



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04296

DATE: 6/29/2004

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

CLAA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 6/29/2004
Effective Date: 6/29/2004**

FINAL PERMIT TO INSTALL 13-04296

Application Number: 13-04296
APS Premise Number: 1318002664
Permit Fee: **\$400**
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

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

Gebauer Company
PTI Application: 13-04296
Issued: 6/29/2004

Facility ID: 1318002664

representative of the

Gebauer Company
PTI Application: 13-04296
Issued: 6/29/2004

Facility ID: 1318002664

Director, upon receipt of a written request and within a reasonable time, any 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 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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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

7

Gebauer Company
PTI Application: 13-04296
Issued: 6/29/2004

Facility ID: 1318002664

permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

Gebauer Company
 PTI Application: 13-04296
 Issued: 6/29/2004

Facility ID: 1318002664

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)	11.9 lbs/hr organic compounds (OC)
	OAC rule 3745-21-07(G)(2)	Exempt, see B.1 below
	OAC rule 3745-35-07 (Synthetic Minor PTI to avoid Title V permitting)	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

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 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/m³): 6991

Maximum Hourly Emission Rate (lbs/hr): 9.9

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 2501

MAGLC (µg/m³): 166,500
- b. Pollutant: Ethyl Chloride - 2.94 TPY (max)

TLV (mg/m³): 263.9

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 510.3

MAGLC (µg/m³): 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;
- 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.).
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:

- a. Emission Limitation

11.9 pounds OC per hour

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

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

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, 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

15

Gebau

PTI A

Issued: 6/29/2004

Emissions Unit ID: **P001**

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.

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>
--------------	--	-----------------------------

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 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:

Lbs OC/hr = (900 containers/hr) x (146 grams/container) x (1 lb/453.6 grams) x (0.0533 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:

Tons OC/rolling 12 months = (n containers filled/rolling 12 months) x (146 grams/container) x (1 lb/453.6 grams) x (0.0533 lb OC/lb filled) x (1 ton/2000 lbs)

Where:

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

F. Miscellaneous Requirements

None.