

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **13-04296**

**A. Source Description**

Gebauer Company has submitted Permits to Install for 2 vapocoolant packaging lines (Bowl Filler and British Filler)

**B. Facility Emissions and Attainment Status**

This facility has Title V status due to the potential to emit of 119.6 TPY of Organic Compounds from P001 and P002 (combined) and of Ethyl Chloride (HAP) of 13.8 TPY from P001. Cuyahoga County is currently designated as attainment for ozone.

**C. Source Emissions**

At the maximum rate, this source has a PTE in excess of 100 TPY for Organic Compounds and 10 TPY (13.8 TPY) of Ethyl Chloride, a HAP resulting in Title V applicability. However, the facility has requested a federally enforceable PTI (synthetic minor) in order to avoid Title V permitting. The allowable limit will be set at 22.7 TPY OC (total from P001 and P002) and 4.6 TPY of Ethyl Chloride based on a limit production of 1,600,000 packages per year for P001. No limit for packages per year is needed for P002 since Ethyl Chloride is not used in the emission unit and potential OC emissions (combined for P001 [17.3] and P002 [67.5]) do not exceed 100 TPY. However, for purposes of BAT, allowable emissions were based on a maximum production rate of 625,000 packages per year for P002. Allowable limit for OC from P001 and P002 will be set at 22.7 TPY of Organic Compounds. Air Toxics modeling for Dichlorotetrafluoroethane and Ethyl Chloride was conducted and allowable concentrations--for both--were determined to be under the MAGLC level.

**D. Conclusion**

Limiting the production of P001 and P002 will restrict total OC emissions to 22.7 TPY. Limiting production of P001 will restrict Ethyl Chloride emissions to 4.6 TPY. Therefore, Gebauer will not be subject to Title V permitting.

There are no other emissions units located at this facility.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY**

**CERTIFIED MAIL**

**Application No: 13-04296**

**DATE: 5/11/2004**

Gebauer Company  
Amy Paukovits  
9410 St. Catherine Avenue  
Cleveland, OH 44104

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CLAA

PA

**CUYAHOGA COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04296 FOR AN AIR CONTAMINANT SOURCE FOR  
GEBAUER COMPANY**

On 5/11/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Gebauer Company**, located at **4425 East 146th Street, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04296:

**Synthetic minor limits on emissions from Bowl Filler and British Filler -- P001 and P002.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue,  
Cleveland, OH 44114 [(216)664-2324]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-04296**

Application Number: 13-04296  
APS Premise Number: 1318002664  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Gebauer Company  
Person to Contact: Amy Paukovits  
Address: 9410 St. Catherine Avenue  
Cleveland, OH 44104

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4425 East 146th Street  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**Synthetic minor limits on emissions from Bowl Filler and British Filler -- P001 and P002.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	22.7
Ethyl Chloride (HAP)	4.6

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Bowl Filler for Vapocoolants (Skin Refrigerants) in Aerosol Delivery Packaging	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2) OAC rule 3745-35-07 (Synthetic Minor PTI to avoid Title V permitting)	11.9 lbs/hr organic compounds (OC) Exempt, see B.1 below 17.3 tons per rolling, 12-month period of OC; 4.6 tons per rolling, 12-month period of Ethyl Chloride; and see Section B.2 below

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. This emissions unit shall not employ photochemically reactive materials.
2. The maximum annual production rate for this emissions unit shall not exceed 1,600,000 containers, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production and emission levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u>	<u>Cumulative Tons OC</u>	<u>Cumulative Pounds Ethyl Chloride</u>
1	134,000 containers	1.44	766.7
1-2	268,000 containers	2.88	1,533.3
1-3	402,000 containers	4.32	2,300.0

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PTI A

Emissions Unit ID: **P001**

**Issued: To be entered upon final issuance**

1-4	536,000 containers	5.76	3,066.6
1-5	670,000 containers	7.20	3,833.3
1-6	804,000 containers	8.64	4,600.0
1-7	938,000 containers	10.08	5,366.7
1-8	1,072,000 containers	11.52	6,133.3
1-9	1,206,000 containers	12.96	6,900.0
1-10	1,340,000 containers	14.40	7,666.6
1-11	1,474,000 containers	15.84	8,433.3
1-12	1,600,000 containers	17.30	9,200.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling production rate and emissions limitations shall be based upon a rolling, 12-month summation of the monthly production rates and OC and ethyl chloride emissions.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the production rate (number of containers filled) for each product (Ethyl Chloride, Fluro-Ethyl, and Flouri-Methane) for each month;
  - b. during the first 12 calendar months of operation following the issuance of this permit, the record of the cumulative production rate of all product containers following each calendar month;
  - c. during the first 12 calendar months of operation following the issuance of this permit, the record of the cumulative emissions of OC and ethyl chloride following each calendar month, calculated as required in Section E;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the production rates for each product, and the total production rate for all products combined; and,
  - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the emissions of OC and ethyl chloride calculated as required in Section E.
2. The permit to install for this emissions unit (P001) was evaluated based on the actual materials and the design parameters of the emissions unit's venting system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions

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PTI A

Emissions Unit ID: P001

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unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

- a. Pollutant: Dichlorotetrafluoroethane - 14.4 TPY (max)

TLV (mg/m<sup>3</sup>): 6991

Maximum Hourly Emission Rate (lbs/hr): 9.9

Predicted 1-Hour Maximum Ground-Level  
Concentration (µg/m<sup>3</sup>): 2501

MAGLC (µg/m<sup>3</sup>): 166,500

- b. Pollutant: Ethyl Chloride - 2.94 TPY (max)

TLV (mg/m<sup>3</sup>): 263.9

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level  
Concentration (µg/m<sup>3</sup>): 510.3

MAGLC (µg/m<sup>3</sup>): 6,280

3. Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

Emissions Unit ID: **P001**

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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**PTI A**

Emissions Unit ID: **P001**

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4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (CDAQ) that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels as required in Section B.2.
2. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (CDAQ) that identify all exceedances of the rolling, 12-month emission limitation of ethyl chloride and OC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels of ethyl chloride and OC as required in Section B.2.
3. The quarterly deviation reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and each shall cover the previous calendar quarter, in accordance with the requirements specified in the General Term and Conditions.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

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Facility ID: 1318002664

Emissions Unit ID: P001

- a. Emission Limitation  
11.9 pounds OC per hour

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Emissions Unit ID: P001

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Applicable Compliance Method

Compliance shall be based on the calculation of worst-case emissions below:

Lbs OC/hr = (550 containers/hr) x (206 grams/cont.) x (1 lb/453.6 grams) x (0.04773 lb OC/lb filled)

Where:

206 grams/container for Fluro-Ethyl Cans (worst-case OC emissions)

0.04773 lbs OC/lbs is the emission factor for filling Fluro-Ethyl per production data required by the U.S. FDA

If required, compliance shall be determined through performing testing using U.S. EPA Method 25 or 25A, as appropriate.

b. Emission Limitation

17.3 tons OC per rolling, 12-month period; and  
4.6 tons ethyl chloride (HAPs) per rolling, 12-month period

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements contained in this permit and completion of the following monthly calculations for each product type:

Tons OC/rolling 12 months (for each product filled) =  $\sum \{ [(n \text{ containers filled/rolling 12 months}) \times (X_g \text{ grams/container}) \times (1 \text{ lb/453.6 grams}) \times (X_{ef} \text{ lb OC/lb filled}) \times (1 \text{ ton/2000 lbs})] + [(n \text{ containers filled/rolling 12 months}) \times (X_t \text{ lbs/container}) \times (1 \text{ ton/2000 lbs})] \}$

Tons HAPs/rolling 12 months =  $[(m \text{ containers filled/rolling 12 months}) \times (X_g \text{ grams/container}) \times (1 \text{ lb/453.6 grams}) \times (X_{ef} \text{ lb OC/lb filled}) \times (1 \text{ ton/2000 lbs})] + [(m \text{ containers filled/rolling 12 months}) \times (X_t \text{ lbs/container}) \times (1 \text{ ton/2000 lbs})]$

Where:

$n$  is the number of containers filled for each individual product, as determined from the rolling, 12-month summation of the production rates determined in C.1.

$m$  is the number of containers filled with ethyl chloride, as determined from the rolling,

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PTI A

Emissions Unit ID: **P001**

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12-month summation of the ethyl chloride production rates determined in C.1.

$X_g$  is the number of grams per container:

106 grams/container for Ethyl Chloride

206 grams/container for Fluro-Ethyl

156 grams/container for Flouri-Methane

$X_{ef}$  is the emission factor\* for filling, process

0.01997 lbs OC/lbs filled for Ethyl Chloride

0.04773 lbs OC/lbs filled for Fluro-Ethyl

0.0154 lbs OC/lbs filled for Flouri-Methane

$X_t$  is the emission factor\* for testing for each individual product

0.00111 lbs OC/container for Ethyl Chloride

0.000638 lbs OC/container for Flouri-Methane

\*no testing for Fluro-Ethylx

Then sum the OC emissions for each individual product filled, to determine the total tons OC/rolling 12 month period.

\*Emission factors are derived from production data required by the U.S. FDA.

**F. Miscellaneous Requirements**

None.

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PTI A

Emissions Unit ID: P002

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - British Filler for Vapocoolants (Skin Refrigerants) in Aerosol Delivery Packaging	OAC rule 3745-31-05(A)(3)	15.4 lbs/hr of organic compounds (OC)
	OAC rule 3745-21-07(G)(2)	Exempt; see Section B.1 below
	OAC rule 3745-35-07 (Synthetic Minor PTI to avoid Title V permitting)	5.4 tons per rolling, 12-month period of OC; and see Section B.2 below

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. This emissions unit shall not employ photochemically reactive materials.
2. The maximum annual production rate for this emissions unit shall not exceed 625,000 containers, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production and emission levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u>	<u>Cumulative Pounds OC</u>
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1	52,083 containers	900
1-2	104,167 containers	1,800
1-3	156,250 containers	2,700
1-4	208,333 containers	3,600
1-5	260,416 containers	4,500
1-6	312,498 containers	5,400
1-7	364,583 containers	6,300
1-8	416,666 containers	7,200
1-9	468,750 containers	8,100
1-10	520,833 containers	9,000
1-11	572,916 containers	9,900
1-12	625,000 containers	10,800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling production rate and OC emissions limitation shall be based upon a rolling, 12-month summation of the monthly production rates and OC emissions.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
  - a. the production rate (number of containers filled) for each month;
  - b. during the first 12 calendar months of operation following the issuance of this permit, the record of the cumulative production rate following each calendar month;
  - c. during the first 12 calendar months of operation following the issuance of this permit, the record of the cumulative emissions of OC following each calendar month, calculated as required in Section E;
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the production rate; and,
  - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the emissions of OC calculated as required in Section E.

### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (CDAQ) that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels as required in Section B.2. The quarterly deviation reports shall be submitted by January 31, April 30, July 31, and October

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PTI A

Emissions Unit ID: P002

Issued: To be entered upon final issuance

31 of each year and each shall cover the previous calendar quarter, in accordance with the requirements specified in the General Term and Conditions.

## E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

15.4 pounds OC per hour

Applicable Compliance Method

Compliance shall be based on the calculation of worst-case emissions below:

$$\text{Lbs OC/hr} = (900 \text{ containers/hr}) \times (146 \text{ grams/container}) \times (1 \text{ lb}/453.6 \text{ grams}) \times (0.0533 \text{ lb OC/lb filled})$$

Where:

146 grams/container for Instant Ice

0.0533 lbs OC/lbs is the emission factor for filling Instant Ice, per production data required by the U.S. FDA

If required, compliance shall be determined through performance testing using U.S. EPA Method 25 or 25A, as appropriate.

- b. Emission Limitation

5.4 tons OC per rolling 12 months

Applicable Compliance Method

Compliance shall be determined using the following monthly calculation:

$$\text{Tons OC/rolling 12 months} = (n \text{ containers filled/rolling 12 months}) \times (146 \text{ grams/container}) \times (1 \text{ lb}/453.6 \text{ grams}) \times (0.0533 \text{ lb OC/lb filled}) \times (1 \text{ ton}/2000 \text{ lbs})$$

Where:

**Gebau**

**PTI A**

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*n* is the number of containers filled for Instant Ice per rolling 12 months, as documented in Section C.1.

**F. Miscellaneous Requirements**

None.