

94-mWH-087



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Secretary

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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

FILE CODE: 4530-1  
FID# 252006370

June 1, 1995

Mr. Nico J. Meiland  
S.C. Johnson & Sons, Inc.  
1525 Howe St.  
Racine, WI 53403-5011

Dear Mr. Meiland:

Your application for an air pollution control construction permit has been processed in accordance with sec. 144.392, Wis. Stats.

The enclosed permit is issued to provide authorization for your source to construct and initially operate in accordance with the requirements and conditions set forth within Parts I and II of the permit. Please read it carefully. This permit expires 36 months after the day this permit is issued. The source(s) covered in this permit may not operate after this permit expires unless you have been issued an operating permit.

Enclosed with the permit there is a bill for the cost of reviewing and acting upon your air pollution control permit. This bill is due and payable within 30 days of the date of the issuance of the permit. The remittance should be made payable to Wisconsin Department of Natural Resources and returned to the address on the bill. Please return one copy of the bill with your payment.

A copy of this permit should be available at the source for inspection by any authorized representative of the Department. Questions about this permit should be directed to the Department of Natural Resources, Southeast District, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8594.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes establish time periods within which requests to review Department decisions must be filed.

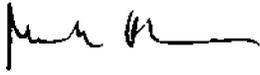
To request a contested case hearing pursuant to s. 144.403, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for a contested case hearing on the Secretary of the Department of Natural Resources. Any such petition for hearing shall set forth specifically the issue sought to be reviewed, the interest of the petitioner, the reasons why a hearing is warranted and the relief desired.



For judicial review of a decision pursuant to ss. 227.52 and 227.53, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

This notice is provided pursuant to s. 227.48(2), Stats.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES



Mark Harder, Review Engineer  
Permit Section  
Bureau of Air Management

Enclosure

cc: Air Enforcement Branch - EPA, Region V  
Southeast District Air Program

BEFORE THE DEPARTMENT OF NATURAL RESOURCES  
BUREAU OF AIR MANAGEMENT  
FINDINGS OF FACT  
CONCLUSIONS OF LAW  
AND DECISION

Findings of Fact

The Department of Natural Resources (DNR) finds that:

- 1) S.C. Johnson & Sons, Inc., 2512 Willow Rd., Mount Pleasant, Wisconsin, has applied for an air pollution control construction permit. The authorized representative of the facility is Mr. Nico J. Meiland, VP US Manufacturing Division.
- 2) S.C. Johnson & Sons, Inc. submitted an air pollution control permit application and plans and specifications and any additional information describing the air pollution source on November 2, 4, 10, 11, 18, 25, 1994; February 2, 15; March 6, 1995.
- 3) DNR has reviewed S.C. Johnson & Sons, Inc.'s air permit application and the plans and specifications submitted to DNR.
- 4) This permit is for the construction of air pollution sources.
- 5) DNR has complied with the procedures set forth in s. 144.392, Stats.
- 6) The proposed air pollution source meets all of the applicable criteria in s. 144.393, Stats.
- 7) DNR has complied with the requirements of s. 1.11, Stats., and ch. NR 150, Wis. Adm. Code.

Conclusions of Law

DNR concludes that:

- 1) DNR has authority under s. 144.31(1)(a), Stats., to promulgate rules contained in chs. NR 400-499, Wis. Adm. Code, including but not limited to rules containing emission limits, compliance schedules and compliance determination methods.
- 2) DNR has the authority under ss. 144.31(1)(a), (e), and (f), 144.375 (4) and (5) and 144.394, Stats., and chs. NR 400-499, Wis. Adm. Code, to establish emission limits for sources of air pollution.
- 3) DNR has the authority to issue air pollution control permits and to include conditions in such permits under ss. 144.391, 144.392, 144.393 and 144.394, Stats.
- 4) The emission limits included in this permit are authorized by ss. 144.394, Stats., and NR 400 to 499, Wis. Adm. Code.
- 5) DNR is required to comply with s. 1.11, Stats., and ch. NR 150, Wis. Adm. Code, in conjunction with issuing an air pollution control permit.

Decision

S.C. Johnson & Sons, Inc. is authorized to construct three aerosol can product filling operations, three through-the-valve aerosol can propellant filling operations, one pilot scale product filling operation and one pilot scale through-the-valve aerosol can propellant filling operation and six fixed roof storage tanks as described in plans and specifications dated November 2, 4, 10, 11, 18, 25, 1994; February 2, 15; March 6, 1995 in conformity with the emission limits, monitoring, recordkeeping and reporting requirements and specific and general conditions set forth in this permit.

AIR POLLUTION CONTROL CONSTRUCTION PERMIT

EI FACILITY NO. 252006370

PERMIT NO. 94-MWH-087

STACK NO.(S). S51, S70, S52, S63, S54, S64,  
S66, S67, S71

SOURCE NO.(S). P35, P60, P36,  
P63, P38, P64, P66, P67, T01, T02

THIS CONSTRUCTION PERMIT EXPIRES THIRTY-SIX (36) MONTHS FROM THE DATE OF ISSUANCE.

In compliance with the provisions of Chapter 144, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: S.C. Johnson & Sons, Inc.

Street Address: 2512 Willow Rd.  
Mount Pleasant, Wisconsin

Principal Officer or Authorized Representative, & Title:  
Mr. Nico J. Meiland, VP US Manufacturing Division

is authorized to construct three aerosol can product filling operations, three through-the-valve aerosol can propellant filling operations, one pilot scale product filling operation and one pilot scale through-the-valve aerosol can propellant filling operation and six fixed roof storage tanks described in the plans and specifications dated November 2, 4, 10, 11, 18, 25, 1994; February 2, 15; March 6, 1995 in conformity with the conditions herein.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Madison, Wisconsin this 1st day of June 1995.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES  
For the Secretary

By Donald F. Theiler DSP  
Donald F. Theiler, Director  
Bureau of Air Management

PART I  
SPECIFIC PERMIT CONDITIONS

**A. APPLICABLE LIMITATIONS**

**I. P35, S51: Aerosol Propellant Filling for Line 360**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
Volatile organic compounds (VOC)	s. NR 408.04(3), Wis. Adm. Code	Lowest Achievable Emission Rate (LAER) and 0.538 lbs VOC/1,000 cans See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity from each stack

Note 1: LAER for this process has been determined to be the use of a "through-the-valve" filling system.

Specific Conditions Applicable to P35, S51

1. a. The production rate may not exceed 13,375,000 cans filled with propellant per month, as determined by an average over any 12 consecutive months. (s. 144.394(7), Stats.)  
b. For the first 12 months of operation, the production rate may not exceed 13,375,000 cans filled in any month. (s. 144.394(7), Stats.)
2. The permittee shall keep and maintain daily records of total cans filled with propellant. The records shall be compiled on a monthly basis to demonstrate compliance with condition 1. (s. NR 439.04(1)(d), Wis. Adm. Code)

Note: conditions 1 and 2 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

3. Compliance Demonstration

Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the volatile organic compound emission limit using U.S. EPA Method 25A while operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve in writing an extension of time to conduct the test(s). The Department shall be informed at least 20 working days prior to the tests so a Department representative can witness the testing. At the time of notification a compliance test plan following the provisions set forth in Section NR 439.07, Wis. Adm. Code, shall also be submitted for approval.

Two copies of the report on the tests shall be submitted to the Department for evaluation within 60 days after the tests. An operation permit will be issued only upon proof of compliance. (s. NR 439.03, Wis. Adm. Code)

4. The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any propellant material used. (s. NR 439.04(1)(d), Wis. Adm. Code)
5. The permittee shall keep and maintain on site the operator's manual for the "through-the-valve" propellant filling system. (s. NR 408.04(3), Wis. Adm. Code)
6.
  - a. The permittee shall do a visual inspection of the gas house and record all gas monitor (LEL monitor) readings in the gas house at least once per day. An acceptable operating range shall be established in the operation permit. (s. NR 439.04(1)(d), Wis. Adm. Code)
  - b. The gas house monitors shall be calibrated yearly or at a frequency based on good engineering practice as established by operational frequency, whichever is more frequent. (s. NR 439.055(4), Wis. Adm. Code)
  - c. Any malfunctions or operator concerns shall be noted in a log or checklist. (s. NR 439.04(1)(d), Wis. Adm. Code)

**II. P60, S70: Product Filling for Line 360**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
VOC	s. NR 408.04(3), Wis. Adm. Code	LAER and 300.0 pounds of VOC per month as determined by an average over 12 consecutive months See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity

Note 1: LAER for this process has been determined to be good operating practices.

Specific Conditions Applicable to P60, S70

1.
  - a. The permittee shall keep and maintain daily records of the number of aerosol cans filled and the size of each aerosol can.
  - b. The permittee shall keep and maintain daily records of the type and amount of material (product) that is put into the aerosol cans.
  - c. The permittee shall keep and maintain records of the molecular weight of the vapor and vapor pressure of the product.

d. The permittee shall calculate the emission factor using the following formula:

$$L_L = 12.46 \text{ SPM/T}$$

where:

- $L_L$  is the loading loss in units of lbs of VOC per 1,000 gallons of product loaded
- S is the saturation factor (0.5 or 0.05 for emulsion products)
- P is the true vapor pressure of the product loaded (psia)
- M is the molecular weight of the vapor (lb/lb-mole)
- T is the temperature of the bulk liquid loaded ( $^{\circ}$ R)

e. The permittee shall calculate monthly VOC emissions using the emission factor determined for each product and the amount of each type of product loaded.

(s. NR 439.04(1)(d), Wis. Adm. Code)

2. The emission rate of VOCs may not exceed 300.0 pounds per month, as determined by an average over any 12 consecutive months. (s. NR 408.04(3), Wis. Adm. Code)
3. For the first 12 months of operation, the emission rate of VOCs may not exceed 300.0 pounds in any month. (s. NR 408.04(3), Wis. Adm. Code)

Note: conditions 1 to 3 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

#### 4. Compliance Demonstration

Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the volatile organic compound emission limit using U.S. EPA Method 25A while operating at 100% capacity. The calculated emission rate shall be determined and reported for the time period covered by the stack test. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve in writing an extension of time to conduct the test(s). The Department shall be informed at least 20 working days prior to the tests so a Department representative can witness the testing. At the time of notification a compliance test plan following the provisions set forth in Section NR 439.07, Wis. Adm. Code, shall also be submitted for approval.

Two copies of the report on the tests shall be submitted to the Department for evaluation within 60 days after the tests. An operation permit will be issued only upon proof of compliance. (s. NR 439.03(1)(a), Wis. Adm. Code)

5. The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any product material used. (s. NR 439.04(1)(d), Wis. Adm. Code)

**III: P36, S52: Aerosol Propellant Filling for Line 363**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
Volatile organic compounds (VOC)	s. NR 408.04(3), Wis. Adm. Code	Lowest Achievable Emission Rate (LAER) and 0.538 lbs VOC/1,000 cans See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity from each stack

Note 1: LAER for this process has been determined to be the use of a "through-the-valve" filling system.

Specific Conditions Applicable to P36, S52

1. a. The production rate may not exceed 13,375,000 cans filled with propellant per month, as determined by an average over any 12 consecutive months. (s. 144.394(7), Stats.)  
b. For the first 12 months of operation, the production rate may not exceed 13,375,000 cans filled in any month. (s. 144.394(7), Stats.)
2. The permittee shall keep and maintain daily records of total cans filled with propellant. The records shall be compiled on a monthly basis to demonstrate compliance with condition 1. (s. NR 439.04(1)(d), Wis. Adm. Code)

Note: conditions 1 and 2 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

3. The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any propellant material used. (s. NR 439.04(1)(d), Wis. Adm. Code)
4. The permittee shall keep and maintain on site the operator's manual for the "through-the-valve" propellant filling system. (s. NR 408.04(3), Wis. Adm. Code)
5. a. The permittee shall do a visual inspection of the gas house and record all gas monitor (LEL monitor) readings in the gas house at least once per day. An acceptable operating range shall be established in the operation permit. (s. NR 439.04(1)(d), Wis. Adm. Code)  
b. The gas house monitors shall be calibrated yearly or at a frequency based on good engineering practice as established by operational frequency, whichever is more frequent. (s. NR 439.055(4), Wis. Adm. Code)  
c. Any malfunctions or operator concerns shall be noted in a log or checklist. (s. NR 439.04(1)(d), Wis. Adm. Code)

**IV. P63, S63: Product Filling for Line 363**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
VOC	s. NR 408.04(3), Wis. Adm. Code	LAER and 300.0 pounds of VOC per month as determined by an average over 12 consecutive months See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity

Note 1: LAER for this process has been determined to be good operating practices.

Specific Conditions Applicable to P63, S63

1. a. The permittee shall keep and maintain daily records of the number of aerosol cans filled and the size of each aerosol can.
- b. The permittee shall keep and maintain daily records of the type and amount of material (product) that is put into the aerosol cans.
- c. The permittee shall keep and maintain records of the molecular weight of the vapor and vapor pressure of the product.
- d. The permittee shall calculate the emission factor using the following formula:

$$L_L = 12.46 \text{ SPM/T}$$

where:

- $L_L$  is the loading loss in units of lbs of VOC per 1,000 gallons of product loaded
- S is the saturation factor (0.5 or 0.05 for emulsion products)
- P is the true vapor pressure of the product loaded (psia)
- M is the molecular weight of the vapor (lb/lb-mole)
- T is the temperature of the bulk liquid loaded (°R)

- e. The permittee shall calculate monthly VOC emissions using the emission factor determined for each product and the amount of each type of product loaded.  
(s. NR 439.04(1)(d), Wis. Adm. Code)

2. The emission rate of VOCs may not exceed 300.0 pounds per month, as determined by an average over any 12 consecutive months. (s. NR 408.04(3), Wis. Adm. Code)
3. For the first 12 months of operation, the emission rate of VOCs may not exceed 300.0 pounds in any month. (s. NR 408.04(3), Wis. Adm. Code)

Note: conditions 1 to 3 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

4. The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any product material used. (s. NR 439.04(1)(d), Wis. Adm. Code)

**V. P38, S54: Aerosol Propellant Filling for Line 364**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
Volatile organic compounds (VOC)	s. NR 408.04(3), Wis. Adm. Code	Lowest Achievable Emission Rate (LAER) and 0.538 lbs VOC/1,000 cans See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity from each stack

Note 1: LAER for this process has been determined to be the use of a "through-the-valve" filling system.

Specific Conditions Applicable to P38, S54

1.
  - a. The production rate may not exceed 13,375,000 cans filled with propellant per month, as determined by an average over any 12 consecutive months. (s. 144.394(7), Stats.)
  - b. For the first 12 months of operation, the production rate may not exceed 13,375,000 cans filled in any month. (s. 144.394(7), Stats.)
2. The permittee shall keep and maintain daily records of total cans filled with propellant. The records shall be compiled on a monthly basis to demonstrate compliance with condition 1. (s. NR 439.04(1)(d), Wis. Adm. Code)

Note: conditions 1 and 2 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

3. The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any propellant material used. (s. NR 439.04(1)(d), Wis. Adm. Code)
4. The permittee shall keep and maintain on site the operator's manual for the "through-the-valve" propellant filling system. (s. NR 408.04(3), Wis. Adm. Code)
5.
  - a. The permittee shall do a visual inspection of the gas house and record all gas monitor (LEL monitor) readings in the gas house at least once per day. An acceptable operating range shall be established in the operation permit. (s. NR 439.04(1)(d), Wis. Adm. Code)
  - b. The gas house monitors shall be calibrated yearly or at a frequency based on good engineering practice as established by operational frequency, whichever is more frequent. (s. NR 439.055(4), Wis. Adm. Code)
  - c. Any malfunctions or operator concerns shall be noted in a log or checklist. (s. NR 439.04(1)(d), Wis. Adm. Code)

**VI. P64, S64: Product Filling for Line 364**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
VOC	s. NR 408.04(3), Wis. Adm. Code	LAER and 178.3 pounds of VOC per month as determined by an average over 12 consecutive months See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity

Note 1: LAER for this process has been determined to be good operating practices.

Specific Conditions Applicable to P64, S64

1. a. The permittee shall keep and maintain daily records of the number of aerosol cans filled and the size of each aerosol can.
- b. The permittee shall keep and maintain daily records of the type and amount of material (product) that is put into the aerosol cans.
- c. The permittee shall keep and maintain records of the molecular weight of the vapor and vapor pressure of the product.
- d. The permittee shall calculate the emission factor using the following formula:

$$L_L = 12.46 \text{ SPM/T}$$

where:

- $L_L$  is the loading loss in units of lbs of VOC per 1,000 gallons of product loaded
- S is the saturation factor (0.5 or 0.05 for emulsion products)
- P is the true vapor pressure of the product loaded (psia)
- M is the molecular weight of the vapor (lb/lb-mole)
- T is the temperature of the bulk liquid loaded (°R)

- e. The permittee shall calculate monthly VOC emissions using the emission factor determined for each product and the amount of each type of product loaded.  
(s. NR 439.04(1)(d), Wis. Adm. Code)
2. The emission rate of VOCs may not exceed 178.3 pounds per month, as determined by an average over any 12 consecutive months. (s. NR 408.04(3), Wis. Adm. Code)
3. For the first 12 months of operation, the emission rate of VOCs may not exceed 178.3 pounds in any month. (s. NR 408.04(3), Wis. Adm. Code)

Note: conditions 1 to 3 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

4. The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any product material used. (s. NR 439.04(1)(d), Wis. Adm. Code)

**VII. P66, S66: Pilot Plant North Line: Through-the-Valve Aerosol Propellant Filling Operation**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
Volatile organic compounds (VOC)	s. NR 408.04(3), Wis. Adm. Code	Lowest Achievable Emission Rate (LAER) and 0.538 lbs VOC/1,000 cans See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity from each stack

Note 1: LAER for this process has been determined to be the use of a "through-the-valve" filling system.

Specific Conditions Applicable to P66, S66

1.
  - a. The production rate may not exceed 160,000 cans filled with propellant per month, as determined by an average over any 12 consecutive months. (s. 144.394(7), Stats.)
  - b. For the first 12 months of operation, the production rate may not exceed 160,000 cans filled in any month. (s. 144.394(7), Stats.)
2. The permittee shall keep and maintain daily records of total cans filled with propellant. The records shall be compiled on a monthly basis to demonstrate compliance with condition 1. (s. NR 439.04(1)(d), Wis. Adm. Code)

Note: conditions 1 and 2 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

3. The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any propellant material used. (s. NR 439.04(1)(d), Wis. Adm. Code)
4. The permittee shall keep and maintain on site the operator's manual for the "through-the-valve" propellant filling system. (s. NR 408.04(3), Wis. Adm. Code)
5.
  - a. The permittee shall do a visual inspection of the gas house and record all gas monitor (LEL monitor) readings in the gas house at least once per day. An acceptable operating range shall be established in the operation permit. (s. NR 439.04(1)(d), Wis. Adm. Code)

b. The gas house monitors shall be calibrated yearly or at a frequency based on good engineering practice as established by operational frequency, whichever is more frequent. (s. NR 439.055(4), Wis. Adm. Code)

c. Any malfunctions or operator concerns shall be noted in a log or checklist. (s. NR 439.04(1)(d), Wis. Adm. Code)

**VIII. P67, S67: Product Filling for the Pilot Plant, North Line**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
VOC	s. NR 408.04(3), Wis. Adm. Code	LAER and 0.05 pounds of VOC per 1000 cans filled See Note 1
Visible emissions	s. NR 431.05, Wis. Adm. Code	20 percent opacity

Note 1: LAER for this process has been determined to be good operating practices.

Specific Conditions Applicable to P67, S67

- The production rate may not exceed 160,000 cans filled with product per month, as determined by an average over any 12 consecutive months. (s. 144.394(7), Stats.)
  - For the first 12 months of operation, the production rate may not exceed 160,000 cans filled in any month. (s. 144.394(7), Stats.)
- The permittee shall keep and maintain daily records of total cans filled with product. The records shall be compiled on a monthly basis to demonstrate compliance with condition 1. (s. NR 439.04(1)(d), Wis. Adm. Code)

Note: conditions 1 and 2 are included to establish the potential to emit VOCs from the project; offsets are required for this project at a ratio of 1.3 to 1 based on the potential to emit.

- The permittee shall keep and maintain on site a copy of a Material Safety Data Sheet (MSDS) for any product material used. (s. NR 439.04(1)(d), Wis. Adm. Code)

**EX: T01: Two (2) Identical 20,000 Gallon Storage Tanks. For each tank:**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
VOC	s. NR 408.04(3), Wis. Adm. Code	LAER and 90% destruction of VOCs vented through stack S71 See Note 1

Note 1: LAER for each tank has been determined to be the use of a catalytic incineration system and the use of a submerged fill pipe. A "submerged fill pipe" is a fill pipe with a discharge opening is entirely submerged when the liquid level is 6 inches above the tank bottom.

Specific Conditions Applicable to T01

1. For each tank, the permittee shall keep and maintain records showing the dimensions of the storage vessel and the design of the submerged fill pipe. These records shall be kept for the life of the equipment. (s. NR 440.285(7)(a) and (b) and s. NR 439.04(1)(d), Wis. Adm. Code)
2. For each tank, the permittee shall keep and maintain records of the compound stored, the period of storage and the maximum true vapor pressure of the compound during the storage period. (s. NR 440.285(7)(c), Wis. Adm. Code)
3. The pressure relief vents shall be controlled by a catalytic incineration system. (s. NR 408.04(3), Wis. Adm. Code)
4.
  - a. The permittee shall monitor and record the temperature before and after the catalyst bed on a continuous basis. (s. NR 439.03, Wis. Adm. Code)
  - b. The outlet temperature of the catalyst bed may not be less than 700°F, as determined by a one hour average. (s. 144.304(3), Stats.)
  - c. The temperature monitoring devices shall each have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or  $\pm 5^\circ\text{F}$  of the temperature being measured, or the equivalent in degrees Centigrade, whichever is greater. (s. NR 439.055(3)(a), Wis. Adm. Code)
  - d. The temperature monitoring devices shall be calibrated yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. (s. NR 439.055(4), Wis. Adm. Code)

**X. T02: Four (4) Identical 10,000 Gallon Storage Tanks. For each tank:**

<u>Pollutant</u>	<u>Applicable Wis. Adm. Code or Wis. Statute</u>	<u>Limitation/Requirement</u>
VOC	s. NR 408.04(3), Wis. Adm. Code	LAER and 90% destruction of VOCs vented through S71 See Note 1

Note 1: LAER for each tank has been determined to be the use of a catalytic incineration system and the use of a submerged fill pipe. A "submerged fill pipe" is a fill pipe with a discharge opening is entirely submerged when the liquid level is 6 inches above the tank bottom.

Specific Conditions Applicable to T02

1. For each tank, the permittee shall keep and maintain records showing the dimensions of the storage vessel and the design of the submerged fill pipe. These records shall be kept for the life of the equipment. (s. NR 439.04(1)(d), Wis. Adm. Code)
2. The pressure relief vents shall be controlled by a catalytic incineration system. (s. NR 408.04(3), Wis. Adm. Code)
3.
  - a. The permittee shall monitor and record the temperature before and after the catalyst bed on a continuous basis. (s. NR 439.03, Wis. Adm. Code)
  - b. The outlet temperature of the catalyst bed may not be less than 700°F, as determined by a one hour average. (s. 144.304(3), Stats.)
  - c. The temperature monitoring devices shall each have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or  $\pm 5^\circ\text{F}$  of the temperature being measured, or the equivalent in degrees Centigrade, whichever is greater. (s. NR 439.055(3)(a), Wis. Adm. Code)
  - d. The temperature monitoring devices shall be calibrated yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. (s. NR 439.055(4), Wis. Adm. Code)

## **XI. Total Facility**

### **Specific Conditions Applicable to the Total Facility**

1. The applicable requirements and conditions for the construction and operation of the Pilot Plant's North Line (designated as P66 and P67 in this permit) included in permit # MIN-10-SJK-81-52-048 are superseded. (s. 144.394(7), Stats.)
2. If the construction on any emission unit included in this permit is not commenced within 18 months of the issuance date of this permit, the permittee shall review and modify, as appropriate, the lowest achievable emission rate (LAER) analysis for the unit on which construction has not commenced. The permittee's LAER review shall be submitted to the Department at least 2 months, but no more than 18 months, prior to commencing construction. (s. NR 408.04(4), Wis. Adm. Code)

### **B. GENERAL PERMIT CONDITIONS**

1. The permittee shall inform the Wisconsin Department of Natural Resources, Southeast District, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8594, in writing of the following for the emissions unit covered in this permit:
  - a. Notice of commencing construction shall be submitted within 15 days of the start of construction.
  - b. Notice of intent to initially operate the source(s) covered by this permit, 30 days prior to the anticipated date of initial operation.
  - c. Notice of the actual date of initial startup shall be submitted within 15 days of the initial startup.

(s. NR 439.03(1), Wis. Adm. Code)

#### **2. Expiration of This Construction Permit**

This construction permit expires 36 months after the date of issuance. Construction or modification and an initial operation period for equipment shakedown, testing and Department evaluation of operation to assure conformity with the permit conditions is authorized for each emissions unit covered in this permit. Please note that the sources covered by this permit are required to meet all emission limits and conditions contained in the permit at all times, including during the initial operation period. Compliance information needed to complete the operation permit shall be submitted prior to the expiration of this construction permit. If 36 months is an insufficient time period for construction or modification, equipment shakedown, testing and Department evaluation of operation, the permit holder may request and the Department may approve in writing an extension of this permit. Permanent operation of the source(s) covered by this permit after this permit expires is prohibited until an operating permit for the source(s) has been issued by the Department.

(s. 144.396(1), Wis. Stats.)

3. Whenever emission testing is required by the Department, the following test methods shall be employed:
  - a. Compliance with visible emission limits shall be determined by methods described in sec. NR 439.06(9), Wis. Adm. Code.
  - b. Compliance with total organic compound emission limits shall be determined by U.S. EPA Method 25A.