

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for Campbell Soup Company located in Wood County. The sources listed below shall not exceed the emission limits/ control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source No.</u>	<u>Source Identification/ Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rule</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
R001	Styrofoam Label Adhesive Line	Use of non-photochemically reactive materials, Compliance w/ Ohio EPA Air Toxics Policy, and Compliance w/terms and conditions in this permit.	3745-31-05 3745-21-07 (G)(2)	1.52 lbs OC/hr, 6.66 tons OC/year (*)
R002	Styrofoam Label Adhesive Line	Use of non-photochemically reactive materials, Compliance w/ Ohio EPA Air Toxics Policy, and Compliance w/terms and conditions in this permit.	3745-31-05 3745-21-07 (G)(2)	1.52 lbs OC/hr, 6.66 tons OC/year (*)

* The limits specified in OAC 3745-21-07 (G)(2) are not applicable as long as only non-photochemically reactive materials are employed.

SUMMARY Total Permit to Install Allowable Emissions

<u>Pollutant</u>	<u>Tons/Year</u>
OC	13.32

Additional Special Terms and Conditions

Introduction:

This PTI is for the installation of two syrofoam label adhesive lines.

A. Emissions Limitations and/or Control Requirements

No additional emissions limitations and/or control requirements other than those listed in the Air Emissions Summary.

B. Operational Restrictions

1. This permit allows the use of the coating materials specified by the permittee in the PTI 03-13124 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on coating material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Tetrahydrofuran

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 3.03 (*)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 182.8

MAGLC (ug/m3): 14,047.6

* Note: 100 percent of all solvent is tetrahydrofuran

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

- a. any changes in the composition of the coating materials, or the use of new coating 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 specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

2. The permittee shall only employ non-photochemically reactive materials [as defined in OAC Rule 3745-21-01] in emissions units R001 and R002.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the annual OC emission limits for emissions units R001 and R002, the permittee shall collect and record the following information each month for each emissions unit:
 - a. The name and identification for each adhesive material employed.
 - b. A determination whether or not the adhesive material is photochemically reactive.
 - c. The number of gallons of each adhesive material employed.
 - d. The OC content of each adhesive material in lbs OC/gallon as applied.
 - e. The OC emission rate for each adhesive material in tons/month $[(b \times c)/2000]$
 - f. The total OC emission rate for all adhesive materials, in tons/month [summation of d].
 - g. The annual, year-to-date, OC emissions from all adhesive materials employed, (summation of e for each calendar month to date from January to December).
2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit quarterly written reports for emissions units R001 and R002 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.)
2. The actual annual OC emissions data for the emissions units shall be reported pursuant to the fee emissions report required by OAC 3745-78-02(A).
3. The compliance status of the emissions units shall be reported pursuant to the annual certification required by OAC Rule 3745-77-07 (C)(5).

E. Testing Requirements and/or Compliance Methods Determinations

Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements and Air Emissions Summary of these terms and conditions shall be determined in accordance with the following method(s):

1. a. Emission Limitation

R001 - 1.52 lbs OC/hr

R002 - 1.52 lbs OC/hr

Applicable Compliance Method

The hourly OC limit is based on the emissions units potential-to-emit. Therefore, no short term recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

* The potential-to-emit for each emissions unit was based on a maximum OC content of 7.59 lbs/gallon and a maximum hourly usage rate of 0.2 gallons/hr.

b. Emission Limitation

R001 - 6.66 Tons OC/year

R002 - 6.66 Tons OC/year

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in section C.1.

F. Miscellaneous Requirements

None