



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
HAMILTON COUNTY**

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

**Application No: 14-05588
Fac ID: 1431070730**

DATE: 9/7/2004

Interstate Brands
Jamie Hatfield
747 William Howard Taft Road
Cincinnati, OH 45203

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 **\$1700** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA HCDES Ohio-Kentucky-Indiana Reg Council of Governments KY IN



**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 14-05588

Application Number: 14-05588
Facility ID: 1431070730
Permit Fee: **To be entered upon final issuance**
Name of Facility: Interstate Brands
Person to Contact: Jamie Hatfield
Address: 747 William Howard Taft Road
Cincinnati, OH 45203

Location of proposed air contaminant source(s) [emissions unit(s)]:
**747 West Fifth Street
Cincinnati, Ohio**

Description of proposed emissions unit(s):
P001 and P003 are existing sources. Interstate is requesting that the emissions be combined for a total 94TPY VOC limit.

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

Interstate Brands

Facility ID: 1431070730

PTI Application: 14-05588

Issued: To be entered upon final issuance

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 record keeping 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 record keeping 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

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

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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>
PE/PM ₁₀	0.3
SO ₂	0.024
NO _x	3.88
CO	3.25
VOC	97.12

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>	
P001 - Bun line and oven	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C)
		OAC rule 3745-17-07(A)(1)
	OAC rule 3745-31-02(A)(2)	OAC rule 3745-17-10(C)(1)

Inters:

PTI A

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hour.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(C)(1), and OAC rule 3745-31-05(C).

The following mass emissions are from the products of combustion associated with the oven in this emissions unit:

Particulate emissions (PE) shall not exceed 0.07 ton per year.

Particulate matter with diameters of 10 microns or less (PM₁₀) shall not exceed 0.07 ton per year.

Sulfur dioxide (SO₂) emissions shall not exceed 0.006 ton per year.

Nitrogen oxides (NO_x) emissions shall not exceed 0.92 ton per year.

Carbon monoxide (CO) emissions shall not exceed 0.77 ton per year.

VOC emissions shall not exceed 94 TPY based on a rolling, 12-month summation, for emissions units P001 and P003, combined

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

0.020 lb of particulate emissions (PE)/mmBtu.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the mass and visible emissions limitations.
- 2.b** The hourly emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information:

- a. The amount of buns baked in tons.
- b. The monthly VOC emission factor based on the equation listed below. These records shall list all variables stated in the emission factor equation given below, which shall be used to calculate the VOC emissions:

$$\text{VOC emission factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

VOC emission factor = pounds of VOC per ton of baked buns

Y_i = initial baker's percent of yeast to the nearest tenth of a %

t_i = total yeast action time in hours to the nearest tenth of an hour

S = final (spike) baker's percent of yeast to the nearest tenth of a %

t_s = spiking time in hours to the nearest tenth of an hour.

- c. The monthly VOC emissions, in tons.
- d. The rolling, 12-month summation of the VOC emissions from this emissions unit, in tons.
- e. The rolling, 12-month summation of the VOC emissions from emissions units P001 and P003 combined, in tons.
2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

Interstate Brands

PTI Application: 14-05500

Issued**Facility ID: 1431070730**Emissions Unit ID: **P001**

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services that identify each month during which the VOC emission limit given in section A.1 was exceeded. If no exceedances occurred, the permittee shall state so in the report. If an exceedance occurs the permittee shall list, the cause of the exceedance, corrective action taken to prevent the exceedance in the future, and a summary of the rolling, 12-month summations for VOC emissions for each month. These semi-annual reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

2. Compliance with the TPY VOC emission limitations in section A.1 of this permit shall be determined by the record keeping requirements in section C.1.
3. Compliance with PE/PM₁₀, SO₂, NO_x, and CO emission limitations shall be determined using the emission factors from the 5th Edition of AP-42, Chapter 1.4 - Natural Gas Combustion.
4. Compliance with the operational restriction in section B.1 shall be determined by the record keeping requirements in section C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this PTI supercede the terms and conditions in PTI 14-03152 issued on October 5, 1994.
2. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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Inters

PTI A

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Emissions Unit ID: **P001**

Inters
PTI A

Emissions Unit ID: P003

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>
P003 - Bread line and oven	OAC rule 3745-31-05(A)(3) OAC rule 3745-31-02(A)(2)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-10(C)(1)

**Inters:
PTI A**

Emissions Unit ID: **P003**

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Applicable Emissions
Limitations/Control Measures

Not applicable, see F.2

The following mass emissions are from the products of combustion associated with the oven in this emissions unit:

Particulate emissions (PE) shall not exceed 0.23 ton per year.

Particulate matter with diameters of 10 microns or less (PM₁₀) emissions shall not exceed 0.23 ton per year.

Sulfur dioxide (SO₂) emissions shall not exceed 0.018 ton per year.

Nitrogen oxides (NO_x) emissions shall not exceed 2.96 TPY.

Carbon monoxide (CO) emissions shall not exceed 2.48 TPY.

The following mass emissions are from this emissions unit:

VOC emissions shall not exceed 31 lbs per hour and 78.165 TPY.

The following mass emissions are from emissions units P001 and P003, combined:

VOC emissions shall not exceed 94 TPY based on a rolling, 12-month summation.

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

0.020 lb of particulate emissions (PE)/mmBtu.

2. Additional Terms and Conditions

- 2.a** The hourly emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

- 1.** The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Record keeping Requirements

- 1.** The permittee shall maintain monthly records of the following information:

- a. The amount of bread baked in tons.
- b. The monthly VOC emission factor based on the equation listed below. These records shall list all variables stated in the emission factor equation given below, which shall be used to calculate the VOC emissions:

$$\text{VOC emission factor} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

VOC emission factor = pounds of VOC per ton of baked bread

Y_i = initial baker's percent of yeast to the nearest tenth of a %

t_i = total yeast action time in hours to the nearest tenth of an hour

S = final (spike) baker's percent of yeast to the nearest tenth of a %

t_s = spiking time in hours to the nearest tenth of an hour.

- c. The monthly VOC emissions, in tons
- d. The rolling, 12-month summation of the VOC emissions from this emissions unit, in tons.
- e. The rolling, 12-month summation of the VOC emissions from emissions unit P001 and P003 combined, in tons.
- 2.** For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

- 1.** The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services that identify each month during which the VOC emissions limits given in

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section A.1 were exceeded. If no exceedances occurred, the permittee shall state so in the report. If an exceedance occurs the permittee shall list, the cause of the exceedance, corrective action taken to prevent the exceedance in the future, and a summary of the rolling, 12-month summations for VOC emissions for each month. These semi-annual reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

2. Compliance with the TPY VOC emission limitations in section A.1 of this permit shall be determined by the record keeping requirements in section C.1.
3. Compliance with PE/PM₁₀, SO₂, NO_x, and CO emission limitations shall be determined using the emission factors from the 5th Edition of AP-42, Chapter 1.4 - Natural Gas Combustion.
4. Compliance with the operational restriction in section B.1 shall be determined by the record keeping requirements in section C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this PTI supercede the terms and conditions in PTI 14-03152 issued on October 5, 1994.
2. The permittee submitted a Permit to Operate application for this emissions unit while bakery ovens were still exempt from the requirement to obtain a Permit to Install. Since the unit was exempt from the requirement to obtain a Permit to Install, Best Available Technology is not required to be met.

Interstate Brands
PTI Application: 14-05500
Issued

Facility ID: 1431070730

Emissions Unit ID: **P003**

3. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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>
P004 - Lubrication of bakery oven chains	OAC rule 3745-31-02(A)(2)	VOC emissions shall not exceed 120 lbs/week and 3.12 TPY. See terms A.2.a, A.2.b, and B.1.

2. Additional Terms and Conditions

- 2.a The volatile organic compound (VOC) content of each oven chain lubricant employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon, as applied.
- 2.b The weekly emissions limitation is based on the emissions unit's potential to emit. Therefore, no weekly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The maximum annual chain lubricant usage for this emissions unit shall not exceed 1040 gallons.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The name and identification number of each oven chain lubricant employed.
 - b. The volume, in gallons, of each oven chain lubricant employed.
 - c. The total volume, in gallons, of all oven chain lubricants employed.

Inters:
PTI A

Emissions Unit ID: **P004**

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- d. The VOC content of each oven chain lubricant, in pounds per gallon, as applied.
- e. The total VOC emission rate for all oven chain lubricants employed, in pounds per month (b x d).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that emissions unit P004 employed oven chain lubricants that exceeded the applicable maximum VOC content limitation outlined in term A.2.a. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the end of the month in which the exceedance(s) occurred. For each VOC content limitation exceedance, the permittee shall also identify if an exceedance of the applicable VOC emissions limitation occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that emissions unit P004 employed oven chain lubricants that exceeded the applicable maximum oven chain lubricants usage limitation outlined in term B.1. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the end of the month in which the exceedance(s) occurred. For each usage limitation exceedance, the permittee shall also identify if an exceedance of the applicable VOC emissions limitations occurred.

E. Testing Requirements

1. Compliance with the emission limitations and VOC content limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
120 lbs/week VOC

Applicable Compliance Method:
Compliance can be demonstrated by multiplying the maximum VOC content limit for coatings identified in term A.2.a, 6.0 lbs/gal, by the maximum coating application rate, 1040 gallons/year and then dividing this number by 52 weeks/year.
 - b. Emission Limitation:
3.12 TPY VOC

Applicable Compliance Method:
Compliance with the above emission limitation may be demonstrated by summing the

Inters**PTI A**Emissions Unit ID: **P004****Issued: To be entered upon final issuance**

VOC emissions in lbs/month required pursuant to Section C.1.e. and then dividing this number by 2000 lb/ton.

- c. Emission Limitations:
6.0 pounds of VOC per gallon of oven chain lubricant

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the inks and coatings.

2. Compliance with the oven chain lubricant usage limitation in Section B.1 of these terms and conditions shall be determined by the record keeping requirements as specified in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.