate compliance with the emission limit in Condition 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 operation or operations is less than or equal to the applicable emission limit in Condition 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)] (4) Predominant activity or facility-specific emission limit option. If the surface coating operations are subject to more than one of the subcategory emission limits specified in Condition 1.a.(1), you may comply separately with each subcategory emission limit or comply using one of the alternatives in s. NR 465.43(1)(c)1. or 2. [s. NR 465.43(1)(c), Wis. Adm. Code; 40 CFR 63.3890(c)]	No Evidence of Noncompliance – The facility agreed to follow-up this inspection with a listing of all coatings used in 2015 to date and would provide the specific Federal HAP content data for each to demonstrate the facility is operating in compliance with this limitation. The compliant material option is being used by this facility. VOC & HAP content data was received by email on March 30, 2017, and showed each coating that was used at this facility to be in compliance with the 40 CFR 63 NESHAPS subpart MMMM.

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E. Existing Surface Coating Operations (Processes P33, P34 and P37)		
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]		
Condition Type	a. Conditions	Compliance Status
3. General Compliance Requirements	(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 1.a.(1) at all times. [s. NR 465.44(1)(a)1., Wis. Adm. Code; 40 CFR 63.3900(a)(1)] (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)]	No Evidence of Noncompliance
4. Reports	(1) Semiannual compliance reports. You shall submit semiannual compliance reports for each affected source according to the requirements of (a) to (f). (a) 'Dates.' You shall submit the first and subsequent compliance reports on the dates specified in Condition ZZZ.4.b.(1). (b) 'Inclusion with Title V report.' You shall report all deviations in the semiannual monitoring report required by Condition ZZZ.4.a.(1). If you submit a semiannual compliance report pursuant to this Condition along with, or as part of, the semiannual monitoring report required by Condition ZZZ.4.a.(1), and the semiannual compliance report includes all required information concerning deviations from the emission limit in Condition 1.a.(1), its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report does not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Department. (c) 'General requirements.' The semiannual compliance report shall contain the information specified in (i) to (vii), and the information specified in (d) to (f) that is applicable to your affected source: (i) Company name and address. (ii) Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report. (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. The information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. (iv) Identification of the compliance option or options specified in Condition 2. that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you shall report the beginning and ending dates for each option you used. (v) If you used the emission rate without add-on controls option in Condition 2.a.(3), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. (vi) If you used the predominant activity alternative in Condition 2.a.(4), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report. (vii) If you used the facility-specific emission limit alternative in Condition 2.a.(4), include the calculation of the facility-- specific emission limit for each 12--month compliance period during the 6--month reporting period. (d) 'No deviations.' If there were no deviations from the emission limit in Condition 1.a.(1), the semiannual compliance report shall include a statement that there were no deviations from the emission limits during the reporting period. (e) 'Deviations; compliant material option.' If you used the compliant material option in Condition 2.a.(2), and there	Compliance -- The facility has submitted timely 6 month monitoring reports. The following reports were reviewed during this inspection period: Jan – Jun, 2015 Jul – Dec, 2015 Jan – Jun, 2016 Jul – Dec, 2016 Each monitoring report showed the facility to be operating in continuous compliance with each permit limitation. Included within each report is a compliance certification for 40 CFR 63 subpart MMMM.

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Condition Type	Conditions	Compliance Status
	was a deviation from the applicable organic HAP content requirement in Condition 1.a.(1), the semiannual compliance report shall contain the information in (i) to (iv). (i) Identification of each coating used that deviated from the emission limit in Condition 1.a.(1), and each thinner and other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. (ii) The calculation of the organic HAP content, using Equation 2 of Condition 6.2.(c), for each coating identified in (i). You do not need to submit background data supporting this calculation, such as information provided by coating suppliers or manufacturers, or test reports. (iii) The determination of mass fraction of organic HAP for each thinner and other additive, and cleaning material identified in (i). You do not need to submit background data supporting this calculation, such as information provided by material suppliers or manufacturers, or test reports. (iv) A statement of the cause of each deviation. (f) 'Deviations: emission rate without add-on controls option.' If you used the emission rate without add-on controls option in Condition 2.a.(3) and there was a deviation from the emission limit in Condition 1.a.(1), the semiannual compliance report shall contain the information in (i) to (iii). (i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit in Condition 1.a.(1) (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You shall submit the calculations for Equations 1, 1A to 1C, 2, Condition 7.a.(2); and if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition 7.a.(2)(e)(ii). You do not need to submit background data supporting these calculations, such as information provided by materials suppliers or manufacturers, or test reports. (iii) A statement of the cause of each deviation.	

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E. Existing Surface Coating Operations (Processes P33, P34 and P37)		
National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]		
Condition Type	**a. Conditions**	**Compliance Status**
5. Records	(1) You shall collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard. (a) A copy of each notification and report that you submitted to comply with this subchapter, and the documentation supporting each notification and report. If you are using the predominant activity alternative under Condition 2.a.(4), you shall keep records of the data and calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under Condition 2.a.(4), you shall keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You shall also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports. (b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density or volume fraction of coating solids, you shall keep a copy of the complete test report. If you used information provided to you by the manufacturer or supplier of the material that was based on testing, you shall keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. (c) For each compliance period, the records specified in (i) to (iii): (i) A record of the coating operations on which you used each compliance option in Condition 2. and the time periods, beginning and ending dates and times, for each option you used. (ii) For the compliant material option in Condition 2.a.(2), a record of the calculation of the organic HAP content for each coating, using Equation 2 of Condition 6.a.(2). (iii) For the emission rate without add-on controls option in Condition 2.a.(3), a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and other additives, and cleaning materials used each month using Equations 1 and 1A to 1C and 2 of Condition 7.a.(2) and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition 7.a.(2) (e)(ii); the calculation of the total volume of coating solids used each month using Equation 2 of Condition 7.a.(2); and the calculation of each 12-month organic HAP emission rate using Equation 3 of Condition 7.a.(2). (d) A record of the name and volume of each coating, thinner and other additive, and cleaning material used during each compliance period. If you are using the compliant material option in Condition 2.a.(2) for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used. (e) A record of the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during each compliance period unless the material is tracked by weight. (f) A record of the volume fraction of coating solids for each coating used during each compliance period. (g) If you use the emission rate without add-on controls option in Condition 2.a.(3), the density for each coating, thinner, other additive and cleaning material used during each compliance period. (h) If you use an allowance in Equation 1 of Condition 7.a.(2) for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF)according to Condition 7.a.(2) (e)(ii), you shall keep records of the information specified in (i) to (iii).	No Evidence of Noncompliance - The facility agreed to follow-up this inspection with a listing of all coatings used in 2015 to date and would provide the specific Federal HAP content data for each to demonstrate the facility is operating in compliance with this limitation. VOC & HAP content data was received by email on March 30, 2017, and showed each coating that was used at this facility to be in compliance with the 40 CFR 63 NESHAPS subpart MMMM. The compliant material option is being used by this facility. (The facility was recently acquired by Greif and there is a transition in record keeping and recording at this time.)

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Existing Surface Coating Operations (Processes P33, P34 and P37) 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]		
Condition Type	a. Conditions	Compliance Status
	(i) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of Condition 7.a.(2); a statement of which subparts under 40 CFR parts 262, 264, 265 and 266 apply to the facility; and the date of each shipment. (ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of Condition 7.a.(2). (iii) The methodology used in accordance with Condition 7.a.(2)(e)(ii) to determine the total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. You shall include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring and supporting calculations and documentation, including the waste manifest for each shipment. (i) You shall keep records of the date, time and duration of each deviation. [s. 465.45(3), Wis. Adm. Code; 40 CFR 63.3930] (2) Your records shall be in a form suitable and readily available for expeditious review, according to s. NR 460.09 (2) (a). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. (a) You shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. (b) You shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report or record. You may keep the records off-site for the remaining 3 years. [s. NR 465.45(4), Wis. Adm. Code; 40 CFR 63.3931]	No Evidence of Noncompliance – Some records and SDS documentation were made available during this inspection. As the facility is in the process of revising the record keeping and reporting formats, Geoff Westfall has agreed to follow-up this inspection with a listing of all coatings used in 2015 to date and would provide the specific Federal HAP content data for each to demonstrate the facility is operating in compliance with this limitation. VOC & HAP content data was received by email on March 30, 2017, and showed each coating that was used at this facility to be in compliance with the 40 CFR 63 NESHAPS subpart MMMM. The compliant material option is being used by this facility.

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E. Existing Surface Coating Operations (Processes P33, P34 and P37)		
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]		
Condition Type	a. Conditions	Compliance Status
5. Compliance Requirements for the Compliant Material Option	(1) You shall complete the initial compliance demonstration for the initial compliance period according to the requirements in (2). The initial compliance period begins on January 2, 2007 and ends on the last day of the 12th month following the compliance date. The initial compliance period extends through January, 2007 plus the next 12 months. The initial compliance demonstration includes the calculations according to (2) and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the emission limit in Condition 1.a.(1), and that you used no thinners or other additives, or cleaning materials that contained organic HAP as determined according to (2)(a). [s. NR 465.46(1), Wis. Adm. Code; 40 CFR 63.3940] (2) You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source or for all the coating operations in the affected source. You shall use either the emission rate without add-on controls option in Condition 2.a.(3) for any coating operation in the affected source for which you do not use the compliant material option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations may not use any coating with an organic HAP content that exceeds the emission limit in Condition 1.a.(1) and shall use no thinner or other additive, or cleaning material that contains organic HAP as determined according to (a) to (d). Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in s. NR 465.43 (3) and (4). You shall conduct a separate initial compliance demonstration for each general use, high performance, magnet wire, rubber-to-metal and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit under Condition 2.a.(4). If you are demonstrating compliance with a predominant activity or facility-specific emission limit, you shall demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You shall meet all the requirements of this section. You shall use the procedures in (a) to (d) on each coating, thinner, other additive and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to re-determine the organic HAP content of coatings, thinners, other additives and cleaning materials that are reclaimed on-site, or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site, and reused in the coating operation or operations for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. (a) Determine the mass fraction of organic HAP for each material used. You shall determine the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during the compliance period by using one of the following 5 options: (i) 'Method 311.' You may use Method 311 in 40 CFR part 63, Appendix A, for determining the mass fraction of organic HAP. You shall use the procedures specified in (A) and (B) when performing a Method 311 test. (A) Count each organic HAP that is measured to be present at 0.1% by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. Express the mass fraction of each organic HAP you count as a value truncated to 4 places after the decimal point.	No Evidence of Noncompliance – The initial compliance demonstration determination was made prior to this inspection. The facility is currently using the compliant material option for all coating operations at this facility.

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Existing Surface Coating Operations (Processes P33, P34 and P37)
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]

Condition Type	a. Conditions	Compliance Status
	(B) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to 3 places after the decimal point. (ii) 'Method 24.' For coatings, you may use Method 24 in 40 CFR part 60, Appendix A, to determine the mass fraction of non-aqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in 40 CFR part 63, Subpart PPPP Appendix A, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in 40 CFR part 63, Subpart PPPP, Appendix A as a substitute for the mass fraction of organic HAP. (iii) 'Alternative method.' You may use an alternative test method for determining the mass fraction of organic HAP once the administrator has approved it. You shall follow the procedure in s. NR 460.06 (5) to submit an alternative test method for approval. (iv) 'Information from the supplier or manufacturer of the material.' You may rely on information other than that generated by the test methods specified in (i) to (iii), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction content. If there is a disagreement between the manufacturer's data and results of a test conducted according to (i) to (iii), then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (v) 'Solvent blends.' Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 2 or 3 of ch. NR 465, Subchapter V, Wis. Adm. Code. If you use the tables, you shall use the values in Table 2 for all solvent blends that match Table 2 entries according to the instructions for Table 2, and you may use Table 3 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 2 and you know only whether the blend is aliphatic or aromatic. However, if the results of a test using Method 311 in 40 CFR part 63, Appendix A, indicates higher values than those listed on Table 2 or 3, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (b) Determine the volume fraction of coating solids for each coating. You shall determine the volume fraction of coating solids, in liters (gallons) of coating solids per liter (gallon) of coating, for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in (i) to (iv). If test results obtained according to (i) do not agree with the information obtained under (iii) or (iv), the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (i) ASTM D2697–86 (1998) or ASTM D6093–97 (2003). You may use ASTM D2697–86 (1998) "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings", or ASTM D6093–97 (2003) "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer", to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. (ii) Alternative method' You may use an alternative test method for determining the solids content of each coating once the administrator has approved it. You shall follow the procedure in s. NR 460.06(5) to submit an alternative test method for approval. (iii) Information from the supplier or manufacturer of the material' You may obtain the volume fraction of coating solids for each	No Evidence of Noncompliance – The permittee is using the compliant material option for all coating operations at this facility.

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B. Existing Surface Coating Operations (Processes P33, P34 and P37) National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products (Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMPM)		
Condition Type	**a. Conditions**	**Compliance Status**
	coating from the supplier or manufacturer. (iv) Calculation of volume fraction of coating solids' You may determine the volume fraction of coating solids using the following equation: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$ (Equation 1) where: Vs is the volume fraction of coating solids, liters (gallons) of coating solids per liter (gallon) of coating, mvolatiles is the total volatile matter content of the coating, including HAP, volatile organic compounds, water and exempt compounds, determined according to Method 24 in 40 CFR part 60, Appendix A, grams (lb) of volatile matter per liter (gallon) of coating. Davg is the average density of volatile matter in the coating, grams (lb) of volatile matter per liter (gallon) of volatile matter, determined from test results using ASTM D1475–98 (2003) "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 (2003) test results and other information sources, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (c) Determine the density of each coating. Determine the density of each coating used during the compliance period from test results using ASTM D1475–98 (2003) "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM D1475–98 (2003) test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (d) Determine the organic HAP content of each coating. Calculate the organic HAP content of each coating used during the compliance period using the following equation: $H_c = \frac{(D_c)(W_c)}{V_s}$ (Equation 2) where: Hc is the organic HAP content of the coating, kg (lb) of organic HAP emitted per liter (gallon) of coating solids used. Dc is the density of coating, kg (lb) of coating per liter (gallon) of coating, determined according to (c). Wc is the mass fraction of organic HAP in the coating, kg (lb) of organic HAP per kg (lb) of coating, determined according to (a). Vs is the volume fraction of coating solids, liter (gallon) of coating solids per liter (gallon) of coating, determined according to (b). (e) Compliance demonstration. The calculated organic HAP content for each coating used during the initial compliance period shall be less than or equal to the emission limit in Condition 1.a.(1); and each thinner and other additive, and cleaning material used during the initial compliance period shall contain no organic HAP, determined according to (a). You shall keep all records required by Conditions 5. [s. NR 465.46(2), Wis. Adm. Code; 40 CFR 63.3941] (3)(a) For each compliance period, to demonstrate continuous compliance, you shall use no coating for which the organic HAP	No Evidence of Noncompliance – The permittee is using the compliant material option for all coating operations at this facility.

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Existing Surface Coating Operations (Processes P33, P34 and P37) 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]		
Condition Type	a. Conditions	Compliance Status
	content, determined using Equation 2 of (2)(d), exceeds the emission limit in Condition 1.a.(1), and use no thinner or other additive, or cleaning material that contains organic HAP, determined according to (2)(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in (1), is the end of a compliance period consisting of that month and the preceding 11 months. If you are complying with a facility-specific emission limit under Condition 2.a.(4), you shall also perform the calculation using Equation 1 of s. NR 465.43(1)(c)2. on a monthly basis using the data from the previous 12 months of operation. (b) If you choose to comply with the emission limits in Condition 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 (a) is a deviation from the emission limits in Condition 1.a.(1) that shall be reported as specified in Condition 4.a.(1)(e). (c) As part of each semiannual compliance report required by Condition 4.a.(1), you shall identify the coating operations for which you used the compliant material option. If there were no deviations from the emission limit in Condition 1.a.(1), submit a statement that the coating operations were in compliance with the emission limits during the reporting period because you used no coatings for which the organic HAP content exceeded the emission limit in Condition 1.a.(1), and you used no thinner, other additive or cleaning material that contained organic HAP, determined according to (2)(a). (d) You shall maintain records as specified in Condition 5. [s. NR 465.46(3), Wis. Adm. Code; 40 CFR 63.3942]	No Evidence of Noncompliance – The permittee is using the compliant material option for all coating operations at this facility.

Existing Surface Coating Operations (Processes P33, P34 and P37) 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]		
Condition Type	a. Conditions	Compliance Status
7. Compliance Requirements for the Emission Rate without Add-on Controls Option	(1) You shall complete the initial compliance demonstration for the initial compliance period according to the requirements of (2). The initial compliance period begins on January 2, 2007 and ends on the last day of the 12th month following the compliance date. The initial compliance period extends through the end of that month plus the next 12 months. You shall determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to (2) and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the emission limit in Condition 1.a.(1). [s. NR 465.47(1), Wis. Adm. Code; 40 CFR 63.3950] (2) You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You shall use the compliant material option in Condition 2.a.(2) for any coating operation in the affected source for which you do not use the emission rate without add-on controls option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations shall meet the emission limit in Condition 1.a.(1), but is not required to meet the operating limits or work practice standards in s. NR 465.43 (3) and (4). If you are demonstrating compliance with a predominant activity or facility-specific emission limit, you shall demonstrate that all coating operations included in the predominant activity determination or calculation of the	Compliance/Not Required – Only compliant coatings are used.

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b. Existing Surface Coating Operations (Processes P32, P34 and P37)		
National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]		
Condition Type	a. Conditions	Compliance Status
	facility-specific emission limit comply with that limit. You shall meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners or other additives, or cleaning materials used on coating operations for which you use the compliant material option in Condition 2.a.(2). You do not need to redetermine the mass of organic HAP in coatings, thinners or other additives, or cleaning materials that have been reclaimed on-site, or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site, and reused in the coating operation or operations for which you use the emission rate without add-on controls option. If you use coatings, thinners or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. (a) Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during each month according to the requirements in Condition 6.a.(2)(a). (b) Determine the volume fraction of coating solids. Determine the volume fraction of coating solids, in liters (gallons) of coating solids per liter (gallon) of coating, for each coating used during each month according to the requirements in Condition 6.a.(2)(b). (c) Determine the density of each material. Determine the density of each liquid coating, thinner or other additive, and cleaning material used during each month from test results using ASTM D1475-98 (2003), "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM D5965-02 "Standard Test Methods for Specific Gravity of Coating Powders", or information from the supplier. If there is disagreement between ASTM Method D1475-98 (2003) or ASTM Method D5965-02 test results and other information sources, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C and 2 of this section. (d) Determine the volume of each material used. Determine the volume, in liters or gallons, of each coating, thinner and other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C of this section. (e) Calculate the mass of organic HAP emissions. (i) The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using the following equations and the procedures in (ii) if applicable: Calculate the mass of organic HAP emissions using Equation 1: $H_e = A + B + C - R_w$ (Equation 1) where: He is the total mass of organic HAP emissions during the month, kg (lb). A is the total mass of organic HAP in the coatings used during the month, kg (lb), as calculated in Equation 1A of this section. B is the total mass of organic HAP in the thinners and other additives used during the month, kg (lb), as calculated in Equation 1B of	Compliance/Not Required – Only compliant coatings are used

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Condition Type	a. Conditions	Compliance Status
	this section C is the total mass of organic HAP in the cleaning materials used during the month, kg (lb), as calculated in Equation 1C of this section. Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg (lb), determined according to (ii). You may assign a value of zero to Rw if you do not wish to use this allowance. Calculate the kg (lb) organic HAP in the coatings used during the month using Equation 1A: $A = \sum_{i=1}^{m} (Vol_{c,i})(D_{c,i})(W_{c,i})$ (Equation 1A) where: A is the total mass of organic HAP in the coatings used during the month, in kg (lb). Volc,i is the total volume of coating, i, used during the month, in liters (gallons). Dc,i is the density of coating, i, kg (lb) of coating per liter (gallon) of coating. Wc,i is the mass fraction of organic HAP in coating, i, kg (lb) of organic HAP per kg (lb) of coating. For reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in 40 CFR part 63, Subpart PPPP, Appendix A. m is the number of different coatings used during the month. Calculate the kg (lb) of organic HAP in the thinners and/or other additives used during the month using Equation 1B: $B = \sum_{j=1}^{n} (Vol_{t,j})(D_{t,j})(W_{t,j})$ (Equation 1B) where: B is the total mass of organic HAP in the thinners and other additives used during the month, in kg (lb). Volt,j is the total volume of thinner or other additive, j, used during the month, in liters (gallons). Dt,j is the density of thinner or other additive, j, kg per liter (lb per gallon). Wt,j is the mass fraction of organic HAP in thinner or other additive, j, kg (lb) of organic HAP per kg (lb) of thinner or other additive. For reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in 40 CFR part 63, Subpart PPPP, Appendix A. n = is the number of different thinners and other additives used during the month. Calculate the kg (lb) organic HAP in the cleaning materials used during the month using Equation 1C: $C = \sum_{k=1}^{p} (Vol_{s,k})(D_{s,k})(W_{s,k})$ (Equation 1C) where: C is the total mass of organic HAP in the cleaning materials used during the month, in kg (lb).	Compliance/Not Required -- Only compliant coatings are used.

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E. Existing Surface Coating Operations (Processes P33, P34 and P37)		
National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]		
Condition Type	a. Conditions	Compliance Status
	Vols,k is the total volume of cleaning material, k, used during the month, in liters (gallons). Ds,k is the density of cleaning material, k, kg per liter (lb per gallon). Ws,k is the mass fraction of organic HAP in cleaning material, k, kg (lb) of organic HAP per kg (lb) of material p is the number of different cleaning materials used during the month. (ii) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you shall determine the mass according to (A) to (D): (A) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265 or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater. (B) You shall determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month. (C) Determine the total mass of organic HAP contained in the waste materials specified in (B). (D) You shall document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in Condition 5.a.(1)(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them. (f) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters (gallons), which is the combined volume of coating solids for all the coatings used during each month, using the following equation: $V_{st} = \sum_{i=1}^{m} (Vol_{c,i})(V_{s,i})$ (Equation 2) where: Vst is the total volume of coating solids used during the month, liters (gallons). Volc,i is the total volume of coating i, used during the month, liters (gallons). Vs,i is the volume fraction of coating solids for coating i, liters (gallons) of solids per liter (gallon) of coating, determined according to Condition 6.a.(2)(b) m is the number of coatings used during the month. (g) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period using the following equation: $H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}}$ (Equation 3) where: Hyr is the average organic HAP emission rate for the compliance period, kg (lb) of organic HAP emitted per liter (gallon) of coating solids used.	Compliance/Not Required – Only compliant coatings are used.

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Existing Surface Coating Operations (Processes P33, P34 and P37)

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]

Condition Type	a. Conditions	Compliance Status
	He is the total mass of organic HAP emissions from all materials used during month y, kg (lb), as calculated by Equation 1 of this section. Vst is the total volume of coating solids used during month y, liters (gallons), as calculated by Equation 2 of this section. y is the number of the month in the compliance period. n is the number of full or partial months in the compliance period. For the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13. For all following compliance periods, n equals 12. (h) Compliance demonstration. The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section shall be less than or equal to the emission limit in Condition 1.a.(1). You shall keep all records as required by Condition 5. [s. NR 465.47(2), Wis. Adm. Code; 40 CFR 63.3951] (3)(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to (2)(a) to (g), shall be less than or equal to the emission limit in Condition 1.a.(1). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in (1) is the end of a compliance period consisting of that month and the preceding 11 months. You shall perform the calculations in (2)(a) to (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under Condition 2.a.(4), you shall also perform the calculation using Equation 1 in s. NR 465.43 (1) (c) 2. on a monthly basis using the data from the previous 12 months of operation. (b) If the organic HAP emission rate for any 12-month compliance period exceeded the emission limit in Condition 1.a.(1), this is a deviation from the emission limit for that compliance period and shall be reported as specified in Condition 4.a.(1)(f). (c) As part of each semiannual compliance report required by Condition 4., you shall identify the coating operations for which you used the emission rate without add-on controls option. If there were no deviations from the emission limit in Condition 1.a.(1), you shall submit a statement that the coating operations were in compliance with the emission limits during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the emission limit in Condition 1.a.(1), determined according to (2)(a) to (g). (d) You shall maintain records as specified in Condition 5. [s. NR 465.47(3), Wis. Adm. Code; 40 CFR 63.3952]	Compliance/Not Required – Only compliant coatings are used.

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ZZZ – Conditions Applicable to the Entire Facility.

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	Compliance Status
1. 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 only burn Group 1 virgin fossil fuels (Natural gas, propane, distillate number 2 and diesel fuel oil) when firing any fuel combustion sources. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* (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. 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]*	(1) When 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. and 4(a)1. and NR 439.06(8), Wis. Adm. Code] (2) Recordkeeping and monitoring are not required for any applicable requirement where the facility does not have the potential to violate the emission limitations under normal operating conditions. The facility does not presently have the potential to emit, under normal operation conditions, any State HAP at an emission rate that has been determined to be injurious. [ss. 285.65(3) and 285.63(4)(b), Wis. Stats.]*	Inconclusive/ Further information required. – The Department requested the facility to investigate and quantify HAP emissions from the processing/burning of up to 4 pounds of material per processed drum entering the reclamation furnace. HAPs of interest are lead, mercury, cadmium, barium, chromium, hydrochloric acid, dioxins, and furans. As of the date of this report, the facility has not provided this information. More information is expected as part of the response to US EPA's 114 letter signed March 17, 2017.

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FACILITY REPORTING REQUIREMENTS:

REQUIREMENT	FREQUENCY AND/OR DUE DATE	COMPLIANCE STATUS
Annual Compliance Certification	Annually February 15	Compliance
Semi-Annual Monitoring Report	Semi-annual February 15 and August 15	Compliance
Air Emissions Inventory	Annual March 1	Compliance
40 CFR 63 NESHAPS Subpart MMMM Surface Coating of Miscellaneous Metal Parts and Products	Semi-annually February 15 and August 15	Compliance

RESULTS OF PREVIOUS FCE REPORTS/SITE VISITS:

FCE REPORT DATE	RESULT	COMMENTS
10/08/2008	Noncompliance	Failure to keep accurate inline averaging records, exceedance of the daily RACT emission limitations for surface coating miscellaneous metal parts and products, failure to submit its ch. NR 445 compliance notification, and a late submittal of the facility's operation permit renewal application.
03/15/2011	Noncompliance	Stack S10A is 26.5 feet tall, and stack size is 12.5" x 17.5 (equivalent diameter = 1.215 feet). The stack equivalent diameter is more than permitted limit of 1.08 feet.
06/06/2013	Noncompliance	The facility has not established any standard operating procedure to prevent spillage or emission of organic compounds from the handling, transfer, storage of VOC containing materials. Switched to acetone, an exempt solvent.
04/07/2015 and 04/20/2015	Additional information requested	During this inspection four areas of concern were raised and these are as follows: 1) Formaldehyde emissions from the coating operations 2) Formaldehyde emissions from the paint burn-off 3) VOC control efficiency of the burn-off oven. 4) Record keeping and reporting.

RESULTS OF PREVIOUS EMISSION TESTS:

SOURCE	TEST DATE	POLLUTANT(S)	EMISSION LIMIT	RESULT	COMMENTS
P30, S10 C30 Drum reclamation furnace	11/12/2007	PM	3.3 lbs/hour	2.23 lbs/hour	In compliance
		Visible emissions	20% opacity	5.1% opacity	In compliance
	06/06/2014	PM	3.3 lbs/hr	2.29 lbs/hr	In compliance (bypass disabled)
		VOC	85 % Overall Control Efficiency	98.09 % DE (Assumes 100% Capture Efficiency)	In compliance (bypass disabled)

SUMMARY OF PREVIOUS COMPLAINTS:

COMPLAINT DATE	COMPLAINT DESCRIPTION	FOLLOW-UP ACTION	COMMENTS
Multiple complaints during calendar year 2008	Solvent and a burnt odor	The most common smell was an organic solvent smell. Odor complaints usually correlate with winds coming out of the southeast. The exhaust stacks for the facility's spray booths have rainhats, which have the possibility of affecting the dispersion of the booths' air emissions.	We will continue to randomly check for odors in the neighborhood and respond to any additional complaints.
2014	Odor Complaint	No report detailing follow-up.	Ashok Singh
2016	2 complaints	Visited site for smoke emissions, reviewed afterburner recordings which indicated compliance.	

SUMMARY OF PREVIOUS ENFORCEMENT ACTIONS:

ACTION DATE	ACTION TYPE	NR CODE CITED	RESOLVED [Y/N]	COMMENTS
September 13, 2011	REFERRAL	s. NR 422.15, Wis. Adm. Code and s. 285.66, Wis. Stats.	Yes	Circuit Court Stipulation and Order for Judgment recorded on September 6, 2011, case No. 11-CX-5.
July 1, 2009	NOV			
May, 2004	LON	Permit condition ss. NR 439.03(1)(c) and NR 407.09(4)(a)(3), Wis. Adm. Code.	Yes	LON for not submitting annual compliance certification for the period November 25, 2003, through December 31, 2004.

INSPECTION FIELD NOTES AND DISCUSSION:

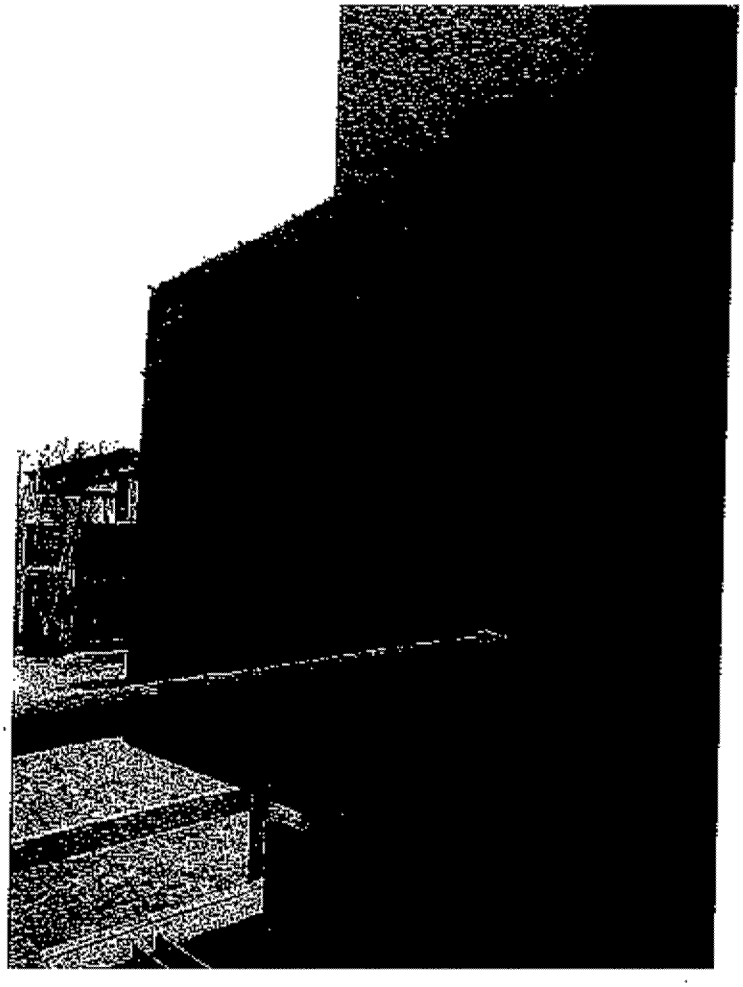
The purpose of this inspection was to determine the facility's compliance status with respect to Wisconsin's air pollution control regulations and the facility's Title V Air Permit. This inspection was coordinated with Mr. Kevin Meyer, Facility Manager of Mid-America Steel Drum. Also present during this inspection was Lauren Laabs of Mostardi Platt. During the inspection, the weather conditions were cloudy with winds from the northeast at 25 miles per hour. The temperature was 40 °F. The inspection started at 10:00 AM. During this inspection, the facility was in operation. While at this facility, I noticed a distinct chemical odor. On a scale of 1 to 10, I identified the intensity to be a 3. The odor was easily discernable to be similar to chemical solvents. There were no odors detected upwind of the facility. Some records were made available for review at the time of the inspection. Additional records and follow-up information was requested by the department both at the inspection and on March 30, 2017, April 11 and 20, 2017 and May 11, 2017. Follow-up information from the company was received by the Department on March 28, and 30, 2017, April 26, 2017, May 12, 15, and 18, 2017.

During this inspection four areas of concern were raised and these are as follows:
1) Modification of PM emission source (shot blasting)
2) Modification of spray painting operations by using filters of lower control efficiency
3) PM and VOC control efficiency of the Drum Reclamation Furnace
4) Follow-up records and emission reporting

Modification of PM emission source (shot blasting)
The facility operates three shot blast units that vent to a baghouse. The shot blast units are believed to be existing sources that date back to the mid 1990's. During the review of the initial operation permit, the shot blast units were identified as an emission source with controlled emissions venting outside. At some point during the review of the initial operation permit 241021220-P01 in 2001, the facility requested that the discharge of the units be changed to venting only indoors. The Department reflected this change in operation in the operation permit and no further review was pursued for a source believed not to be venting to the ambient air. During this inspection, the shot blast units were in operation and a second vent discharging to ambient air was discovered. The second vent is located on the back side of the duct work immediately downstream of the induced draft baghouse fan. To verify emissions are being

vented from this secondary vent, the system must be in operation and a discharge must be witnessed (open louvers). When not in operation, this could easily be overlooked due to its location and apparent closed louvers. Controlled emissions (after the baghouse) were venting to the ambient air during this inspection. I witnessed this in operation during this inspection. This ambient venting is not identified within the operation permit and the source was requested to remedy the situation. Kevin Meyer was able to seal off the vent in the ductwork and provided me with a follow-up email on March 28, 2017, of the completed task. On the following page is Kevin's picture of the sealed bypass vent. During a previous visit, the facility indicated that it was their intent to obtain a construction permit and vent this source outside. A follow-up inquiry was made on March 28, April 11, and 20, and May 11, 2017, to obtain additional information about this emission source and how long venting outside occurred.

The facility provided additional information to the Department relating to the shot blast units on: April 6 and 26, 2017 and May 18, 2017. Based on the data provided by the company, including an air flow rate of 17,000 cfm and a grain loading of 1 grain per cubic foot, the estimated maximum theoretical emissions are : (1 lb/7000 grains)(17,000 ft^3/min)(60 min/hr) = 145 pounds per hour. This process was subject to the requirement to obtain a construction permit under s. NR 406.03(1), Wis. Adm. Code and would not have qualified for a general exemption under s. NR 406.04(2), Wis. Adm. Code. In addition, the facility failed to comply with s. NR 406.10 Wis. Adm. Code.



Picture of sealed bypass vent on baghouse discharge duct work. Picture provided by MASD on March 28, 2017

Modification of spray painting operations (Processes P33 and P34) by using filters of lower control efficiency

Within the permit application for the spray paint operations, the facility presented a minimum control efficiency of 98.7% for particulate matter emissions from the spray painting operations. As the facility reported using particulate filters that are less effective in removing particulate matter, i.e. from 98.7 to 98.38, this translates into a potential increase in emissions. Theoretically, each spray paint discharge could increase to a level that exceeds the permitted limitations in Condition I.C.2.a.(2). Emissions from spray painting operations can be determined using the following equation:

gal/hr * lb solids/gal * (1 – Transfer Efficiency) * (1 – Filtration Efficiency) = Emission Rate (lbs./hr)

To estimate the actual PM emissions for the inside spray painting operation, data from the 2015 air emissions inventory is used. Using the Hentzen Sterilkote® 300 data, the facility averaged 6.9 gal/hr., 3.33 lb solids/gal, 65% transfer efficiency and 98.38% filtration efficiency. The following results are determined:

6.9 gal/hr * 3.33 lb solids/gal * (1 - .65) * (1 - .9838) = <u>0.13 lb PM/hr</u>

The results show that the estimated actual PM emissions from the interior coating operations exceeds the 0.011 lb PM/hr permit limitation (0.008 (limit for S13B (IC Drum))and 0.003 lb (limit for S13A (IC Lid)) PM/hr combined). This concern is also apparent for the exterior coating operations.

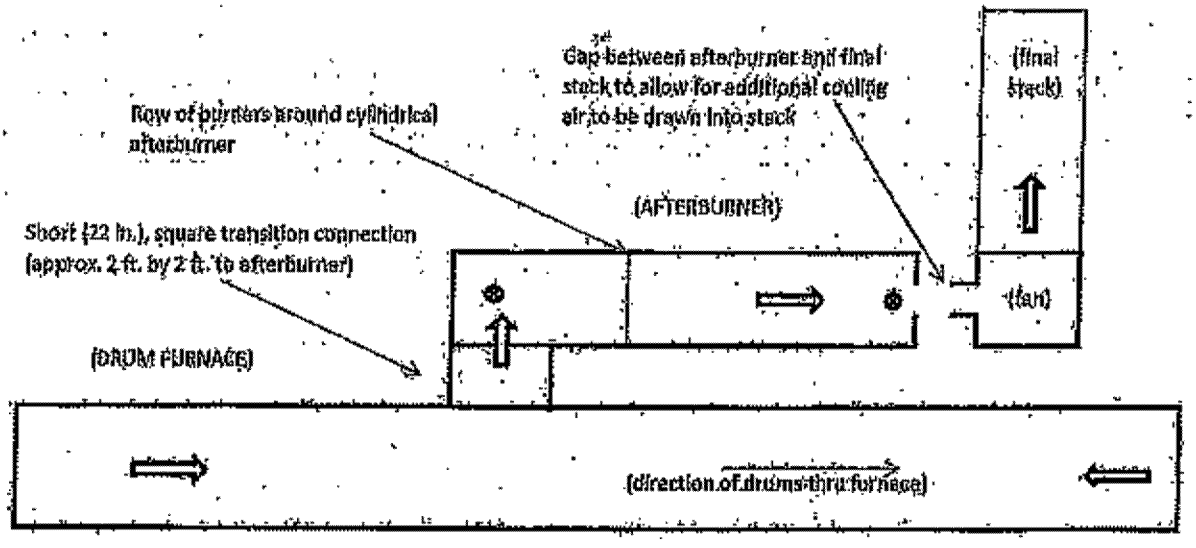
Process Stack	Permit Emission Limit	Theoretical Emission Rate w/98.38 average control efficiency	gal/hr 2015 ARI	solids/gal sds
S13A – IC Lid	0.003 lb/hr	0.13 lb PM/hr	6.9	3.33
S13B – IC Drum	0.008 lb/hr			
S14A – EC Lid	0.008 lb/hr	0.12 lb/hr	9.7	2.2
S14B – EC Drum	0.008 lb/hr			

As calculated above, the interior and exterior particulate matter emissions are in excess of the permitted limits for Process P33 and P34 and noncompliant with air operation permit conditions I. C.2.a.(2) i), ii), iv), and v). The authority for these permit conditions is s. NR 404.08(2), Wis. Adm. Code, relating to protection of ambient air quality.

<u>PM and VOC Control Efficiency of the Drum Reclamation Furnace</u>

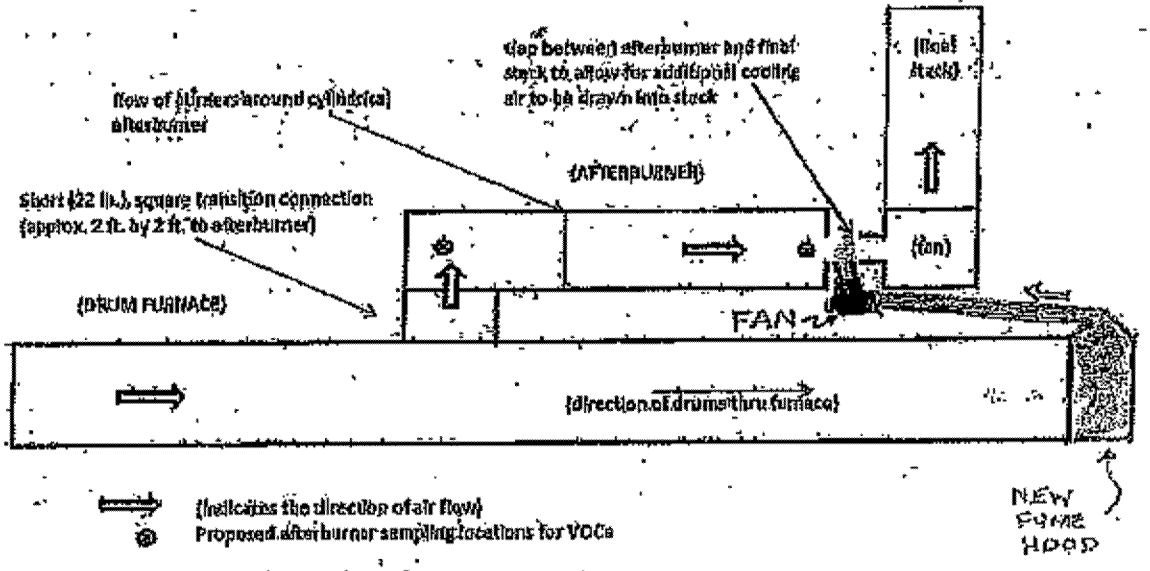
In 2014, Mid-America Steel Drum was requested by US EPA Region V to quantify particulate matter emissions and to quantify the control efficiency of the afterburner. The permittee performed VOC Destruction Efficiency testing using the layout shown below. VOC sample ports are located at the inlet and outlet of the afterburner. The test results show an average of 98% destruction efficiency. During the 2015 inspection, I noted a "new fume hood and vent fan" at the end of the reclamation furnace that draws fumes from the conveyor discharge area and vents these to the ID fan inlet downstream of the afterburner, refer to the modified picture presented below. This system tends to compromise the capture efficiency of the furnace when operating. To determine the overall control efficiency, the additional emissions from this bypass vent needed further quantification.. On May 12, 2017, the facility provided documentation to indicate the bypass system operates at approximately 1200 cfm. The drum reclamation furnace operates at an average of 63,000 cfm. Assuming the emission concentration is homogeneous and dispensed at a 1 to 1 ratio through each route, the overall control efficiency would be conservatively reduced by 4 % for VOCs at a destruction efficiency of 98%. Assuming a 75 % reduction efficiency for PM emissions, the overall control efficiency would be reduced by a conservative estimate of 6%. Both results indicate no evidence of noncompliance on a theoretical basis.

Adjustments to the noted control efficiencies in the air emission inventory are necessary to reflect operation of the bypass vent. For the Drum Reclamation Furnace (P30), the particulate matter capture efficiency will be lowered by the department to 94 % and the VOC capture efficiency will be lowered to 96% as an adjustment to reflect the operation of the bypass blower system, in absence of facility provided values.



(indicates the direction of air flow)
Proposed afterburner sampling locations for VOCs

2014 Stack Test Drawing (By ETE)



(indicates the direction of air flow)
Proposed afterburner sampling locations for VOCs

2015 Operating Layout of Drum Reclamation Furnace, Oxidizer and Bypass Fume Hood

Follow-up Records Required by the Permit:

Federal HAP Emissions Records

The facility maintains much of the necessary documentation as required by the permit. The facility did not have the federal HAP emissions data available for review during this inspection as required under Part 1.E.5. a.(1) and (2). The facility was recently acquired by Greif and there is a transition in record keeping and recording at this time. We reviewed some of the available records and the company agreed to submit some additional records after the inspection (VOC HAP content data). This data was received by email on March 30, 2017, and showed each coating that was used at this facility to be in compliance with the 40 CFR 63 NESHAPS subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products, and the respective 3.5 pounds VOC per gallon coating less water and exempt solvents.

Spray Paint Records

The spray paint filter maintenance records were reviewed. Records for each month were present and indicated the facility is replacing each spray paint booth filter. For the months of January, May, June July, August, September, October, November and December 2016, the operator failed to initial the daily activity. This indicates noncompliance with the air permit whereby the operator is to record and initial the daily inspection and filter replacement. Failure to maintain the required documentation may be considered operating in noncompliance with permit condition 2410221220-P12 condition I.C.2.a.3 and ss. NR 407.09(1)(c)1., NR 439.04(1)(a) & (d) and NR 439.055(2)(b), Wis. Adm. Code.

Air Emissions Inventory

We reviewed the air emissions inventory report and comparing the values to the facility throughput and emission records. Some of the throughput data did not match the operational records. The facility agreed to review and correct apparent errors. I also mentioned that the barrel reclamation furnace emissions will need to include emissions from the processing of combustible materials. The furnace is designed to process up to 4 pounds of material with each drum and this throughput is not identified on the current inventory. Next, with the addition of the discharge venting, the capture efficiency of the furnace will need to be lowered to reflect actual operating conditions. For the air emission inventory reporting, the facility will need to identify an estimated capture efficiency for PM and VOC for process P30. Emission factor data for PM and VOC will need to be included for this process and emissions shall be reported for 2016. The 2016 Air Emissions Inventory was updated to reflect the current coating throughput values as shared during this inspection. In addition the PM and VOC values from the 2014 stack test were inserted under the Drum Reclamation Furnace (P30). The facility submitted their draft air emission inventory report on May 23, 2017, for department processing. For the Drum Reclamation Furnace (P30), the particulate matter capture efficiency will be lowered by the department to 94 % and the VOC capture efficiency will be lowered to 96% as an adjustment to reflect the operation of the bypass blower system, in absence of facility provided values.

Hazardous Air Pollutant Emissions from the Drum Residues

HAP data for the processing of various drummed residues is also absent. Hazardous air pollutant (HAP) emissions from the Drum Reclamation Furnace may be significant but there is insufficient data currently available to accurately characterize these emissions. To address emissions from drum reclamation furnaces and other types of solid waste combustion units, Congress added Section 129 to the Clean Air Act of 1990. The Industrial Combustion Coordinated Rulemaking (ICCR) Federal Advisory Committee (ICCR Coordinating Committee) was formed to make recommendations to the Environmental Protection Agency (EPA) for consideration in the implementation of Section 129 of the Clean Air Act. In May 1998 the Incinerator Work Group Subteam of the ICCR Coordinating Committee searched the EPA ICCR Emissions Database, trade group records, EPA technical documents, State agency records, and State air permits that specify emission limits and could find only very limited test data to accurately characterize drum reclaimer furnaces. As a result, the Subteam proposed to test three drum reclamation furnaces for all Section 129 pollutants. This recommendation for stack testing was forwarded to EPA by the ICCR Coordinating Committee in August 1998. The results of these tests are not available to date. The Section 129 HAPs of interest are lead, mercury, cadmium, hydrochloric acid, dioxins, and furans. In addition to these federal HAPs, barium and chromium (state HAPs) should also be quantified from this source. The compliance status in this area is inconclusive as the source has not provided this data as of the time of this report.

RECOMMENDATIONS/CONCLUSIONS:

The facility has noted areas of noncompliance that should be dealt with through the enforcement process. In addition, the facility will need to provide additional information before the compliance status of all requirements can be determined and take corrective actions where identified. In addition, it is recommended that the facility should be requested to stack test the drum reclamation furnace for PM and VOC emissions using the current operating practices, i.e. that the bypass venting system is operated to obtain actual emission values. This facility should be inspected during FY 2018-2019.

SAFETY EQUIPMENT REQUIRED TO GAIN ACCESS TO SITE:

- ■ HEARING PROTECTION
- ■ HARD HAT
- ■ SAFETY GLASSES
- ■ SAFETY SHOES
- ☐ OTHER (please list)

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
SOUTHEAST REGION
FULL AIR COMPLIANCE EVALUATION (FCE) SUMMARY

FID: 241063570	**FCE/SITE VISIT DATE:** March 27, 2017 ☒ EPA Committed FCE ☐ Uncommitted FCE **Announced Inspection** ☒ Yes ☐ No
FACILITY NAME AND LOCATION: Mid-America Steel Drum Co/Kitzinger 2529 East Norwich Ave. St. Francis, WI. 53235	**EPA CLASS TYPE:** A – Major Source
COUNTY: MILWAUKEE	**SIC AND NAICS CODES AND DESCRIPTIONS:** SIC: 3324 Metal working NAICS: 332443 Metal can, box and other metal container manufacturing
INSPECTION PARTICIPANTS: Mark Furgason – CLCM Mid America Steel Drum Amy Litcher – SAGA Environmental Dan Hellenberg – WDNR Mike Griffin - WDNR	**APPLICABLE AIR PROGRAMS:**

Prog./Pmt. Code:			
NR 445	☒	P63 NESHAP MACT	☐
PSD	☐	P63 NESHAP GACT	☐
NAA	☐	P64 CAM	☐
P60 NSPS	☐	P75 CBM	☐
P61 NESHAP	☐	P76 ACID RAIN	☐
P62 NESHAP MACT	☒		

Credentials Shown: ☒ Yes ☐ No

TOTAL REPORTED ACTUAL FACILITY EMISSIONS IN TONS/YEAR*:

	PM	SO_2	NO_x	VOC	CO	PM10	HAP
2016	Production ceased, below reporting thresholds						
2015	Production ceased, below reporting thresholds						
2014	-	-	-	-	-	-	9
2013	-	-	-	29.7	-	-	12
Class Code	B	B	B	A	B	B	A
Attainment Status	Att.	Att.	Att.	Att.	Att.	Att.	Major

*Emission data above is from the emission inventory.

IS FACILITY IN COMPLIANCE WITH ALL WISCONSIN AIR REGULATIONS?

☒ Yes* ☐ No ☐ **Additional Information Is Needed Before This Determination Can Be Made.**

*NOTE: The compliance determination is for this location only.

Are permit revisions needed? ☒ Yes ☐ No (Facility is relocating processes to Pennsylvania location.)

INSPECTOR SIGNATURE: Michael Griffin **SIGNATURE DATE:** 5/31/2017
TITLE: Air Management Engineer

SUPERVISOR SIGNATURE: Kendra Fisher **SIGNATURE DATE:** 6/1/2017
TITLE: Supervisor

Cc: Bureau of Air Management - Compliance, AM/7
Facility

FACILITY INFORMATION

FACILITY CONTACT:	FACILITY CONTACT PHONE/EMAIL:
Mike Higgins – General Manager	(414) 762-1114 // mhiggins@masdinc.com
Mark Furgason – Facility Manager	(414) 483-8801// mfurgason@masdinc.com

FACILITY AIR PROGRAMS:

Air Program	Subpart	Citation
NESHAP	40 CFR part 63, Subpart MMMM	National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products

FACILITY DESCRIPTION:

The facility is located in the City of St. Francis, Milwaukee County. The surrounding area is commercial and residential. Milwaukee County is designated as attainment for all primary air pollutants. The facility has two locations, the Mid-America Steel Drum Co/Kitzinger Norwich Avenue Site (Norwich) and the Mid-America Steel Drum – CLCM Pennsylvania Avenue Site (Pennsylvania). Since 2014, many of the processes at this facility (Norwich) have either shut down or have been relocated to the adjacent production facility (Pennsylvania). The Norwich facility is currently used as a storage/warehouse for containers and drums for Mid-America Steel Drum - CLCM.

HISTORY:

The Norwich facility was refurbishing (reconditioning) used steel drums since 1947, before there was an air program (1969). That facility was known as Kitzinger Cooperage Company. In the mid-1990s, the company footprint expanded by purchasing a company adjacent to nearby building, located on corner of Norwich Avenue and Pennsylvania Avenue, and a drum reclamation business located in West Allis called National Container Recycling. In 1995, Kitzinger Cooperage Company relocated the operations from the National Container Recycling facility to the newly purchased building. The new building is known as the Pennsylvania Avenue Site (FID 341158070). Because of their close proximity, common ownership, and similar operations, the two sites are considered the same facility. Kitzinger Cooperage Company was purchased by one of their main competitors, Mid-America Steel Drum Company, in August, 2011. The facility became known as Mid-America Steel Drum Co./Kitzinger. (Mid-America Steel Drum Co. has an original plant in Oak Creek that is still operated under FID number 241021220.)

Mid-America Steel Drum Co./Kitzinger reconditions used (empty) containers, including pails, metal drums, and plastic drums. The pails and drums processed can range in size from 5 to 55 gallons. The containers can be either plastic or metal, depending upon their original use and the materials formerly stored (mostly industrial solvents, resins, or coatings). Plastic totes, which are large liquid storage containers, are no longer reconditioned at the facility.

POINT/PROCESS DESCRIPTION:

Description of processes at Norwich Avenue plant (processing ceased in 2015):

1. Process B20, Stack S08 (Process heat boiler -)
Stack S08, Process B20 - Cleaver Brooks 100 HP Boiler: The boiler, installed in 1969, is natural gas-fired with a rated heat input capacity of 5.2 MMBtu/hr. The boiler was damaged, but not destroyed, by the fire in 2005. Its electrical control panel was rebuilt. The boiler appears to have been shut down and abandoned in place. The boiler is owned by 17H LLC and additional details are unknown at this time.

2. Process P30, Stack S10, Control C10 (Reclamation furnace – shutdown and abandoned in place)
Drum Reclamation Furnace with Afterburner: The unit, installed in June of 1976, consists of a conveyor belt, combustion chamber, and afterburner. The combustion chamber and afterburner are both natural gas-fired. This process appears to have been abandoned in place and looks inoperable. The reclamation furnace is owned by 17H LLC and additional details are unknown at this time.

3. Process P31, Stack S11, Control C11 (Two shot blasters – Processes removed from this location):
Process P31 was associated with two units which vent outside the building. The shot blast units are used to remove ash and char from open top metal drums prior to spray painting. The shot blast units have been removed from this site. The units are/were owned by 17H LLC and additional details are unknown at this time.

4. Process P32, Stack S12, Control C32 (Internal Drum Paint Spray Booth), Process P32A, Stack S12A, Control C32A (Internal Lid Lining Paint Spray Booth), Process P32B, Stack S12B (Curing oven associated with processes P32 and P32A), Process P32C, Stack S12C, Control 32C (Auto External Paint Spray Booth), Process P35, Stack S13, Control C35 (Manual External Spray Booth), Process P32D, Stack S55 (Curing oven associated with P32C and P35), Process P36A, Stack S14, Control C14 (New Drum Lid Spray Booth), Process P36B, Stack S56 (Curing Oven associated with P36A) (Processes removed from this location):
This paint line was installed in 2005 and used water based coatings. All these processes have been removed from the facility. Process 32B (Curing oven associated with processes P32 and P32A) and Process P32C, Cntrol C32C (Auto External Paint Spray Booth) were moved to the CLCM Pennsylvania facility in December 2014. The remaining processes are/were owned by 17H LLC and additional details are unknown at this time.

5. Processes P50A, Stack S50 (Caustic Drum Pre-flush), Process P50B, Stack S51 (Caustic Wash), and Process P50C, Stack S53 (Drying oven, 0.6 MMBtu/hr) (Processes removed from this location):
Closed top steel drums were cleaned before painting. The process consisted of caustic pre-flush, hot caustic wash holding tank and a natural gas fired dryer. This process has been removed from this location. The removed processes are/were owned by 17H LLC and additional details are unknown at this time.

6. Process 60A, Stack S57 (New Drum/Lid Caustic Washer Hot Bath), Process P60B, Stack S58 (New Drum/Lid Dryer, 1 MMBtu/hr) (Processes removed from this location):
New manufactured drums and lids were received unpainted to supplement the need for additional drums. The drums were cleaned in a hot KOH bath(P60A), rinsed, dried (P60B) and painted (P36A). This process has been removed from this location. The removed processes are/were owned by 17H LLC and additional details are unknown at this time.

7. Process S65, Stack S65 (Drum Lid Dip Tank)(Process removed from this location):
Seal rings, which are used to attach the lids to the open top drums, were stacked on a hook and coated by dipping them into a 75 gallon paint bath. This process has been removed from this location. The removed processes are/were owned by 17H LLC and additional details are unknown at this time.

8. Process P44, Fugitive F44, Drum Label Stripping (Process removed from this location):
Labels were manually removed from the drum exterior using a brush-on stripping compound which contained methylene chloride. This process was removed from this location and is identified as the process for Label Stripping at the CLCM Pennsylvania facility.

PERMIT(S) ISSUED:

Permit No.	Issue Date	Purpose of Permit	Expiration Date
241063570-P10	November 30, 2010	Renewal of operation permit	May 31, 2015
241063570-P11	October 24, 2012	Revision of permit number 241063570-P10	May 31, 2015
241063570-P12	December 18, 2008	Revised Operation Permit	November 30, 2015
241063570-P13	April 24, 2014	Revision request Reissued under 341158070-F01/ 14-RSG-142	October 24, 2015

COMPLIANCE SUMMARY

A. Process B20, Stack S08 – Cleaver Brooks 100 HP Boiler				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 0.04 pounds per hour from stack S08. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) For any boiler which has a maximum heat input that is greater than one million Btu per hour, the permittee may not cause, allow, or permit particulate matter emissions from the stack of such a boiler to exceed E pounds of particulate matter emissions per million Btu heat input, where E = 0.3 0.0006 I and I = total maximum heat input for a given boiler in millions of Btu per hour. [s. NR 415.06(1)(c)1., Wis. Adm. Code {Permit 08-RSG-053}]	(1) The permittee shall only fire natural gas in the boiler.[ss. 285.65(7) Stats., and NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever a stack test for particulate matter emissions is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another 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 08-RSG-053}] (2) The permittee shall keep monthly records of the types of all fuels burned in the boiler. [s. NR 439.04(1)(d), Wis. Adm. Code {Permit 08-RSG-053}]	This process heater has been shut down since November of 2013.
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.04(2),Wis. Adm. Code {Permit 08-RSG-053}] (2) Notwithstanding condition (1) above, when the boiler is being cleaned or a new fire started, emissions may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80 % opacity for 6 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day (see note). [ss. NR 431.04(2) and NR 431.05(1), Wis. Adm. Code {Permit 08-RSG-053}] Note: "Combustion equipment may not be	(1) The compliance demonstration requirement 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 08-RSG-053}]	(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 {Permit 08-RSG-053}] (2) The recordkeeping requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.

A. Process B20, Stack S08 — Cleaver Brooks 100 HP Boiler				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	cleaned nor a fire started more than 3 times per day" means the above exemption is available only up to 3 cleanings or fires started per day. (3) Notwithstanding condition (1) above, emissions may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, or other good cause, provided no hazard or unsafe conditions arises. [ss. NR 431.04(2) and NR 431.05(2), Wis. Adm. Code {Permit 08-RSG-053}]			
3. Nitrogen Oxides Emissions	(1) The boiler may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that the boiler did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.A.3.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.
4. Federal HAPs	(1) The permittee shall meet the applicable limitations in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats. {2410633570-P12}]	(1) The permittee shall comply with the applicable compliance demonstration requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {2410633570-P12}]	(1) The permittee shall meet the applicable recordkeeping and monitoring requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {2410633570-P12}]	See above.

B. Process P30, Control Device C10 (afterburner), Stack S10 – Reclamation Furnace				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 5.0 pounds per hour from stack S10. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Only natural gas shall be used as combustion fuel. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] (2) The afterburner shall be operated at all times the reclamation furnace is in operation. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] (3) The operating temperature of the afterburner shall be at least 1800 °F, unless the Department approves, in writing, a different minimum temperature. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	(1) Whenever a stack test for particulate matter emissions is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another 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 08-RSG-053}] (2) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {08-RSG-053}] (3) The permittee shall install, operate, calibrate, and maintain the monitor(s) necessary to measure the afterburner temperature. [ss. NR 439.055(1),(4), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) The temperature monitoring device shall have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or ± 5 °F of the temperature being measured, or the equivalent in degrees Celsius (centigrade), whichever is greater. [ss. NR 439.055(3)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (5) The afterburner temperature shall be monitored and recorded at least once every 15 minutes. [ss. NR 439.055(2)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	This process was shut down in November of 2013. The furnace remains on site and appears to be abandoned in place.
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(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 08-RSG-053}]	(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 {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.
3. VOC	(1) 85% control of VOC. [s. NR 424.03(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method	(1) Whenever emission testing is required to demonstrate compliance, the permittee shall use Method 18 in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04, or another test method approved by the Department in writing. [ss. NR 439.06(3)(a), and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-	See above.

B. Process P30, Control Device C10 (afterburner), Stack S10 – Reclamation furnace				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		for volatile organic compounds. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for volatile organic compounds. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	
4. NOx Emissions	(1) The process P30 may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that the process P30 did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.B.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.

C. Process P31, Control Device C11 (Baghouse), Stack S11 – Shot Blasting (2 emission units)				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 1.0 pounds per hour from stack S11. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) The process P31 may not operate for more than 80 hours during any week. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) The permittee shall use a baghouse to control particulate matter emissions from the process P31. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] (2) The permittee shall install, operate, and maintain a device to monitor the pressure drop across the baghouse. [ss. NR 439.055(1)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall perform an internal inspection of the baghouse once every calendar year to ensure that the control equipment is operating properly. The time interval between inspections may not be closer than 6 months. These inspections shall include, but not be	(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 emissions (U.S. EPA Method 202) or another 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 08-RSG-053}] (2) The permittee shall monitor and record the pressure drop across the baghouse every 8 hours of source (P31) operation, or once per day, whichever yields the greater number of measurements. [ss. NR 439.055(2)(b)1., and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep records of all inspections, checks and any maintenance (including bag replacement) or repair performed on the baghouse. The records shall include the date of the action and a description of any corrective actions taken. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) The permittee shall keep weekly records of operating hours of P31. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	This process was removed from this facility in 2014.

C. Process P31, Control Device C31 (Baghouse), Stack S11 — Shot Blasting (2 emission units)				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		limited to inspections and maintenance/ repair (as necessary) of: (a) valves, hatches, dampers, and gaskets for signs of air infiltration; and (b) bag condition, tension, and signs of clean side dust deposits. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]		
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, compliance with the visible emissions limit shall be determined by 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 {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.

D. Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth; Process P32A, Control Device C32A (Fabric Filter), Stack S12A — Internal Drill Lining Spray Booth; Process P32B, Stack S12B — Curing Oven; Process P32C, Control Device C32C (Fabric filter), Stack S12C — Auto External Drum Spray Booth; Process P35, Control Device C35 (Fabric filter), Stack S13 — Manual External Spray Booth; Process P32D, Stack S55 — Curing Oven; Process P36A, Control Device C14 (Fabric filter), Stack S14 — New Drum Lid Spray Booth; Process P36B, Stack S56 — Curing Oven [Norwich Site]				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed the following: (a) 0.13 pounds per hour from stack S12. (b) 0.05 pounds per hour from stack S12A. (c) 0.02 pounds per hour from stack S12B. (d) 0.145 pounds per hour from stack S12C. (e) 0.19 pounds per hour from stack S13. (f) 0.01 pounds per hour from stack S55.	(1)(a) For each of the spray booths, dry filter(s) shall be in place to control particulate matter emissions whenever the process is in operation (i.e. during spray operation). (b) The dry filters used in process P32C shall have a particulate matter control efficiency of at least 99%.	(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 emissions (U.S. EPA Method 202) or another 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 08-RSG-053}] (2) The permittee shall monitor and record the pressure drop across the filter(s) every 8 hours when the associated process is in operation.	This process was discontinued in November of 2013.

D. Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth. Process P32A, Control Device C32A (Fabric filter), Stack S12A — Internal Lid Lining Spray Booth. Process P32B, Stack S12B — Curing Oven. Process P32C, Control Device C32C (Fabric Filter), Stack S12C — Auto External Drum Spray Booth. Process P35, Control Device C35 (Fabric filter), Stack S13 — Manual External Spray Booth. Process P32D, Stack S55 — Curing Oven. Process P36A, Control Device C14 (Fabric filter), Stack S14 — New Drum Lid Spray Booth. Process P36B, Stack S56 — Curing Oven. [Norwich Site]				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	(g) 0.14 pounds per hour from stack S14. (h) 0.01 pounds per hour from stack S56. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(c) The dry filters used in processes P32, P32A, P35, and P36A shall have a particulate matter control efficiency of at least 98%. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) Only natural gas shall be combusted in the curing ovens (P32B, P32D, and P36B). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall install, operate, and maintain a device to monitor the pressure drop across each filter. [ss. NR 439.055(1)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4)(a) The pressure drop across each filter in operation shall be maintained within the range recommended by the manufacturer. (b) The permittee shall keep records (e.g. manufacturer's specifications) that indicate the manufacturer recommended pressure drop range for type of filter used in each paint booth. (c) The operating filter pressure drop range for each paint	[ss. NR 439.055(2)(b)1., and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep daily records of filter inspections. The permittee shall also keep records of filter replacements including date(s) of replacement for each paint booth process. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4)(a) The permittee shall maintain records that indicate the particulate matter control efficiency of the filters used in P32C. (b) The permittee shall maintain records that indicate the particulate matter control efficiency of the filters used in P32, P32A, P35, and P36A. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	

D. Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth; Process P32A, Control Device C32A (Fabric Filter), Stack S12A — Internal Lid Lining Spray Booth; Process P32B, Stack S12B — Curing Oven; Process P32C, Control Device C32C (Fabric filter), Stack S12C — Auto External Drum Spray Booth; Process P35, Control Device C35 (Fabric filter), Stack S13 — Manual External Spray Booth; Process P32D, Stack S55 — Curing Oven; Process P36A, Control Device C14 (Fabric filter), Stack S14 — New Drum Lid Spray Booth; Process P36B, Stack S56 — Curing Oven. [Norwich Site]				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		booth shall be included in the facility's malfunction prevention and abatement plan. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (5) The permittee shall perform daily inspections of the filters (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 08-RSG-053}]		
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(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 08-RSG-053}]	(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 {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	See above.
3. Volatile Organic Compounds	(1) The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [s. NR 422.15(3)(c), Wis. Adm. Code {Permit 08-RSG-053}] (2) Emissions may not exceed 3.5 pounds VOC	(1) The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee may use USEPA Method 24 results,	(1) Whenever the organic solvent content, the volume of solids, the weight of solids, the water content and the density of surface coatings is required to demonstrate compliance, the permittee shall use U.S. EPA Method 24 or 24A or another test method approved by the Department in writing. [ss. NR 439.06(3)(b), and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall have available the following records on a daily basis for each coating formulation used:	This process was discontinued in November of 2013.

D. Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth; Process P32A, Control Device C32A (Fabric filter), Stack S12A — Internal Lid Lining Spray Booth; Process P32B, Stack S12B — Curing Oven; Process P32C, Control Device C32C (Fabric Filter), Stack S12C — Auto Exterior Drum Spray Booth;
Process P35, Control Device C35 (Fabric filter), Stack S18 — Manual Exterior Spray Booth; Process P32D, Stack S95 — Curing Oven; Process P36A, Control Device C14 (Fabric filter), Stack S19 — New Drum Lid Spray Booth; Process P36B, Stack S56 — Curing Oven. [Norwich Site]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	per gallon of coating applied, excluding water, for extreme performance cured coatings delivered to an applicator. [s. NR 422.15(2)(b), Wis. Adm. Code {Permit 08-RSG-053}] (3) Permittee may use (facility-wide aggregate)* up to 55 gallons of non-compliant coatings during any 12 consecutive month period. [s. NR 422.03(7), Wis. Adm. Code {Permit 08-RSG-053}] * Includes any non-compliant coatings used in processes P65 and P43A (4) All VOC emissions from solvent washings shall be considered in the emissions limitations in I.D.3.a.(1),(2) unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8), Wis. Adm. Code {Permit 08-RSG-053}]	Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, thinner and cleanup solvent, to demonstrate compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (3) 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	(a) A unique name or identification number of coating, as applied; (b) A unique name or identification and volume of clean-up solvent used, but not directed into a closed container (if any); (c) The VOC content of coating, as applied in units of pounds VOC per gallon, excluding water (clean-up solvents used that are not directed into a closed container shall be included in this computation). [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep the following monthly records: (a) The VOC content (in pounds per gallon) and quantity (in gallons) of each compliant coating and noncompliant coating applied during the month; (b) The quantity (in gallons) and VOC content (in pounds per gallon) of each cleanup solvent used during the month; (c) Amount of VOC emitted from processes P32, P32A, P32C, P35, and P36A combined, in pounds per month. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) If non-compliant coatings are used at the facility, the permittee shall keep the following records on a monthly basis: (a) A unique name or identification number for each non-compliant coating applied; (b) The volume of each non-compliant coating applied during the month; (c) The aggregate volume of all non-compliant coatings applied during the month (including any non-compliant coatings used in processes P65 and P43A); and (d) The aggregate volume of all non-compliant coatings applied (including any non-compliant coatings used in processes P65 and P43A) during the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR	

D. Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth, Process P32A, Control Device C32A (Fabric filter), Stack S12A — Internal Lid Lining Spray Booth, Process P32B, Stack S12B — Curing Oven, Process P32C, Control Device C32C (Fabric filter), Stack S12C — Auto/External Drum Spray Booth, Process P35, Control Device C35 (Fabric filter), Stack S14 — Manual External Spray Booth, Process P32D, Stack S55 — Curing Oven, Process P36A, Control Device C14 (Fabric filter), Stack S14 — New Drum Lid Spray Booth, Process P36B, Stack S56 — Curing Oven - [Norwich Site]				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		gallons, excluding water; VOCt = the VOC content of the thinner as received, in pounds per gallon, excluding water; Qt = the amount of thinner added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	
4. Federal HAPs	(1) The permittee shall meet all applicable requirements in section I.N (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 08-RSG-053}] Note: Steel drum/Lid coating operations at the facility are part of the general use coating affected source that is subject to National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	(1) The permittee shall comply with all applicable compliance demonstration requirements in section I.N (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 08-RSG-053}]	(1) The permittee shall meet all applicable requirements in section I.N (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 08-RSG-053}]	See above.
5. NOx	(1) Each of the curing ovens (processes P32B, P32D, and P36B) may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that each of the processes P32B, P32D, and P36B did not operate for more than 100 hours per week, [s. 285.65(3), Wis. Stats., s. NR	(1) Permittee shall keep records required in condition I.D.5.b.(1), [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.

D. Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth. Process P32A, Control Device C32A (Fabric filter), Stack S12A — Internal Lid Lining Spray Booth. Process P32B, Stack S12B — Curing Oven. Process P32C, Control Device C32C (Fabric Filter), Stack S12C — Auto External Drum Spray Booth. Process P35, Control Device C35 (Fabric filter), Stack S13 — Manual External Spray Booth. Process P32D, Stack S55 — Curing Oven. Process P36A, Control Device C36A (Fabric filter), Stack S14 — New Drum Lid Spray Booth. Process P36B, Stack S56 — Curing Oven. [Norwich Site]				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
		407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]		

E. Process P50A, Stack S50 — Caustic Drum Preflush. Process P50B, Stack S51 — Caustic Drum Wash. Process P50C, Stack S53 — Closed Drum Drying Oven. (Norwich site)				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Sodium Hydroxide (NaOH).	(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 08-RSG-053}]	(1) Permittee may not use caustic solutions that exceed 10% NaOH (by weight) in processes P50A and P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2)(a) Process P50B (drum exterior washing) may not use spray techniques. (b) Permittee shall take measures to minimize any splashing in process P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(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 document and maintain a record of the percentage (or percentage range) of NaOH (by weight) in the caustic solutions used in processes P50A and P50B. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	This process was discontinued in November of 2014.
2. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 0.01 pounds per hour from stack S53. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) No person may cause, allow or permit	(1) Only natural gas shall be combusted in the drying oven (P50C). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2)(a) Process P50B (drum exterior washing) may not use spray techniques. (b) Permittee shall take measures to	(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 emissions (U.S. EPA Method 202) or another 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 08-RSG-053}] (2) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {08-RSG-053}]	See above.

B. Process P50A, Stack S50 – Caustic Drum Preflush, Process P50B, Stack S51 – Caustic Drum Wash, Process P50C, Stack S52 – Closed Drum Drying Oven. (Norwich site)				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard or creates air pollution. [s. NR 415.03, Wis. Adm. Code {Permit 08-RSG-053}]	minimize any splashing in process P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]		
3. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(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 08-RSG-053}]	(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. [ss. NR 407.09(1)(c)1.a. and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	See above.
4. NOx	(1) The process P50C may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that the process P50C did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.E.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.

I. Process P60A, Stack S57 – New Drum/Lid Washer/Hot Bath; Process P60B, Stack S58 – New Drum/Lid Dryer (Norwich site)				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed the following: (a) 0.01 pounds per hour from stack S57. (b) 0.01 pounds per hour from stack S58. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Only natural gas shall be combusted in the hot water heater (in P60A) or in the dryer (P60B). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(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 emissions (U.S. EPA Method 202) or another 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 08-RSG-053}] (2) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]	This process was discontinued in November of 2014.
2. Visible Emissions	1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(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 08-RSG-053}]	(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 {Permit 08-RSG-053}] (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]	See above.
3. NOx	(1) The processes P60A, P60B may not operate for more than 100 hours during any week. [s. NR 404.08(2),Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that each of the processes P60A, P60B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.F.3.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.

I.G. Process P65, Stack S65 – Drum and Clump Dip Tank				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. VOC	(1) The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [s. NR 422.15(3)(c), Wis. Adm. Code {Permit 08-RSG-053}] (2) Permittee may use (facility-wide aggregate)* up to 55 gallons of non-compliant coatings during any 12 consecutive month period. [s. NR 422.03(7), Wis. Adm. Code.] * Includes any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P43A (3) All VOC emissions from solvent washings shall be considered in the emissions limitation in I.G.1.a.(1), unless the used wash solvent is directed into containers that prevent evaporation into	(1) The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, and thinner, to demonstrate compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (3) If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to the dip tank (coating applicator) as follows: $VOCa = [(VOCc \times Qc) + (VOCt \times Qt)]/(Qc + Qt)$ where: VOCa = the VOC content of the coating as delivered to the dip tank, in pounds per gallon excluding water; VOCc = the VOC content of the coating as received, in pounds per gallon, excluding	(1) Whenever the organic solvent content, the volume of solids, the weight of solids, the water content and the density of surface coatings is required to demonstrate compliance, the permittee shall use U.S. EPA Method 24 or 24A or another test method approved by the Department in writing. [ss. NR 439.06(3)(b), and NR 407.09(4)(a)3.b., Wis. Adm. Code] (2) The permittee shall have available the following records on a daily basis for each coating formulation used: (a) A unique name or identification number of coating, as applied; (b) A unique name or identification number and volume of clean-up solvent used, but not directed into a closed container (if any); (c) The VOC content of coating, as applied in units of pounds VOC per gallon, excluding water (clean-up solvents used that are not directed into a closed container shall be included in this computation). [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep the following monthly records: (a) The VOC content (in pounds per gallon) and quantity (in gallons) of each compliant coating and noncompliant coating applied during the month; (b) The quantity (in gallons) and VOC content (in pounds per gallon) of each cleanup solvent used during the month; (c) Amount of VOC emitted, in pounds per month. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) If non-compliant coatings are used at the facility, the permittee shall keep the following records on a monthly basis: (a) A unique name or identification number for each non-compliant coating applied; (b) The volume of each non-compliant coating applied during the month; (c) The aggregate volume of all non-compliant coatings applied during the month (including any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P43A); and (d) The aggregate volume of all non-compliant coatings applied (including any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P43A) during the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	This process has been shut down and removed from the Norwich site as of November 2014.

30. Process P65, Stack S65 — Drum Lid Clamp Dip Tank				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	the atmosphere. [s. NR 422.15(8), Wis. Adm. Code] Note: see condition I.ZZZ.1.a.(2), which limits VOC emissions from sources at Norwich Avenue site to 12,333 pounds per month, averaged over any 12 consecutive month period.	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 added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]		
2. Federal HAPs	(1) The permittee shall meet all applicable requirements in section I.N (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 08-RSG-053}] Note: Drum lid clamp coating operations (P65) at the facility are part of the general use coating affected source that is subject to National Emission Standards for Hazardous Air Pollutants:	(1) The permittee shall comply with all applicable compliance demonstration requirements in section I.N (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 08-RSG-053}]	(1) The permittee shall meet all applicable requirements in section I.N (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 08-RSG-053}]	See above.

G. Process P65, Stack S65 — Drum Lid Clamp Dip-Tank				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	Surface Coating of Miscellaneous Metal Parts and Products.			

H. Process P44, Stack S44 — Label Stripping — [Pennsylvania Avenue Site]				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. VOC	(1) Latest Available Control Technology (LACT) applies to this process. LACT is determined to be: (a) VOC emissions not to exceed 1,666 pounds per month averaged over any 12 consecutive month period; and (b) good operating practices. [s. NR 424.03(2)(c), Wis. Adm. Code {Permit 08-RSG-053}] (2) See condition 1.ZZZ.1.a.(1)	(1) Good operating practices 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 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 08-RSG-053}]	(1) The permittee shall keep records describing the good operating practices being implemented for this process. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep the following records: (a) MSDS or equivalent document for each solvent used in this process. (b) The VOC content of each solvent used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep monthly records of: (a) the quantity of each solvent used; (b) amount of VOC emitted (in pounds); (c) amount of VOC emissions emitted (in pounds per month) averaged over the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	This process was discontinued in November of 2014.
2. State HAP	(1) The permittee shall keep records to demonstrate that methylene chloride emissions from this process are exempt emissions under s. NR	(1) The permittee shall keep records to demonstrate that methylene chloride emissions from this process are exempt emissions under s. NR 445.07(5)(d)2., Wis. Adm. Code. (see note below) [s. 285.65(3), Wis. Stats., ss. NR	(1) The permittee shall keep records to demonstrate that methylene chloride emissions from this process are exempt emissions under s. NR 445.07(5)(d)2., Wis. Adm. Code. (see note below) [s. 285.65(3), Wis. Stats., ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] Note: Include records of applicable OSHA requirements, testing protocols, test results etc., to demonstrate that the source is in compliance with	See above.

H. Process P44, Stack S44 — Label Stripper [Pennsylvania Avenue site]				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	445.07(5)(d)2., Wis. Adm. Code. (see note below) [s. 285.65(3), Wis. Stats., ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] Note: Include records of applicable OSHA requirements, testing protocols, test results etc., to demonstrate that the source is in compliance with applicable occupational safety and health administration (OSHA) requirements.	439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] Note: Include records of applicable OSHA requirements, testing protocols, test results etc., to demonstrate that the source is in compliance with applicable occupational safety and health administration (OSHA) requirements.	applicable occupational safety and health administration (OSHA) requirements.	

I. Process P80A, Control C21, Stack (s) S21, S60 — Caustic Re-flush with Hot Caustic Heater Process P80B, Control C21, Stack (s) S21, S61 — Exterior Wash/Soaker with Hot Caustic Heater Process P80C, Control C21, Stack S21 — Exterior Rinse Process P95, Control C21, Stack S21 — Small Plastic Drum Caustic Re-flush				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Particulate Matter Emissions	(1) Particulate matter emissions from stack S21 may not exceed 0.47 pounds per hour. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) Particulate matter emissions from each stack S60 and S61may not exceed 0.02	(1) Only natural gas shall be combusted in the heaters. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2)(a) Emissions (except natural gas combustion products) from P80A and P80B shall be controlled by a wet scrubber (C21). (b) Emissions from P80C and P95 shall be controlled by a wet scrubber (C21). [s. 285.65(3), Wis. Stats., s. NR. 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(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 emissions (U.S. EPA Method 202) or another 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 08-RSG-053}] (2) The permittee shall measure and record the following	This process was discontinued in November of 2014.

1. Process P80A, Control C21, Stack(s) S21, S61 — Caustic Pre-flush With Hot Caustic Heater; Process P80B, Control C21, Stack(s) S21, S61 — Exterior Wash/Soaker with Hot Caustic Heater; Process P80C, Control C21, Stack S21 — Exterior Rinse; Process P95, Control C21, Stack S21 — Small Plastic Drum Caustic Pre-flush				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	pounds per hour. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(3) 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. [ss. NR 439.055(1)(c), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] (4) The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and maintenance/repair (as necessary) of: (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; and (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 08-RSG-053}]	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 08-RSG-053}] (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 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 08-RSG-053}] (4) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {08-RSG-053}]	
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(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 08-RSG-053}]	(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 {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will	See above.

E. Process P80A, Control C21, Stack(s) S21, S60 — Caustic Pre-flush with Hot Caustic Heater, Process P80B, Control C21, Stack(s) S21, S60 — Exterior Wash/Soaker with Hot Caustic Heater, Process P80C, Control 21, Stack S21 — Exterior Rinse, Process P95, Control C21, Stack S21 — Small Plastic Drum Caustic Pre-flush				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
			also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	
3. Sodium Hydroxide (NaOH)	(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 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions in conditions I.I.1.b.(2) through (4) shall also serve as a compliance demonstration method for sodium hydroxide emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) The recordkeeping and monitoring requirements for particulate matter emissions in conditions I.I.1.c.(2) through (3) will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	See above.
4. NOx	(1) Each of the processes P80A, P80B may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that each of the processes P80A, P80B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.I.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	See above.
5. Federal HAPs	(1) The permittee shall meet the applicable limitations in section I.O. (National Emission Standards for Hazardous Air Pollutants:	(1) The permittee shall comply with the applicable compliance demonstration requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a)3.b.,	(1) The permittee shall meet the applicable recordkeeping and monitoring requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a),	See above.

N. Process P80A, Control C21, Stack(s) S21, S60 — Caustic Pre-Wash with Hot Caustic Heater; Process P80B, Control C21, Stack(s) S21, S61 — Exterior Wash/Soaker with Hot Caustic Heater; Process P80C, Control C21, Stack S21 — Interior Rinse; Process P95, Control C21, Stack S21 — Small Plastic Drum Caustic Pre-Wash				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats. {2410633570-P12}]	Wis. Adm. Code {2410633570-P12}]	Wis. Adm. Code {2410633570-P12}]	

M. 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]	
a. Condition Type: Emission Limits	COMPLIANCE STATUS
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 {Permit 08-RSG-053}]** Notes: *(1)* 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. *(2)* 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.	This process was relocated to the Pennsylvania location in November of 2014.

M. 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	COMPLIANCE STATUS:
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.N.1.a.(1). To make this determination, you shall use at least one of the compliance options listed in Conditions I.N.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 entire 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 shall document this switch as required by Condition I.N.5.a.(1)(c), and you shall report it in the next semiannual compliance report required in Condition I.N.4. **[s. NR 465.43(2), Wis. Adm. Code; 40 CFR 63.3891]** (2) *Compliant material option.* You shall meet all the requirements of s. NR 465.46 to demonstrate compliance with the emission limit in Condition I.N.1.a.(1) using this option. To use this option, you shall demonstrate that the organic HAP content of each coating used in the coating operation or operations is less than or equal to the emission limit in Condition I.N.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 [Permit 08-RSG-053]]** (3) *Emission rate without add-on controls option.* You shall meet all the requirements of s. NR 465.47 to demonstrate compliance with the emission limit in Condition I.N.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 operation or operations is less than or equal to the emission limit in Condition I.N.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)]** Note: Add-on controls option is not included in this permit as the facility does not use add-on control equipment to demonstrate compliance. Requirements for add-on control option can be found in s. NR 465.48, Wis. Adm. Code.	See above.
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.N.1.a.(1) at all times. **[s. NR 465.44(1)(a)1., Wis. Adm. Code; 40 CFR 63.3900(a)(1)]** (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)]** (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]**	See above.

M. National Emission Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]	
1. Condition Type: Emission Limits	COMPLIANCE STATUS
4. Condition Type: Reports	
a. **Conditions:** (1) *Semiannual compliance reports.* You shall submit semiannual compliance reports for the affected source according to the requirements of (a) to (f). (a) *'Dates.'* You shall submit the first and subsequent compliance reports on the dates specified in Condition I.ZZZ.5.b.(1)(a). (b) *Inclusion with Title V report.'* You shall report all deviations in the semiannual monitoring report required by Condition I.ZZZ.5.a.(1). If you submit a semiannual compliance report pursuant to this Condition along with, or as part of, the semiannual monitoring report required by Condition I.ZZZ.5.a.(1), and the semiannual compliance report includes all required information concerning deviations from the emission limit in Condition I.N.1.a.(1), its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report does not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Department. (c) *'General requirements.'* The semiannual compliance report shall contain the information specified in (i) to (vii), and the information specified in (d) to (f) that is applicable to your affected source. (i) Company name and address. (ii) Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report. (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. The information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. (iv) Identification of the compliance option or options specified in Condition I.N.2. that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you shall report the beginning and ending dates for each option you used. (v) If you used the emission rate without add-on controls option in Condition I.N.2.a.(3), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. (vi) If you used the predominant activity alternative in Condition I.N.2.a.(4), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report. (vii) If you used the facility-specific emission limit alternative in Condition I.N.2.a.(4), include the calculation of the facility– specific emission limit for each 12–month compliance period during the 6–month reporting period. (d) *'No deviations.'* If there were no deviations from the emission limit in Condition I.N.1.a.(1), the semiannual compliance report shall include a statement that there were no deviations from the emission limits during the reporting period. (e) *'Deviations: compliant material option.'* If you used the compliant material option in Condition I.N.2.a.(2), and there was a deviation from the applicable organic HAP content requirement in Condition I.N.1.a.(1), the semiannual compliance report shall contain the information in (i) to (iv). (i) Identification of each coating used that deviated from the emission limit in Condition I.N.1.a.(1), and each thinner and other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. (ii) The calculation of the organic HAP content, using Equation 2 of Condition I.N.6.2.(c), for each coating identified in (i). You do not need to submit background data supporting this calculation, such as information provided by coating suppliers or manufacturers, or test reports. (iii) The determination of mass fraction of organic HAP for each thinner and other additive, and cleaning	Compliance – No deviations were reported during this inspection period.

M. National Emission Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Miscellaneous Metal Parts and Products Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM	
4. Condition Type: Addition of Limits	COMPLIANCE STATUS
material identified in (i). You do not need to submit background data supporting this calculation, such as information provided by material suppliers or manufacturers, or test reports. (iv) A statement of the cause of each deviation. (f) *Deviations: emission rate without add-on controls option.* If you used the emission rate without add-on controls option in Condition I.N.2.a.(3) and there was a deviation from the emission limit in Condition I.N.1.a.(1), the semiannual compliance report shall contain the information in (i) to (iii). (i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit in Condition I.N.1.a.(1) (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You shall submit the calculations for Equations 1, 1A to 1C, 2, and 3 of Condition I.N.7.a.(2); and if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition I.N.7.a.(2)(e)(ii). You do not need to submit background data supporting these calculations, such as information provided by materials suppliers or manufacturers, or test reports. (iii) A statement of the cause of each deviation. [s. NR 465.45(2), Wis. Adm. Code; 40 CFR 63.3926]	
5. Condition Type: Records	
a. **Conditions:** (1) You shall collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard. (a) A copy of each notification and report that you submitted to comply with this subchapter, and the documentation supporting each notification and report. (b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density or volume fraction of coating solids, you shall keep a copy of the complete test report. If you used information provided to you by the manufacturer or supplier of the material that was based on testing, you shall keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. (c) For each compliance period, the records specified in (i) to (iii): (i) A record of the coating operations on which you used each compliance option and the time periods, beginning and ending dates and times, for each option you used. (ii) For the compliant material option in Condition I.N.2.a.(2), a record of the calculation of the organic HAP content for each coating, using Equation 2 of Condition I.N.6.a.(2). (iii) For the emission rate without add-on controls option in Condition I.N.2.a.(3), a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and other additives, and cleaning materials used each month using Equations 1 and 1A to 1C and 2 of Condition I.N.7.a.(2) and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition I.N.7.a.(2) (e)(ii); the calculation of the total volume of coating solids used each month using Equation 2 of Condition I.N.7.a.(2); and the calculation of each 12-month organic HAP emission rate using Equation 3 of Condition I.N.7.a.(2). (d) A record of the name and volume of each coating, thinner and other additive, and cleaning material used during each compliance period. If you are using the compliant material option in Condition I.N.2.a.(2) for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.	See above.

M. 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]	
5. Condition Type: Limits and Limits	COMPLIANCE STATUS
(e) A record of the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during each compliance period unless the material is tracked by weight. (f) A record of the volume fraction of coating solids for each coating used during each compliance period. (g) If you use the emission rate without add-on controls option in Condition I.N.2.a.(3), the density for each coating, thinner, other additive and cleaning material used during each compliance period. (h) If you use an allowance in Equation 1 of Condition I.N.7.a.(2) for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF)according to Condition I.N.7.a.(2) (e)(ii), you shall keep records of the information specified in (i) to (iii). (i) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of Condition I.N.7.a.(2); a statement of which subparts under 40 CFR parts 262, 264, 265 and 266 apply to the facility; and the date of each shipment. (ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of Condition I.N.7.a.(2). (iii) The methodology used in accordance with Condition I.N.7.a.(2)(e)(ii) to determine the total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. You shall include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring and supporting calculations and documentation, including the waste manifest for each shipment. (i) You shall keep records of the date, time and duration of each deviation. [s. 465.45(3), Wis. Adm. Code; 40 CFR 63.3930] (2) Your records shall be in a form suitable and readily available for expeditious review, according to s. NR 460.09 (2) (a). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. (a) You shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. (b) You shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report or record. You may keep the records off-site for the remaining 3 years. [s. NR 465.45(4), Wis. Adm. Code; 40 CFR 63.3931]	
6. Condition Type: Compliance Requirements for the Compliant Material Option	
a. Conditions: (1) You shall complete the initial compliance demonstration for the initial compliance period according to the requirements in (2) *[i.e. condition I.N.6.a.(2) below]*. The initial compliance period begins on January 2, 2007 and ends on the last day of the 12th month following the compliance date. The initial compliance period extends through January, 2007 plus the next 12 months. The initial compliance demonstration includes the calculations according to (2) and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the emission limit in Condition I.N.1.a.(1), and that you used no thinners or other additives, or cleaning materials that contained organic HAP as determined according to (2)(a). [s. NR 465.46(1), Wis. Adm. Code; 40 CFR 63.3940]	See above.

M. 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]

I. Condition Type: Emission Limits	COMPLIANCE STATUS
(2) You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source or for all the coating operations in the affected source. You shall use either the emission rate without add-on controls option in Condition I.N.2.a.(3) for any coating operation in the affected source for which you do not use the compliant material option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations may not use any coating with an organic HAP content that exceeds the emission limit in Condition I.N.1.a.(1) and shall use no thinner or other additive, or cleaning material that contains organic HAP as determined according to (a) to (d). Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in s. NR 465.43 (3) and (4). You shall meet all the requirements of this section. You shall use the procedures in (a) to (d) on each coating, thinner, other additive and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to re-determine the organic HAP content of coatings, thinners, other additives and cleaning materials that are reclaimed on-site, or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site, and reused in the coating operation or operations for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. (a) *Determine the mass fraction of organic HAP for each material used.* You shall determine the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during the compliance period by using one of the following 5 options: (i) *'Method 311.'* You may use Method 311 in 40 CFR part 63, Appendix A, for determining the mass fraction of organic HAP. You shall use the procedures specified in (A) and (B) when performing a Method 311 test. (A) Count each organic HAP that is measured to be present at 0.1% by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. Express the mass fraction of each organic HAP you count as a value truncated to 4 places after the decimal point. (B) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to 3 places after the decimal point. (ii) *'Method 24.'* For coatings, you may use Method 24 in 40 CFR part 60, Appendix A, to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in 40 CFR part 63, Subpart PPPP Appendix A, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in 40 CFR part 63, Subpart PPPP, Appendix A as a substitute for the mass fraction of organic HAP. (iii) *'Alternative method.'* You may use an alternative test method for determining the mass fraction of organic HAP once the administrator has approved it. You shall follow the procedure in s. NR 460.06 (5) to submit an alternative test method for approval. (iv) *'Information from the supplier or manufacturer of the material.'* You may rely on information other than that generated by the test methods specified in (i) to (iii), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction content. If there is a disagreement between the manufacturer's data and results of a test conducted according to (i) to (iii), then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (v) *'Solvent blends.'* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted	

M. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 463, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]	
1. Condition Type: Emission Limits	COMPLIANCE STATUS
toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 2 or 3 of ch. NR 465, Subchapter V, Wis. Adm. Code. If you use the tables, you shall use the values in Table 2 for all solvent blends that match Table 2 entries according to the instructions for Table 2, and you may use Table 3 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 2 and you know only whether the blend is aliphatic or aromatic. However, if the results of a test using Method 311 in 40 CFR part 63, Appendix A, indicate higher values than those listed on Table 2 or 3, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (b) *Determine the volume fraction of coating solids for each coating.* You shall determine the volume fraction of coating solids, in liters (gallons) of coating solids per liter (gallon) of coating, for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in (i) to (iv). If test results obtained according to (i) do not agree with the information obtained under (iii) or (iv), the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (i) *ASTM D2697–86 (1998) or ASTM D6093–97 (2003).* You may use ASTM D2697–86 (1998) "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings", or ASTM D6093–97 (2003) "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer", to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. (ii) *Alternative method'* You may use an alternative test method for determining the solids content of each coating once the administrator has approved it. You shall follow the procedure in s. NR 460.06(5) to submit an alternative test method for approval. (iii) *Information from the supplier or manufacturer of the material'* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. (iv) *Calculation of volume fraction of coating solids'* You may determine the volume fraction of coating solids using the following equation: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$ (Equation 1) where: V_s is the volume fraction of coating solids, liters (gallons) of coating solids per liter (gallon) of coating. $m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds, water and exempt compounds, determined according to Method 24 in 40 CFR part 60, Appendix A, grams (lb) of volatile matter per liter (gallon) of coating. D_{avg} is the average density of volatile matter in the coating, grams (lb) of volatile matter per liter (gallon) of volatile matter, determined from test results using ASTM D1475–98 (2003) "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 (2003) test results and other information sources, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM D1475–98 (2003) "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM D1475–98 (2003) test results	

M. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 466, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]	
1. Condition Type: Emission Limits	COMPLIANCE STATUS
and the supplier's or manufacturer's information, the test results will take procedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. (d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content of each coating used during the compliance period using the following equation: $H_o = \frac{(D_c)(W_o)}{V_s}$ (Equation 2) where: H_o 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 (c). W_o is the mass fraction of organic HAP in the coating, kg (lb) of organic HAP per kg (lb) of coating, determined according to (a). V_s is the volume fraction of coating solids, liter (gallon) of coating solids per liter (gallon) of coating, determined according to (b). (e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period shall be less than or equal to the emission limit in Condition I.N.1.a.(1); and each thinner and other additive, and cleaning material used during the initial compliance period shall contain no organic HAP, determined according to (a). You shall keep all records required by Condition I.N.5. [s. NR 465.46(2), Wis. Adm. Code; 40 CFR 63.3941] (3)(a) For each compliance period, to demonstrate continuous compliance, you shall use no coating for which the organic HAP content, determined using Equation 2 of (2)(d), exceeds the emission limit in Condition I.N.1.a.(1), and use no thinner or other additive, or cleaning material that contains organic HAP, determined according to (2)(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in (1), is the end of a compliance period consisting of that month and the preceding 11 months. (b) If you choose to comply with the emission limit in Condition I.N.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 (a) is a deviation from the emission limits in Condition I.N.1.a.(1) that shall be reported as specified in Condition I.N.4.a.(1)(e). (c) As part of each semiannual compliance report required by Condition I.N.4.a.(1), you shall identify the coating operations for which you used the compliant material option. If there were no deviations from the emission limit in Condition I.N.1.a.(1), submit a statement that the coating operations were in compliance with the emission limits during the reporting period because you used no coatings for which the organic HAP content exceeded the emission limit in Condition I.N.1.a.(1), and you used no thinner, other additive or cleaning material that contained organic HAP, determined according to (2)(a). (d) You shall maintain records as specified in Condition I.N.5. [s. NR 465.46(3), Wis. Adm. Code; 40 CFR 63.3942]	
7. Condition Type: Compliance Requirements for the Emission Rate Without Add-on Control Option	
a. **Conditions:** (1) You shall complete the initial compliance demonstration for the initial compliance period according to the requirements of (2) *[i.e. condition I.N.7.a.(2)]*. The initial compliance period begins on January 2, 2007 and ends on the last day of the 12th month following the compliance date. The initial compliance period extends through the end of that month plus the next 12 months. You shall determine the mass of organic HAP emissions and	See above.

M. 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	COMPLIANCE STATUS
volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to (2) and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the emission limit in Condition I.N.1.a.(1). **[s. NR 465.47(1), Wis. Adm. Code; 40 CFR 63.3950]** (2) You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You shall use the compliant material option in Condition I.N.2.a.(2) for any coating operation in the affected source for which you do not use the emission rate without add-on controls option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations shall meet the emission limit in Condition I.N.1.a.(1), but is not required to meet the operating limits or work practice standards in s. NR 465.43 (3) and (4). You shall meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners or other additives, or cleaning materials used on coating operations for which you use the compliant material option in Condition I.N.2.a.(2). You do not need to redetermine the mass of organic HAP in coatings, thinners or other additives, or cleaning materials that have been reclaimed on-site, or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site, and reused in the coating operation or operations for which you use the emission rate without add-on controls option. If you use coatings, thinners or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. (a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during each month according to the requirements in Condition I.N.6.a.(2)(a). (b) *Determine the volume fraction of coating solids.* Determine the volume fraction of coating solids, in liters (gallons) of coating solids per liter (gallon) of coating, for each coating used during each month according to the requirements in Condition I.N.6.a.(2)(b). (c) *Determine the density of each material.* Determine the density of each liquid coating, thinner or other additive, and cleaning material used during each month from test results using ASTM D1475-98 (2003), "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM D5965-02 "Standard Test Methods for Specific Gravity of Coating Powders", or information from the supplier. If there is disagreement between ASTM Method D1475-98 (2003) or ASTM Method D5965-02 test results and other information sources, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C and 2 of this section. (d) *Determine the volume of each material used.* Determine the volume, in liters or gallons, of each coating, thinner and other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C of this section. (e) *Calculate the mass of organic HAP emissions.* (i) The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using the following equations and the	

M. 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	COMPLIANCE STATUS

procedures in (ii) if applicable:

Calculate the mass of organic HAP emissions using Equation 1:

$$H_e = A + B + C - R_w \qquad \text{(Equation 1)}$$

where:

H_e is the total mass of organic HAP emissions during the month, kg (lb).

A is the total mass of organic HAP in the coatings used during the month, kg (lb), as calculated in Equation 1A of this section.

B is the total mass of organic HAP in the thinners and other additives used during the month, kg (lb), as calculated in Equation 1B of this section

C is the total mass of organic HAP in the cleaning materials used during the month, kg (lb), as calculated in Equation 1C of this section.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg (lb), determined according to (ii). You may assign a value of zero to Rw if you do not wish to use this allowance. Calculate the kg (lb) organic HAP in the coatings used during the month using Equation 1A:

$$A = \sum_{i=1}^{m} (Vol_{c,i})(D_{c,i})(W_{c,i}) \qquad \text{(Equation 1A)}$$

where:

A is the total mass of organic HAP in the coatings used during the month, in kg (lb).

$Vol_{c,i}$ is the total volume of coating, i, used during the month, in liters (gallons).

$D_{c,i}$ is the density of coating, i, kg (lb) of coating per liter (gallon) of coating.

$W_{c,i}$ is the mass fraction of organic HAP in coating, i, kg (lb) of organic HAP per kg (lb) of coating. For reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in 40 CFR part 63, Subpart PPPP, Appendix A.

m is the number of different coatings used during the month.

Calculate the kg (lb) of organic HAP in the thinners and/or other additives used during the month using Equation 1B:

$$B = \sum_{j=1}^{n} (Vol_{t,j})(D_{t,j})(W_{t,j}) \qquad \text{(Equation 1B)}$$

where:

B is the total mass of organic HAP in the thinners and other additives used during the month, in kg (lb).

$Vol_{t,j}$ is the total volume of thinner or other additive, j, used during the month, in liters (gallons).

$D_{t,j}$ is the density of thinner or other additive, j, kg per liter (lb per gallon).

$W_{t,j}$ is the mass fraction of organic HAP in thinner or other additive, j, kg (lb) of organic HAP per kg (lb) of thinner or other additive. For reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in 40 CFR part 63, Subpart PPPP, Appendix A.

n = is the number of different thinners and other additives used during the month.

Calculate the kg (lb) organic HAP in the cleaning materials used during the month using Equation 1C:

M. National Emission Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 463, Subchapter V, Wisconsin Administrative Code and 40 CFR 63, Subpart MMMM]	
d. Condition Type: Emission Limits	COMPLIANCE STATUS
$C = \sum_{k=1}^{p} (Vol_{s,k})(D_{s,k})(W_{s,k})$ (Equation 1C) where: C is the total mass of organic HAP in the cleaning materials used during the month, in kg (lb). $Vol_{s,k}$ is the total volume of cleaning material, k, used during the month, in liters (gallons). $D_{s,k}$ is the density of cleaning material, k, kg per liter (lb per gallon). Ws,k is the mass fraction of organic HAP in cleaning material, k, kg (lb) of organic HAP per kg (lb) of material p is the number of different cleaning materials used during the month. (ii) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you shall determine the mass according to (A) to (D): (A) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265 or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater. (B) You shall determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month. (C) Determine the total mass of organic HAP contained in the waste materials specified in (B). (D) You shall document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in Condition I.N.5.a.(1)(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them. (f) *Calculate the total volume of coating solids used.* Determine the total volume of coating solids used, liters (gallons), which is the combined volume of coating solids for all the coatings used during each month, using the following equation: $V_{st} = \sum_{i=1}^{m} (Vol_{c,i})(V_{s,i})$ (Equation 2) where: V_{st} is the total volume of coating solids used during the month, liters (gallons). $Vol_{c,i}$ is the total volume of coating i, used during the month, liters (gallons). $V_{s,i}$ is the volume fraction of coating solids for coating i, liters (gallons) of solids per liter (gallon) of coating, determined according to Condition I.N.6.a.(2)(b) m is the number of coatings used during the month. (g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period using the following equation:	

M. 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 MMM]	
3. Condition Type: Emission Limits	COMPLIANCE STATUS
$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}} \quad \text{(Equation 3)}$$	
where:	
H_{yr} is the average organic HAP emission rate for the compliance period, kg (lb) of organic HAP emitted per liter (gallon) of coating solids used.	
H_e is the total mass of organic HAP emissions from all materials used during month y, kg (lb), as calculated by Equation 1 of this section.	
V_{st} is the total volume of coating solids used during month y, liters (gallons), as calculated by Equation 2 of this section.	
y is the number of the month in the compliance period.	
n is the number of full or partial months in the compliance period. For the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13. For all following compliance periods, n equals 12.	
(h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section shall be less than or equal to the emission limit in Condition I.N.1.a.(1). You shall keep all records as required by Condition I.N.5.	
[s. NR 465.47(2), Wis. Adm. Code; 40 CFR 63.3951]	
(3)(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to (2)(a) to (g) *[i.e. conditions I.N.7.a.(2)(a) through (g)]*, shall be less than or equal to the emission limit in Condition I.N.1.a.(1). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in (1) is the end of a compliance period consisting of that month and the preceding 11 months. You shall perform the calculations in (2)(a) to (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under Condition I.N.2.a.(4), you shall also perform the calculation using Equation 1 in s. NR 465.43 (1) (c) 2. on a monthly basis using the data from the previous 12 months of operation.	
(b) If the organic HAP emission rate for any 12-month compliance period exceeded the emission limit in Condition I.N.1.a.(1), this is a deviation from the emission limit for that compliance period and shall be reported as specified in Condition I.N.4.a.(1)(f).	
(c) As part of each semiannual compliance report required by Condition I.N.4., you shall identify the coating operations for which you used the emission rate without add-on controls option. If there were no deviations from the emission limit in Condition I.N.1.a.(1), you shall submit a statement that the coating operations were in compliance with the emission limits during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the emission limit in Condition I.N.1.a.(1), determined according to (2)(a) to (g).	
(d) You shall maintain records as specified in Condition I.N.5.	
[s. NR 465.47(3), Wis. Adm. Code; 40 CFR 63.3952]	

O. National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Sources (40 CFR part 63, subpart DDDDD – Boiler MACT)				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
1. Federal HAPs	(1) No later than January 31, 2016, the permittee shall have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in Table 3 of 40 CFR 63, subpart DDDDD, satisfies the energy assessment. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. [40 CFR §§ 63.7495(b), 63.7500(a)(1), 63.7510(e), and Table 3 of subpart DDDDD, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (2) No later than January 31, 2016, and every	(1) The energy assessment shall include: (a) A visual inspection of the boiler or process heater system; (b) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints; (c) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator; (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; (e) A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified; (f) A list of cost-effective energy conservation measures that are within the facility's control; (g) A list of the energy savings potential of the energy conservation measures identified; and (h) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [Table 3 of subpart DDDDD, 40 CFR 63, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (2) Each boiler tune-up shall be conducted as follows: (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next	(1) The permittee shall maintain copies of each notification and report submitted to comply with 40 CFR 63, subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or annual, 2-, or 5-year compliance report submitted, according to the requirements in § 63.10(b)(2)(xiv). [40 CFR § 63.7555(a) and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (2) Before the close of business on the 60th day following the completion of all initial compliance demonstrations (facility energy assessment and boiler tune-ups) for all boiler or process heaters at the facility, not to exceed March 31, 2016, the permittee shall submit a Notification of Compliance Status according to §§ 63.9(h)(2)(ii) and 63.10(d)(2). The notification shall contain the following information: (a) A description of the affected unit(s) including identification of which subcategory the unit is in, the design heat input capacity of the unit, description of the fuel(s) burned, and justification for the selection of fuel(s) burned during the compliance demonstration. (b) A signed certification that the permittee have met all applicable work practice standards. (c) If there is a deviation from any work practice standard, the permittee shall also submit a description of the deviation, the duration of the deviation, and the	No Evidence of Noncompliance – Boiler B20 appears to have been shut down since November 2013. There is no indication that US EPA was ever notified of the change in operational status for this boiler.

O. National Emission Standards for Hazardous Air Pollutants (NESHAP), Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Sources (40 CFR part 63, subpart DDDDD – Boiler MACT).				
POLLUTANT	A. LIMITATIONS	B. COMPLIANCE DEMONSTRATION	C. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	5 years thereafter, not to exceed 61 months after the previous tune-up, the permittee shall conduct a tune-up of each boiler and process heater designed to burn a gas 1 fuel with a continuous oxygen trim system that maintains an optimum air to fuel ratio or a heat input capacity of less than or equal to 5 million Btu per hour. [40 CFR §§ 63.7495(b), 63.7500(a)(1) and (e), 63.7510(e), 63.7515(d), and Table 3 of subpart DDDDD, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (3) No later than January 31, 2016, and biennially (every 2 years) thereafter, not to exceed 25 months after the previous tune-up, the permittee shall conduct a tune-up of each boiler and process heater designed to burn a gas 1 fuel2 (which includes	scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available; (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection; (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject; (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and (f) Maintain on-site and submit, if requested by the U.S. EPA, an annual report containing the information below (Paragraphs (a)(10)(vi)(A) through (C) of 40 CFR § 63.7540).	corrective action taken in the Notification of Compliance Status report. (d) In addition to the information required in § 63.9(h)(2), the Notification of Compliance Status must include the following certification(s) of compliance, as applicable, and signed by a responsible official: (i) "This facility complies with the required initial tune-up according to the procedures in § 63.7540(a)(10) (i) through (vi)." (ii) "This facility has had an energy assessment performed according to § 63.7530(e)." (iii) Except for units that burn only natural gas or other gas 1 fuel, include the following: "No secondary materials that are solid waste were combusted in any affected unit." [40 CFR §§ 63.7530(d) through (f), and 63.7545(e) and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (3) After submittal of the Notification of Compliance Status, the permittee shall submit annual, biennial and/or 5-year compliance reports. For units that are subject only to a requirement to conduct an annual, biennial or 5-year tune-up according to § 63.7540(a)(10), (11) or (12), respectively, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in	

O. National Emission Standards for Hazardous Air Pollutants (NESHAP): Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Sources, (40 CFR part 63, subpart DDDDD - Boilers MACT).				
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
	natural gas) without a continuous oxygen trim system and with heat input capacity greater than 5 million Btu and less than 10 million Btu per hour. [40 CFR §§ 63.7495(b), 63.7500(a)(1) and (e), 63.7510(e), 63.7515(d), and Table 3 of subpart DDDDD, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)]	(i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; (ii) A description of any corrective actions taken as a part of the tune-up. (iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [40 CFR § 63.7540 (a)(10), (11), (12) and (13), and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)]	paragraphs (b)(1) through (5) of § 63.7550, instead of a semi-annual compliance report. The first compliance report shall cover the period beginning on January 31, 2016, and ending on December 31, 1016 for an annual compliance report, December 31, 2017 for a biennial compliance report, or December 31, 2020 for a 5-year compliance permit, as applicable. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than January 31. Each subsequent annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. The subsequent annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than January 31. Each compliance report shall contain the following information: (a) Company and Facility name and address. (b) Process unit information, emissions limitations, and operating parameter limitations. (c) Date of report and beginning and ending dates of the reporting period. (d) The total operating time during the reporting period. (e) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to § 63.7540(a)(10), (11), or (12) respectively. Include the date of the most recent	

O. National Emission Standards for Hazardous Air Pollutants (NESHAP): Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Sources (40 CFR part 63, subpart DDDDD – Boiler MACT)				
POLLUTANTS	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
			burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (f) If there are no deviations from the requirements for work practice standards in Table 3 to subpart DDDDD that apply, a statement that there were no deviations from the work practice standards (missed boiler tune-ups) during the reporting period. (g) If there is a deviation from a work practice standard during the reporting period, the report must contain a description of the deviation (which boiler tune-up was missed), duration and cause of the deviation, and the corrective action taken. The permittee shall submit all reports electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee shall submit the report to the U.S. EPA at the appropriate address listed in § 63.13. At the discretion of the US EPA, the permittee shall also submit these reports, to the US EPA in the format specified by the US EPA. [40 CFR § 63.7550 and Table 9 of subpart DDDDD, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)]	

ZZZ. Conditions Applicable to the Entire Facility.			
a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. RECORDKEEPING REQUIREMENTS	d. COMPLIANCE STATUS
SYNTHETIC MINOR CONDITIONS (1) VOC emissions from the Pennsylvania Avenue site (excluding VOC emissions from combustion of natural gas) may not exceed 4,000 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] Note: Permittee elected this condition to avoid non-attainment area major source review under the ozone 1-hr standard, for 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 are less than 1 tpy. (2) VOC emissions from the Norwich Avenue site (excluding VOC emissions from combustion of natural gas) may not exceed 12,333 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] (3) VOC emissions from combustion of natural gas at the facility may not exceed 250 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] Note: Elected conditions (1), (2) and (3) ensure VOC emissions from the facility are less than 100 tpy. Therefore, the facility will remain a synthetic minor moderate non-attainment area minor source under the ozone 8-hr standard.	(1) Within 15 days of end of each calendar month, the permittee shall compute and record the following: (a) Total amount of VOC emitted (in pounds) from processes (other than from combustion of natural gas) located at Pennsylvania Avenue Site; (b) Total amount of VOC emitted (in pounds) from processes (other than from combustion of natural gas) located at Norwich Avenue Site; (c) Total amount of VOC emitted (in pounds) from combustion of natural gas at the facility; (d) Amount of VOC emitted (in pounds per month) from processes (other than from combustion of natural gas) located at Pennsylvania Avenue Site, averaged over the last 12 consecutive month period. (e) Amount of VOC emitted (in pounds per month) from processes (other than from combustion of natural gas) located at Norwich Avenue Site, averaged over the last 12 consecutive month period. (f) Amount of VOC emitted (in pounds per month) from combustion of natural gas at the facility, averaged over the last 12 consecutive month period. [s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] Note: VOC emission sources at the facility include natural gas combustion units (e.g. boiler, reclamation furnace, curing/drying ovens, caustic/water heaters), paint booths, Drum lid clamp dip tank (P65), plastic drum label stripping (P44), Plastic drum cleaning (P45 - when VOC containing solvents are used)	(1) The permittee shall keep the following monthly records: (a) Total amount of natural gas combusted in processes at the facility (Pennsylvania Avenue Site + Norwich Avenue Site) [s. NR 439.04(1)(d), Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep and maintain the records required in condition I.ZZZ.1.b.(1). [s. NR 439.04(1)(d), Wis. Adm. Code {Permit 08-RSG-053}]	No Evidence of Noncompliance --The permittee has indicated that the solvent emitting processes at this location have ceased operating since the previous inspection.

LZZ.			
a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. RECORDKEEPING AND MONITORING REQUIREMENTS	COMPLIANCE STATUS
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 {Permit 08-RSG-053}]* (2) Methylene chloride (indoor fugitive) emissions from process P44; In order to demonstrate that methylene chloride (indoor fugitive) emissions are exempt from NR 445 review, permittee shall demonstrate to the Department that the source is in compliance with applicable occupational safety and health administration requirements. [s. NR 445.07(5)(d)2., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	(1) The permittee shall only burn Group 1 virgin fossil fuels (Natural gas, propane, distillate #2 and diesel fuel oil) when firing any fuel combustion sources. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* (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. 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]* (5) See conditions in sections LE.1, LI.3, and LL.3 for applicable requirements for NaOH emissions.	(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 U.S. EPA or the Department. [ss. NR 407.09(1)(c)1.a. & 4(a)1. and NR 439.06(8), Wis. Adm. Code]. (2) The permittee shall keep records of any test results (including sampling protocol), and any other information used to demonstrate compliance with condition LZZ.2.a.(2). [s. NR 439.04(1)(d), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	No Evidence of Noncompliance

FACILITY REPORTING REQUIREMENTS:

Requirement	Frequency and/or Due Date	Submittal Status
Annual Air Emissions Inventory	March 1	No Evidence of Noncompliance
Semi Annual Monitoring Report	July 15th and February 14th	In compliance
Annual Compliance Certification	February 15th	In compliance

RESULTS OF PREVIOUS FCE REPORTS/SITE VISITS:

FCE Report Date	Result	Comments
February 14, 2011	In Compliance	
April 15, 2015	In Compliance	The Norwich Avenue facility is in the process of shutting down as operations are being constructed within the Pennsylvania Avenue Site.

RESULTS OF PREVIOUS EMISSION TESTS:

Source	Test Date	Pollutant(s)	Emission Limit	Result	Comments
P30	January/2005	PM	5.0 lbs/hr	4.01 lbs/hr	

SUMMARY OF PREVIOUS COMPLAINTS:

Complaint Date	Complaint Description	Follow-Up Action	Comments
06/05/2014	Odor	Surveillance	
03/19/2014	Odor	Surveillance	

SUMMARY OF PREVIOUS ENFORCEMENT ACTIONS:

Action Date	Action Type	NR Code Cited	Resolved	Comments
December 7, 2007	Notice of Violation (NOV)	s. NR 423.03 (metal cleaning), s. NR 423.035 (industrial cleaning), or s. NR 424.03 (process line)	Y	The facility discontinued the use of RC Lacquer Solvent. Only acetone (non-VOC) is used.
		ss. NR 406.03 and NR 406.04(2) (construction permit)	Y	The facility is in the process of file a construction permit for the Pennsylvania Avenue Site.
		s. 285.60, Wis. Stats (operation permit compliance)	Y	The facility has improved its recordkeeping procedures and is submitting its required reports in a timely manner.

INSPECTION FIELD NOTES AND DISCUSSION

The purpose of this inspection was to determine the facility's compliance status with respect to Wisconsin's air pollution control regulations and the facility's Air Operation Permit 241063570-P12. This inspection was coordinated with Mr. Mark Ferguson, Facility Manager for Mid-America Steel Drum - CLCM. Also present during this inspection was Daniel Hellenberg - WDNR. During the inspection, the weather conditions were partly cloudy with winds from the east at 5 to 10 miles per hour. The temperature was 45 °F.

The facility is being used as a warehouse for Mid-America Steel Drum - CLCM. Three of the processes are in the process of being relocated from the Norwich building to the Pennsylvania building under construction permit 14-RSG-142. The processes are: 1) P50C: Closed Drum Drying Oven, 2) P32C: Auto Exterior Drum Spray Booth, C32C: Overspray filter, and 3) P32B: Curing Oven. Follow-up correspondence indicates the relocation of P50C has yet to occur. During the previous inspection in 2015, all that remained were remnants of equipment left behind or apparently abandoned in place. No compliance determination is necessary for processes that have been removed, relocated, or abandoned in place. During this inspection, the manufacturing spaces in the western half of the building were filled with drums. The eastern half of the building was occupied by Complete Recycling Services LLC., a scrap recycler.

The Department needs further information and evaluation to determine the relationship between the Pennsylvania Ave. location and the previous operation at Norwich Ave. This relationship has an impact on the applicability of 40 CFR Part 63 Subpart MMMM to the current facility operations at Pennsylvania Ave.

RECOMMENDATIONS/CONCLUSIONS
A portion of the original facility is being used as a warehouse for the Mid-America Steel Drum - CLCM.

SAFETY EQUIPMENT REQUIRED TO GAIN ACCESS TO SITE:

- ☐ **HEARING PROTECTION**
- ☒ **HARD HAT**
- ☒ **SAFETY GLASSES**
- ☒ **SAFETY SHOES**
- ☐ **OTHER (e.g. Safety Vest and Dust Mask)** **SPECIFY:** _____

State of Wisconsin

CORRESPONDENCE/MEMORANDUM

DATE: June 19, 2017 FILE REF: 4530

TO: Air Management Case File - FID 341158070

FROM: Mike Griffin

SUBJECT: Addendum to FCE Report of March 27, 2017

Air Permit 14-RSG-142, condition I.G.1.b.(2) requires the dry filters used in process P32C to have a particulate control efficiency of at least 99%. During the inspection on March 27, 2017, I inquired about the control efficiency of the dry filters used on process P32C. Amy Litcher stated that the filters used are a 3200 Series Spra-gard high efficiency paint filter. To confirm this with the company, I sent an email inquiry to CLCM dated April 6, 2017. I requested CLCM to provide a spec sheet and include the efficiency for the type of coating being applied. In a response letter from Foley and Lardner LLP dated May 12, 2017, their response was:

" The CLCM overspray paint filter (C32C) *[Process P32C]* is a model RP PA Model 3300. Please see Attachment A) enclosed with this response for the filter spec sheet and the efficiencies of the filter under various conditions. Efficiencies are not provided by specific coating type."

I understood that this information on filter type and series being used in the May 12, 2017 response was not consistent with the information provided during the time of the inspection. Due to timing restrictions, the FCE report was finalized without additional detailed information to substantiate one filter type over the other. Further review of file information and the reference documentation provided by Foley and Lardner LLP dated May 12, 2017, as described below supports a finding of noncompliance.

On June 13, 2017, I was reviewing the CLCM Malfunction Prevention and Abatement Plan (MPAP) dated November 13, 2015. The MPAP states that the materials and spare parts maintained:

<u>Filters:</u>

Description:	Paper booth filters
Item Number(s):	2.5 x 20 x 20 PA 14 GT/RP (M&M) 3232
Two-Week Supply (Quantity):	200

The Foley and Lardner response of May 12, 2017, included a filter manufacturer's brochure, Research Products Corporation (RP) of Madison, WI. This brochure shows the various filter types, series and filter efficiencies. I contacted RP at 888-742-2402 and RP confirmed that the RP 3232 is their product and RP3232 is a 3200 series filter with the last two digits being used to reference a standard filter size (dimensions). On page 7 of attachment A, the 3200 series Spra-Gard table indicates the average efficiency range is 97.0 to 98.0% for waterborne bake enamel coatings. Refer to Table A and B, for general series ratings and detailed information. Note that the 3300 series has an average efficiency rating of 98.5 to 99.2 percent, but due to significant digits in the permit limit (two digits), the 3300 series would be acceptable due to rounding off.

Amy Litcher provided a listing of paint SDS's for those used by CLCM on March 27, 2017, during the inspection. From this listing, the first coating is "Yellow Aqua Enamel". The paint contains about 50% water and is identified as enamel paint. Many of the remaining coatings are manufactured by Watson Standard that indicate a water content of greater than 40% water. After being coated, the paint is cured in the Paint Drying Tunnel (Process P32B). The oven temperature is maintained at 350 to 400 Deg F. Under

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NR 422.02 Wis. Adm. Code, a baked coating is any coating which is cured in an oven where the temperature of the coated object exceeds 194 Deg F.

Therefore, based on the additional information obtained, the permittee is believed to have been operating in noncompliance with Air Permit 14-RSG-142, condition I.G.1.b.(2), which requires the dry filters used in process P32C to have a particulate control efficiency of at least 99%. The noncompliance finding noted on page 12 of the FCE, "Compliance Status" column (4), remains unchanged.

PAINT ARRESTOR SELECTION

Use this chart as a guideline for selecting the PA Series for the type of paint you are spraying.

PA Series		3000	3100	3200	3300	3400	3500	3700
Resistance to Airflow		Lower		Average		Higher	Average	Higher
Efficiency		Average	Higher					
Holding Capacity		Lower	Average		Higher			
High Viscosity Coatings (Wet & Sticky)	Adhesive	Good	Good	Better	Best	Best	Best	Best
	Air-Dry Enamels	Good	Better	Better	Best	Best	Better	Best
	Bake-Dry Enamels	Good	Better	Better	Best	Best	Better	Best
	Clear Coat	Good	Better	Better	Best	Better	Best	Better
	Epoxies	Good	Better	Best	Best	Best	Best	Best
	Fiberglass	Good	Better	Best	Best	Best	Best	Best
	Gel Coats	Good	Better	Best	Best	Best	Best	Best
	Hi-Solids Enamels	Good	Better	Best	Best	Best	Best	Best
	Primers - Air Dry	Good	Better	Best	Best	Best	Best	Best
	Teflon	Good	Better	Better	Best	Best	Better	Best
	Urethanes	Good	Better	Best	Best	Best	Best	Best
Low Viscosity Coatings (Wet & Runny)	Stains	Good	Good	Better	Best	Best	Better	Best
	Waterborne	Good	Good	Better	Best	Best	Better	Best
Dry, Dusty Coatings	Lacquers	Good	Good	Better	Best	Good	Good	Good
	Sealers	Good	Good	Better	Best	Good	Good	Good

TABLE A

PRODUCT	VELOCITY (FPM)	RESISTANCE (in. wg)	AVERAGE EFFICIENCY RANGE
3300 SERIES Spra-Gard **High Efficiency** **RP Paint Arrestors**	100 200 300	0.06 0.14 0.26	99.5 to 99.9% high solids bake enamel 98.5 to 99.2% waterborne bake enamel 95.0 to 96.0% lacquer Tested using single pad
3200 SERIES Spra-Gard **High Efficiency** **RP Paint Arrestors**	100 200 300	0.06 0.13 0.23	98.5 to 99.5% high solids bake enamel 97.0 to 98.0% waterborne bake enamel 94.0 to 95.0% lacquer Tested using two pads in tandem
3100 SERIES **Standard High Capacity** **RP Paint Arrestors**	100 200 300	0.02 0.05 0.10	94.0 to 96.0% high solids bake enamel 91.5 to 92.5% waterborne bake enamel Tested using two pads in tandem
3000 SERIES **Standard RP Paint Arrestors**	100 200 300	0.02 0.05 0.12	97.5 to 99.2% high solids bake enamel 93.0 to 94.0% waterborne bake enamel Tested using two pads in tandem

3500 SERIES

The 3500 Series was designed as a life extending prefilter. The main application of this product is for use in conjunction with any primary stage overspray filter. Utilizing the 3500 Series Paint Arrestor will save on life costs associated with replacing the more expensive primary filter by prolonging its service life. Additionally, it can be used in any spray coating application, plus it increases the flexibility of your operation.

FR SERIES **(Flame Retardant)**

All Research Products Paint Arrestors are available in flame retardant paper. Contact your representative for additional information and pricing.

Performance information shown was obtained using equipment similar to that incorporated by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) for evaluating performance of air cleaning media. Details regarding equipment testing procedure and test results are available by writing for Report No. 4259.

40 CFR PART 63 NESHAP

This filter series (3000, 3200, 3300, 3400, 3500) meets GACT for sources subject to SUBPART HHHHHH (Paint Stripping and Miscellaneous Surface Coatings of Area Sources) and SUBPART XXXXXX (Area Source Standards for Nine Metal Fabricating and Finishing Source Categories)
(>=98% Efficient when tested by ASHRAE Method 52.1 in accordance with NESHAP)

TABLE B