TECHNICAL REVIEW DOCUMENT
OPERATING PERMIT 95OPJE053
to be issued to:

Rocky Mountain Bottle Company
Jefferson County
Source ID 0590008

Prepared by Geoffrey D. Drissel
July 9, 2001

I. Purpose:

This document establishes the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered within the operating permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA, the Public and other interested parties. The conclusions made in this report are based on information provided in the original application submittal of March 1, 1995 and a resubmittal of June 24, 1997. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

On April 16, 1998 the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/ throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard, by a specific State SIP requirement or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison to annual emission limits unless there is a specific condition in the permit restricting hours of operation.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit

incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

The Rocky Mountain Bottle Company (RMBC) facility is classified as a container glass manufacturing facility defined under Standard Industrial Classification 3221. The facility produces container glass at a maximum rate of 365,000 tons per year. The glass is produced from raw materials, such as sand, limestone and soda ash, as well as recycled glass known as cullet. The major processing steps consist of raw materials handling, melting, glass forming and container finishing. The plant equipment includes materials storage silos, screens and mixers, recycled glass crushers, melting furnaces, glass forming machines and container coating equipment. Assembly and printing of cardboard boxes for the containers also adds to the emissions from the facility.

The facility is located in Wheat Ridge, west of Denver, in Jefferson County. It is located within 100 kilometers of Rocky Mountain National Park and Eagle's Nest National Wilderness Area.

The area in which the plant operates is designated as non-attainment for PM_{10} and carbon monoxide. Although the Denver metropolitan area was previously designated non-attainment for the 1-hour ozone standard, this standard was revoked in June of 1998. However, all SIP-approved requirements continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act.

A July 20, 2000 Federal Register (see 65 Fed. Reg. 45182) indicated that the 1-hour ozone non-attainment designation will be reinstated on January 16, 2001. In addition, based on preliminary data, it appears that Denver recently violated the new 8 hour ozone standard, and it is the Division's understanding that EPA will issue a non-attainment designation Federal Register notice for the Metro area even though the EPA's ability to implement the standard itself is under judicial review as of the issuance date of this permit.

This source is major, but has not yet had to go through Prevention of Significant Deterioration (PSD) review or non-attainment New Source Review (NSR). Future modifications at the facility which trigger significance levels for the

pollutants as defined in Colorado Regulation No. 3, Part A, Section I.B.57 will require that PSD or non-attainment NSR requirements be met. In the Denver PM_{10} non-attainment area, NOx and SO_2 are considered precursors of PM_{10}. Facility-wide potential and actual emissions are as follows:

Pollutant	Potential to Emit (tpy)	Actual 1999 Emissions (tpy)
NOx	424.0	337.0
VOC	61.4	41.5
CO	61.5	43.3
SO_2	368.8	294.8
PM_{10}	47.2	71.0

Potential emissions are taken from the construction permits for this facility, as modified by the NSPS particulate limit for the furnaces. Actual emissions are taken from emissions documented in the July 7, 2000 Division inspection report for this facility. The Division assumes that emissions from the facility have remained the same or decreased from the levels listed above.

The applicant certified that the facility was in compliance with all applicable requirements at the time of application submittal. The applicant also indicated that the facility is not subject to 112(r), the Accidental Release Prevention Program of the Federal Clean Air Act. There are currently no Maximum Achievable Control Technology (MACT) standards applicable to this facility.

The emission limits contained in the Construction Permit for the three furnaces at this facility are included in the Colorado PM_{10} SIP. The effect of this inclusion is that the emission limits specified in the referenced Construction Permit cannot be increased without revising the SIP. In addition, any short term limits contained in the referenced Construction Permit that are relevant to the PM_{10} SIP must be incorporated into the Operating Permit.

III. Emission Sources:

The following sources are specifically regulated under terms and conditions of the operating permit for this Site:

<u>Unit P001</u>-KTG Glass Melting Furnaces (#1, #2 and #3)

Discussion:

1. Applicable Requirements- Prior to Title V application submittal, Colorado Construction Permit 92JE129-1 defined applicable requirements for these furnaces. Revisions to the existing permit limits were not requested by the applicant. The terms contained in the existing Construction Permit are as follows:

Parameter	Short Term Limit	Long Term Limit
NOx	96.8 lbs/hr	424.0 tons/yr
VOC	8.77 lbs/hr	38.4 tons/yr
CO	13.88 lbs/hr	60.8 tons/yr
SO_2	82.65 lbs/hr	362.0 tons/yr
PM_{10}	22.6 lbs/hr	99.0 tons/yr
Particulate	22.6 lbs/hr	99.0 tons/yr
Production	1,000 tons/day	365,000 tons/yr

Construction Permit 92JE129-1 also established these furnaces as being subject to NSPS Subpart CC, including limitations on the furnace exhaust gas particulate concentration (0.5 g/kg glass produced) applicable to a furnace "with modified processes". In June 1997, RMBC determined that the furnaces are actually "without modified processes" and are consequently subject to a stricter standard (0.1 g/kg glass produced). The particulate and PM_{10} emission limitations incorporated into the Operating Permit (8.33 lbs/hr, 36.5 tpy) will reflect the stricter standard. In addition, the appropriate limitations and recordkeeping and reporting requirements contained in Subpart CC have been incorporated into the draft Operating Permit.

Construction Permit 92JE129-1 also established the requirement for Continuous Emission Monitors to measure NOx and SO_2 emissions from the furnaces. It also lists a requirement for particulate control equipment. Both of these conditions have been incorporated into the Operating Permit. This permit also established a requirement for continuous monitoring of opacity from the furnace discharge. However, because the furnaces were determined to be "without modified processes", a letter was sent to RMBC on May 15, 1998 stating that no opacity monitoring is required for this source. Thus, the requirement for continuous opacity monitoring will not be included in the Operating Permit.

As stated previously, because this permit has been included in the SIP,

the short term limits, modified to reflect the NSPS limit, will be incorporated into the Operating Permit, except for CO and VOC which are not relevant to the PM_{10} SIP. The Regulation No. 1 process weight rate particulate limit will not be included as an applicable requirement because the NSPS standard is a more stringent short term limit. The annual emission limitations and production limitation listed above and the 20% opacity limit will also be incorporated into the Operating Permit.

2. Emission Factors- Emissions from these furnaces are produced during the melting process, and are dependent upon the amount of glass being produced. Emissions of CO and VOC will be calculated using emission factors derived from the annual emission limit and annual production limit listed in the Construction Permit. At the request of RMB, the emission factor will be expressed in a manner that is consistent with their emission tracking system. Emissions of particulate and PM_{10} will be calculated using emission factors equivalent to the limits listed in NSPS Subpart CC. The emission factors to be used are as follows:

Pollutant	Emission Factor	Source
CO	60.8/365,000 tons CO/ ton of glass produced	Calculation
VOC	38.4/365,000 tons VOC/ ton of glass produced	Calculation
PM_{10}	0.1 tons/1,000 tons of glass produced	Calculation
Particulate	0.1 tons/1,000 tons of glass produced	Calculation

3. Monitoring Plan- Conditions 1.1 through 1.6 of Section II of the Operating Permit list the monitoring and recordkeeping provisions necessary to monitor compliance with applicable requirements for these furnaces.

The Division has determined that units that are subject to a NSPS, and that do not utilize CEM's to monitor emissions, shall conduct two stack tests during the term of the Operating Permit, one within 365 days of permit issuance and one within 365 days prior to permit expiration. RMBC has recently conducted a stack test to determine compliance with the NSPS particulate standard and that test will be considered to be the initial stack test required by the Operating Permit.

In addition to the stack test requirements described above, the source will be required to perform emission calculations utilizing the appropriate emission factors and glass production rates. For the purpose of demonstrating compliance with annual CO, VOC, particulate and PM10 emission limits, the applicant will be required to conduct the emission calculation during each 28 day period using the appropriate emission factors and glass production rates. Rolling thirteen period emission and glass production totals will be maintained for comparison with the annual emission and production limits. For the purpose of calculating fees, the applicant will be required to conduct the emission calculation annually and submit a revised APEN to the Division if emissions increase as described in Regulation No. 3, Part A, Section II.C.2.

Compliance with the opacity standard of 20% will be determined through visual observations of the exhaust stack. Observation of visible emissions will require that a Method 9 opacity measurement be made.

4. Compliance Status- The applicant certified in the operating permit application that these furnaces were in compliance with all applicable requirements at the time of Operating Permit resubmittal. As stated previously, these furnaces have recently been tested successfully for compliance with the particulate emission limits. In addition, the most recent field inspection report indicates that the 1998 amount of glass production was well below the current permit limit and no opacity issues were noted. Thus, this source is considered to be in compliance with all applicable requirements.

<u>Unit P008</u>-Batch Plant

The raw materials (sand, limestone, and soda) used in the manufacture of glass products are unloaded at the batch plant and transferred to storage silos. These materials are then conveyed to a batch mixer where they are weighed and combined in exact proportions. Recycled glass (cullet) is also added to the mixer. The resulting mixture is the feed material for the glass melting furnaces.

Discussion:

1. Applicable Requirements- Prior to the Title V application resubmittal, Colorado Construction Permit 92JE129-4 defined applicable requirements

for this plant. Construction Permit modification requests were not made by the applicant as part of the Operating Permit application process. The terms contained in the existing Construction Permit are as follows:

Parameter	Short Term Limit	Long Term Limit
Particulate	1.9 lbs/hr	7.84 tons/yr
PM_{10}	1.9 lbs/hr	7.84 tons/yr
Batch production	80 tons/hr	650,000 tons/yr

As stated previously, none of the short term limits will be incorporated into the Operating Permit. The Regulation No. 1 process weight rate particulate limit will be included as an applicable requirement because it defines a short term limit. The annual particulate and PM_{10} emission limitations, the batch production limitation and the 20% opacity limitation will be incorporated into the Operating Permit. In addition, the current Construction Permit contains a requirement that emissions be controlled by a baghouse capable of a 99% emission reduction. That requirement will also be incorporated into the Operating Permit.

2. Emission Factors- Emissions from the batch plant result from the storage, transfer and mixing of the glass furnace raw materials and are dependent upon the amount of batch production that occurs during the course of the year. Emissions of particulate and PM_{10} from this plant will be calculated using an emission factor derived from the emission limits and annual batch production limitation contained in the current Construction Permit. At the request of RMB, the emission factor will be expressed in a manner that is consistent with their emission tracking system. These emission factors are as follows:

Pollutant	Emission Factor	Source
Particulate	7.84/650,000 tons PM/ ton of batch production	Calculation
PM_{10}	7.84/650,000 tons PM_{10}/ ton of batch production	Calculation

3. Monitoring Plan- Conditions 2.1 through 2.5 of Section II of the Operating Permit list the monitoring and recordkeeping provisions necessary to monitor compliance with applicable requirements for this source. Emission calculation and measurement of batch production are considered to be the minimum requirements for this plant.

Because Construction Permit 92JE129-4 contains an annual emission limit for particulate and PM_{10}, the applicant will be required to calculate emissions at the end of each 28 day period using the actual amount of batch produced and the emission factors listed above. Rolling thirteen period emission and batch production totals will be maintained for comparison with the annual limits.

Emission calculations for fee purposes will be based on the quantity of batch material produced and the appropriate emission factor. The applicant will be required to conduct the emission calculation annually and submit a revised APEN to the Division if emissions increase as described in Regulation No. 3, Part A, Section II.C.2.

4. Compliance Status- The applicant certified in the operating permit resubmittal that this source was in compliance with all applicable requirements at the time of submittal. In addition, the most recent field inspection report indicates that the 1998 amount of batch produced was well below the current permit limit and no opacity issues were noted. Thus, this source is considered to be in compliance with all applicable requirements.

Unit P010-New Cullet Processing Plant

Discussion:

1. Applicable Requirements- Prior to the Title V application resubmittal, Colorado Construction Permit 92JE129-6 defined applicable requirements for this plant. Construction Permit modification requests were not made by the applicant as part of the Operating Permit application process. The terms contained in the existing Construction Permit are as follows:

Parameter	Short Term Limit	Long Term Limit
Particulate	1.1 lbs/hr	4.8 tons/yr
PM_{10}	0.37 lbs/hr	1.6 tons/yr
Cullet processing	35 tons/hr	306,600 tons/yr

As stated previously, none of the short term limits will be incorporated into the Operating Permit. The Regulation No. 1 process weight rate

particulate limit will be included as an applicable requirement because it defines a short term limit. The annual particulate and PM_{10} emission limitations, the cullet processing limitation and the 20% opacity limitation will be incorporated into the Operating Permit. In addition, the current Construction Permit contains a requirement that emissions be controlled by a baghouse capable of a 99% emission reduction. That requirement will also be incorporated into the Operating Permit.

2. Emission Factors- Emissions from the cullet processing plant are dependent upon the amount of cullet processed during the course of the year. Emissions of particulate and PM_{10} from this plant will be calculated using an emission factor derived from the emission limits and annual cullet processing limitation contained in the current Construction Permit. These emission factors are as follows:

Pollutant	Emission Factor	Source
Particulate	4.8/306,600 tons PM/ ton of cullet processed	Calculation
PM_{10}	1.6/306,600 tons PM/ on of cullet processed	Calculation

3. Monitoring Plan- Conditions 3.1 through 3.5 of Section II of the Operating Permit list the monitoring and recordkeeping provisions necessary to monitor compliance with applicable requirements for this source. Emission calculation and measurement of cullet processed are considered to be the minimum requirements for this plant.

Because Construction Permit 92JE129-6 contains an annual emission limit for particulate and PM_{10}, the applicant will be required to calculate emissions at the end of each 28 day period using the actual amount of cullet processed and the emission factors listed above. Rolling thirteen period emission and cullet processing totals will be maintained for comparison with the annual limits.

Emission calculation for fee purposes will be based on actual annual cullet processing and the appropriate emission factor. The applicant will be required to conduct the emission calculation annually and submit a revised APEN to the Division if emissions increase as described in Regulation No. 3, Part A, Section II.C.2.

4. Compliance Status- The applicant certified in the operating permit

resubmittal that this plant was not in compliance with all applicable requirements at the time of submittal, due to the lack of an APEN for part of this source. The APEN was submitted with the operating permit resubmittal. In addition, the most recent field inspection report indicates that the 1998 processing of cullet was below the current permit limit and no opacity issues were noted. Thus, this source is considered to be in compliance with all applicable requirements.

Unit P011-Wash Tanks

Discussion:

1. Applicable Requirements- Prior to the Title V application resubmittal, Colorado Construction Permit 92JE129-7 defined applicable requirements for these parts cleaning tanks. Construction Permit modification requests were not made by the applicant as part of the Operating Permit application process. The terms contained in the existing Construction Permit are as follows:

Parameter	Short Term Limit	Long Term Limit
VOC	None	2.97 tons/yr
Solvent Consumption	None	900 gal/yr

The annual VOC and solvent use limitations will be incorporated into the Operating Permit.

This source is subject to Regulation No. 7, Part X, Subpart B. That regulation identifies operational and design requirements for the control of VOC emissions from Solvent Cold-Cleaners. Those requirements have been incorporated into the Operating Permit.

2. Emission Factors- Emissions from the wash tanks are dependent upon the amount of solvent used during the course of the year and the VOC content of that solvent. Emissions of VOC from these tanks will be calculated using the annual amount of each solvent consumed and the corresponding VOC content of each solvent.

3. Monitoring Plan- Conditions 4.1 through 4.2 of Section II of the Operating Permit list the monitoring and recordkeeping provisions necessary to monitor compliance with applicable requirements for these

tanks. Emission calculation and measurement of solvent consumption are considered to be the minimum requirements for these tanks.

Because Construction Permit 92JE129-9 contains an annual emission limit for VOC, the applicant will be required to calculate emissions at the end of each 28 day period using actual solvent consumption and the corresponding VOC content of each solvent. Rolling thirteen period emission and solvent consumption totals will be maintained for comparison with the annual limits.

Emission calculation for fee purposes will be based on actual annual coating consumption and the appropriate emission factor. The applicant will be required to conduct the emission calculation annually and submit a revised APEN to the Division if emissions increase as described in Regulation No. 3, Part A, Section II.C.2.

4. Compliance Status- The most recent inspection of this source by the Division indicates that solvent consumption by these tanks is well below the limit specified in the Construction Permit. Lacking any credible evidence to the contrary, this source is considered to be in compliance with all applicable requirements.

Unit P013-Ink Jet Printers for Box Marking

Discussion:

1. Applicable Requirements- Prior to the Title V application resubmittal, Colorado Construction Permit 92JE129-9 defined applicable requirements for these printers. Construction Permit modification requests were not made by the applicant as part of the Operating Permit application process. The terms contained in the existing Construction Permit are as follows:

Parameter	Short Term Limit	Long Term Limit
VOC	None	1.8 tons/yr
Ink Consumption	280 lbs/period	2,000 liters/yr

The annual VOC and ink use limitations will be incorporated into the Operating Permit.

2. Emission Factors- Emissions from the ink jet printers are dependent

upon the amount of ink applied to the container boxes during the course of the year. Emissions of VOC from these printers will be calculated using the VOC content of the ink and cleaner and the ink and cleaner consumption per 28 day period. The equation to be used is as follows:

Tons VOC/period = (VOC Content of the Ink and Cleaner) H (Ink and Cleaner Consumption/Period) / 2000

3. Monitoring Plan- Conditions 5.1 through 5.2 of Section II of the Operating Permit list the monitoring and recordkeeping provisions necessary to monitor compliance with applicable requirements for these printers. Emission calculation and measurement of ink and cleaner consumption are considered to be the minimum requirements for these printers.

Because Construction Permit 92JE129-9 contains an annual emission limit for VOC, the applicant will be required to calculate emissions at the end of each 28 day period using actual ink and cleaner consumption and the equation listed above. Rolling thirteen period emission and ink and cleaner consumption totals will be maintained for comparison with the annual limits.

Emission calculation for fee purposes will be based on actual annual ink and cleaner consumption and the appropriate VOC content. The applicant will be required to conduct the emission calculation annually and submit a revised APEN to the Division if emissions increase as described in Regulation No. 3, Part A, Section II.C.2.

4. Compliance Status- The applicant certified in the operating permit resubmittal that these machines were in compliance with all applicable requirements at the time of submittal. In addition, the most recent field inspection report indicates that the 1998 consumption of ink and cleaner was well below the current permit limit. Thus, this source is considered to be in compliance with all applicable requirements.

<u>Unit P014</u>-Hot End Coating Spray Application Systems (7)

Discussion:

1. Applicable Requirements- Prior to the Title V application resubmittal, Colorado Construction Permit 92JE129-10 defined applicable

requirements for these systems. Construction Permit modification requests were not made by the applicant as part of the Operating Permit application process. The terms contained in the existing Construction Permit are as follows:

Parameter	Short Term Limit	Long Term Limit
VOC	3.86 lbs/hr	16.9 tons/yr
Coating Use	None	48,000 lbs/yr

The annual VOC and coating use limitations will be incorporated into the Operating Permit.

This source is subject to the control techniques and work practice requirements as described in Colorado Construction Permit 92JE129-10.

2. Emission Factors- Emissions from the coating spray application systems are dependent upon the amount of coating applied to the bottles during the course of the year. Emissions of VOC from these systems will be calculated using an emission factor derived from the VOC emission limit and annual coating use limitation contained in the current Construction Permit. At the request of RMB, the emission factor will be expressed in a manner that is consistent with their emission tracking system. This emission factor is as follows:

Pollutant	Emission Factor	Source
VOC	16.9/48,000 tons VOC/ poundof monobutyltintrichloride consumed	Calculation

3. Monitoring Plan- Conditions 6.1 through 6.3 of Section II of the Operating Permit list the monitoring and recordkeeping provisions necessary to monitor compliance with applicable requirements for these systems. Emission calculation and measurement of coating consumption are considered to be the minimum requirements for these systems.

Because Construction Permit 92JE129-10 contains an annual emission limit for VOC, the applicant will be required to calculate emissions at the end of each 28 day period using actual coating consumption and the emission factor listed above. Rolling thirteen period emission and coating consumption totals will be maintained for comparison with the annual

limits.

Emission calculation for fee purposes will be based on actual annual coating consumption and the appropriate emission factor. The applicant will be required to conduct the emission calculation annually and submit a revised APEN to the Division if emissions increase as described in Regulation No. 3, Part A, Section II.C.2.

4. Compliance Status- The applicant certified in the operating permit resubmittal that these machines were in compliance with all applicable requirements at the time of submittal. In addition, the most recent field inspection report indicates that the 1998 consumption of coating was below the current permit limit. Thus, this source is considered to be in compliance with all applicable requirements.

Unit P016-Individual Section Bottle Making Machines (8)

Discussion:

1. Applicable Requirements- Prior to Title V application submittal, Colorado Construction Permit 92JE129-12 defined applicable requirements for these eight machines. Revisions to the existing permit limits were not requested by the applicant. The terms contained in the existing Construction Permit are as follows:

Parameter	Short Term Limit	Long Term Limit
NOx	0.01 lbs/hr	0.03 tons/yr
CO	0.16 lbs/hr	0.7 tons/yr
VOC	0.3 lbs/hr	1.3 tons/yr
SO_2	1.6 lbs/hr	6.8 tons/yr
Particulate	4.2 lbs/hr	18.2 tons/yr
PM_{10}	0.3 lbs/hr	1.3 tons/yr
Oil Consumption	6 tons/28 day period	65 tons/yr

As stated previously, none of the short term limits will be incorporated into the Operating Permit. In addition, the NOx and CO long term limits will not be incorporated because they are below the APEN de minimis level. The Regulation No. 1 process weight rate particulate limit will be included as an applicable requirement because it defines a short term limit. The annual VOC, SO_2, particulate, PM_{10} and oil consumption limitations and

the 20% opacity limit will be incorporated into the Operating Permit.

2. Emission Factors- Emissions from these machines are produced during the bottle forming process as a result of the application of lubricating oil to the bottle forming molds. The primary pollutants are sulfur dioxide (SO_2) and particulate matter, although some volatile organic compounds (VOCs) are emitted. Emissions of all pollutants except VOC will be calculated using emission factors derived from the annual emission limits and annual oil consumption limit listed in the Construction Permit. VOC emissions will be calculated for each lubricant used based on the quantity used and the lubricant VOC content. The derived emission factors are as follows:

Pollutant	Emission Factor	Source
VOC	lubricant VOC content	Calculation
SO_2	0.105 ton/ton of oil consumed	Calculation
Particulate	0.28 ton/ton of oil consumed	Calculation
PM_{10}	0.02 ton/ton of oil consumed	Calculation

3. Monitoring Plan- Conditions 7.1 through 7.4 of Section II of the Operating Permit list the monitoring and recordkeeping provisions necessary to monitor compliance with applicable requirements for these machines. Emission calculation and measurement of oil consumption are considered to be the minimum requirements for these machines.

Because Construction Permit 88RB376-8 contains annual emission limits for VOC, SO_2, particulate and PM_{10}, the applicant will be required to calculate emissions at the end of each 28 day period using actual oil consumption and the emission factors listed above. Rolling thirteen period emission and oil consumption totals will be maintained for comparison with the annual limits.

Emission calculation for fee purposes will be based on actual annual oil consumption and the appropriate emission factors. The applicant will be required to conduct the emission calculation annually and submit a revised APEN to the Division if emissions increase as described in Regulation No. 3, Part A, Section II.C.2.

4. Compliance Status- The applicant certified in the operating permit resubmittal that these machines were in compliance with all applicable requirements at the time of submittal. In addition, the most recent field

inspection report indicates that the 1998 consumption of lubricating oil was well below the current permit limits. Thus, this source is considered to be in compliance with all applicable requirements.

IV. Insignificant Activities

Several insignificant activities were listed by the applicant as an addendum to form 102B. These activities include annealing ovens, backup generators, cold end coating, a hot water boiler, a propane tank farm and wastewater storage tanks, all of which were deemed insignificant based on size or emission level.

V. Alternative Operating Scenarios

There are no alternative operating scenarios associated with this facility.

VI. Permit Shield

RMB submitted an extensive list of requested Permit Shield citations with the Operating Permit application resubmittal. After review by the Division, it was determined that some of the requests could not be granted for various reasons which were described in a letter from the Division to RMB dated July 3, 2001. The requested citations that were granted the Permit Shield are listed in Section III of the Operating Permit.

VII. Accidental Release Program - 112(r)

A provision under Part 70 of the Clean Air Act (amended) is the Accidental Release provisions of section 112(r). Under this program, EPA established a list of substances that pose the greatest risk of death or serious injury to humans or extreme harm to the environment. Additionally, a list of flammable substances and high explosives were set forth. Each substance was given a threshold or de minimis level by considering their individual toxicity, reactivity, volatility, flammability, explosiveness, and dispersiveness. Facilities using any of these substances in greater-than-threshold quantities are required to prepare and implement a Risk Management/Prevention Plan for those substances.

RMBC, in the submittal of comments on the draft Operating Permit, indicated that

this facility is not subject to section 112(r).