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This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a **State and Federally Enforceable Section**

1. None

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b **State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility:

Z001 - lid gasket adhesive;
Z006 - metal drawing oil;
Z007 - vanishing oil; and
Z010 - chime paint - top drum chime.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a permit to install for the emissions unit.
The following insignificant emissions units are located at this facility:

Z001 - lid gasket adhesive;
Z006 - metal drawing oil;
Z007 - vanishing oil; and
Z010 - chime paint - top drum chime.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a permit to install for the emissions unit.

Go to Part III for Emissions Unit K001
Go to Part III for Emissions Unit K002
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0661000004 Emissions Unit ID: K001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Three spray booths and two ovens used for the interior/exterior coating of steel drums less than 22.5" in diameter - drum coating line #1.	OAC rule 3745-31-05(A)(3) (PTI 06-5620)	Volatile organic compound (VOC) emissions shall not exceed 87.5 lbs/hr and 152 tpy, including cleanup material emissions. Particulate emissions shall not exceed 2.41 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U). See section A.II.1 below.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-21-09(U)	The VOC contents of the coatings employed shall not exceed the following: 4.3 lbs/gallon, excluding water and exempt solvents, for interior coating of drums; and 3.5 lbs/gallon, excluding water and exempt solvents, for exterior coating of drums.
	OAC rule 3745-31-05(D)	Combined emissions from emissions units K001, K002, and K003 shall not exceed 152 tons of VOC per year as a rolling, 12-month summation. Combined emissions from emissions units K001, K002, and K003 shall not exceed 53 tons of total hazardous air pollutants (HAPs) per year as a rolling, 12-month summation. See sections A.II.2 through A.II.4 below.

2. **Additional Terms and Conditions**

a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit based upon the information provided by the permittee in the Title V permit application. Therefore, no additional monitoring, record keeping or reporting requirements are necessary to demonstrate compliance with this emission limitation.

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II. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

2. The total quantity of VOC applied in emissions units K001, K002, and K003 shall not exceed 152 tons per rolling, 12-month period.

3. The total quantity of HAPs applied in emissions units K001, K002, and K003 shall not exceed 53 tons per rolling, 12-month period.

4. The permittee shall comply with the rolling, 12-month VOC and HAPs emission limitations and the monitoring and record keeping requirements immediately upon issuance of this permit, by the use of data from the previous 12 months of operation.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:

   a. the name and identification number of each coating, thinner, and cleanup material;

   b. the VOC content of each coating, thinner, and cleanup material, in pounds per gallon;

   c. the VOC content of each interior coating, in pounds per gallon, excluding water and exempt solvents;

   d. the VOC content of each exterior coating, in pounds per gallon, excluding water and exempt solvents;

   e. the number of gallons of each coating, thinner, and cleanup material employed; and

   f. the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, in tons per month.

2. The permittee shall collect and record the following information each month for emissions units K001, K002, and K003 combined:

   a. the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, i.e., the summation of the values in section A.III.1.f for the emissions units, in tons;

   b. the individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon;

   c. the total HAPs content of each coating, thinner, and cleanup material, in pounds per gallon;

   d. the number of gallons of each coating, thinner, and cleanup material employed;

   e. the total HAPs emissions (HAPs applied) from all coatings, thinners, and cleanup materials employed, i.e., the summation of (c) times (d) divided by 2000, for each coating, each thinner, and each cleanup material, in tons;

   f. the rolling, 12-month summation of the total HAPs emissions (HAPs applied) from all coatings, thinners, and cleanup materials employed, in tons; and

   g. the rolling, 12-month summation of the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, in tons.

3. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying interior and/or exterior coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports that identify the following:

   a. all days when this emissions unit was in operation and the dry filtration system was not in service; and

   b. all exceedances of the rolling, 12-month VOC and HAPs emission limitations for emissions units K001, K002, and K003, combined.

   The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit, the total VOC emissions from emissions units K001, K002, and K003 combined, and the total HAPs emissions from emissions units K001, K002, and K003 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:
4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of drums

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of drums

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings, thinners, and cleanup materials.

b. Emission Limitations:
VOC emissions shall not exceed 87.5 lbs/hr and 152 tpy, including cleanup material emissions.

Applicable Compliance Method:
The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit based upon the information provided by the permittee in the Title V permit application. If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

Compliance with the annual VOC emission limitation shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

c. Emission Limitation:
Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emission rate, the following equation shall be used:

E = (M) * (1-TE) * (1-CE)

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),
CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
Particulate emissions shall not exceed 2.41 tpy.

Applicable Compliance Method:
This emission limitation was established by multiplying the short term particulate emission limitation (0.551 lb/hr) by 8760 hrs/yr, and dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee demonstrates compliance with the short term particulate emission limitation.

e. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limitation but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

f. Emission Limitation:
Combined emissions from emissions units K001, K002, and K003 shall not exceed 152 tons of VOC per year as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

g. Emission Limitation:

Combined emissions from emissions units K001, K002, and K003 shall not exceed 53 tons of total HAPs per year as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0661000004 Emissions Unit ID: K001 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Three spray booths and two ovens used for the interior/exterior coating of steel drums less than 22.5" in diameter - drum coating line #1.		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK

TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 16.62
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347.8
MAGLC (ug/m3): 4880

Pollutant: xylene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 14.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 298.8
MAGLC (ug/m3): 10,333

Pollutant: ethylene glycol

TLV (ug/m3): 129,680
Maximum Hourly Emission Rate (lbs/hr): 2.21
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.15
MAGLC (ug/m3): 3,088

Pollutant: ethylbenzene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 3.09
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.7
MAGLC (ug/m3): 10,333

Pollutant: glycol ether

TLV (ug/m3): 123,410
Maximum Hourly Emission Rate (lbs/hr): 37.79
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,671.4
MAGLC (ug/m3): 2,938
Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0661000004 Emissions Unit ID: K002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
One spray booth and one oven used for the interior/exterior coating of steel drums greater than 20" in diameter - drum coating line #2.	OAC rule 3745-31-05(A)(3) (PTI 06-5620)	Volatile organic compound (VOC) emissions shall not exceed 58.22 lbs/hr and 152 tpy, including cleanup material emissions. Particulate emissions shall not exceed 2.41 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U). See section A.II.1 below.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-21-09(U)	The VOC contents of the coatings employed shall not exceed the following: 4.3 lbs/gallon, excluding water and exempt solvents, for interior coating of drums; and 3.5 lbs/gallon, excluding water and exempt solvents, for exterior coating of drums.
	OAC rule 3745-31-05(D)	Combined emissions from emissions units K001, K002, and K003 shall not exceed 152 tons of VOC per year as a rolling, 12-month summation. Combined emissions from emissions units K001, K002, and K003 shall not exceed 53 tons of total hazardous air pollutants (HAPs) per year as a rolling, 12-month summation. See sections A.II.2 through A.II.4 below.

2. **Additional Terms and Conditions**

a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit based upon the information provided by the permittee in the Title V permit application. Therefore, no additional monitoring, record keeping or reporting requirements are necessary to demonstrate compliance with this emission limitation.

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II. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

2. The total quantity of VOC applied in emissions units K001, K002, and K003 shall not exceed 152 tons per rolling, 12-month period.

3. The total quantity of HAPs applied in emissions units K001, K002, and K003 shall not exceed 53 tons per rolling, 12-month period.

4. The permittee shall comply with the rolling, 12-month VOC and HAPs emission limitations and the monitoring

and record keeping requirements immediately upon issuance of this permit, by the use of data from the previous 12 months of operation.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:

   a. the name and identification number of each coating, thinner, and cleanup material;

   b. the VOC content of each coating, thinner, and cleanup material, in pounds per gallon;

   c. the VOC content of each interior coating, in pounds per gallon, excluding water and exempt solvents;

   d. the VOC content of each exterior coating, in pounds per gallon, excluding water and exempt solvents;

   e. the number of gallons of each coating, thinner, and cleanup material employed; and

   f. the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, in tons per month.

2. The permittee shall collect and record the following information each month for emissions units K001, K002, and K003 combined:

   a. the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, i.e., the summation of the values in section A.III.1.f for the emissions units, in tons;

   b. the individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon;

   c. the total HAPs content of each coating, thinner, and cleanup material, in pounds per gallon;

   d. the number of gallons of each coating, thinner, and cleanup material employed;

   e. the total HAPs emissions (HAPs applied) from all coatings, thinners, and cleanup materials employed, i.e., the summation of (c) times (d) divided by 2000, for each coating, each thinner, and each cleanup material, in tons;

   f. the rolling, 12-month summation of the total HAPs emissions (HAPs applied) from all coatings, thinners, and cleanup materials employed, in tons; and

   g. the rolling, 12-month summation of the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, in tons.

3. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying interior and/or exterior coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports that identify the following:

   a. all days when this emissions unit was in operation and the dry filtration system was not in service; and

   b. all exceedances of the rolling, 12-month VOC and HAPs emission limitations for emissions units K001, K002, and K003, combined.

   The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit, the total VOC emissions from emissions units K001, K002, and K003 combined, and the total HAPs emissions from emissions units K001, K002, and K003 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitations:
      4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of

drums

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of drums

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings, thinners, and cleanup materials.

b. Emission Limitations:
VOC emissions shall not exceed 58.22 lbs/hr and 152 tpy, including cleanup material emissions.

Applicable Compliance Method:
The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit based upon the information provided by the permittee in the Title V permit application. If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

Compliance with the annual VOC emission limitation shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

c. Emission Limitation:
Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emission rate, the following equation shall be used:

E = (M) * (1-TE) * (1-CE)

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),
CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
Particulate emissions shall not exceed 2.41 tpy.

Applicable Compliance Method:
This emission limitation was established by multiplying the short term particulate emission limitation (0.551 lb/hr) by 8760 hrs/yr, and dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee demonstrates compliance with the short term particulate emission limitation.

e. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limitation but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

f. Emission Limitation:
Combined emissions from emissions units K001, K002, and K003 shall not exceed 152 tons of VOC per year as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

g. Emission Limitation:
Combined emissions from emissions units K001, K002, and K003 shall not exceed 53 tons of total HAPs per year as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0661000004 Emissions Unit ID: K002 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
One spray booth and one oven used for the interior/exterior coating of steel drums greater than 20" in diameter - drum coating line #2.		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (K002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK

TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 16.62
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347.8
MAGLC (ug/m3): 4880

Pollutant: xylene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 14.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 298.8
MAGLC (ug/m3): 10,333

Pollutant: ethylene glycol

TLV (ug/m3): 129,680

Maximum Hourly Emission Rate (lbs/hr): 2.21
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.15
MAGLC (ug/m3): 3,088

Pollutant: ethylbenzene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 3.09
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.7
MAGLC (ug/m3): 10,333

Pollutant: glycol ether

TLV (ug/m3): 123,410
Maximum Hourly Emission Rate (lbs/hr): 37.79
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,671.4
MAGLC (ug/m3): 2,938
Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0661000004 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Two spray booths and one oven used for the interior/exterior coating of steel drum covers and bottoms - drum coating line #3.	OAC rule 3745-31-05(A)(3) (PTI 06-5620)	Volatile organic compound (VOC) emissions shall not exceed 10.45 lbs/hr and 45.77 tpy, including cleanup material emissions. Particulate emissions shall not exceed 2.41 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), and 3745-21-09(U). See section A.II.1 below.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-21-09(U)	The VOC contents of the coatings employed shall not exceed the following: 4.3 lbs/gallon, excluding water and exempt solvents, for interior coating of drums; and 3.5 lbs/gallon, excluding water and exempt solvents, for exterior coating of drums.
	OAC rule 3745-31-05(D)	Combined emissions from emissions units K001, K002, and K003 shall not exceed 152 tons of VOC per year as a rolling, 12-month summation. Combined emissions from emissions units K001, K002, and K003 shall not exceed 53 tons of total hazardous air pollutants (HAPs) per year as a rolling, 12-month summation. See sections A.II.2 through A.II.4 below.

2. **Additional Terms and Conditions**

a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit based upon the information provided by the permittee in the Title V permit application. Therefore, no additional monitoring, record keeping or reporting requirements are necessary to demonstrate compliance with this emission limitation.

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II. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

2. The total quantity of VOC applied in emissions units K001, K002, and K003 shall not exceed 152 tons per rolling, 12-month period.

3. The total quantity of HAPs applied in emissions units K001, K002, and K003 shall not exceed 53 tons per rolling, 12-month period.

4. The permittee shall comply with the rolling, 12-month VOC and HAPs emission limitations and the monitoring and record keeping requirements immediately upon issuance of this permit, by the use of data from the previous 12 months of operation.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:

   a. the name and identification number of each coating, thinner, and cleanup material;

   b. the VOC content of each coating, thinner, and cleanup material, in pounds per gallon;

   c. the VOC content of each interior coating, in pounds per gallon, excluding water and exempt solvents;

   d. the VOC content of each exterior coating, in pounds per gallon, excluding water and exempt solvents;

   e. the number of gallons of each coating, thinner, and cleanup material employed; and

   f. the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, in tons per month.

2. The permittee shall collect and record the following information each month for emissions units K001, K002, and K003 combined:

   a. the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, i.e., the summation of the values in section A.III.1.f for the emissions units, in tons;

   b. the individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon;

   c. the total HAPs content of each coating, thinner, and cleanup material, in pounds per gallon;

   d. the number of gallons of each coating, thinner, and cleanup material employed;

   e. the total HAPs emissions (HAPs applied) from all coatings, thinners, and cleanup materials employed, i.e., the summation of (c) times (d) divided by 2000, for each coating, each thinner, and each cleanup material, in tons;

   f. the rolling, 12-month summation of the total HAPs emissions (HAPs applied) from all coatings, thinners, and cleanup materials employed, in tons; and

   g. the rolling, 12-month summation of the total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed, in tons.

3. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying interior and/or exterior coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports that identify the following:

   a. all days when this emissions unit was in operation and the dry filtration system was not in service; and

   b. all exceedances of the rolling, 12-month VOC and HAPs emission limitations for emissions units K001, K002, and K003, combined.

   The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit, the total VOC emissions from emissions units K001, K002, and K003 combined, and the total HAPs emissions from emissions units K001, K002, and K003 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitations:
      4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of drums

      3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of drums

      Applicable Compliance Method:
      Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings, thinners, and cleanup materials.

b. Emission Limitations:
VOC emissions shall not exceed 10.45 lbs/hr and 45.77 tpy, including cleanup material emissions.

Applicable Compliance Method:
The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit based upon the information provided by the permittee in the Title V permit application. If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

Compliance with the annual VOC emission limitation shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

c. Emission Limitation:
Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emission rate, the following equation shall be used:

E = (M) * (1-TE) * (1-CE)

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),
CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
Particulate emissions shall not exceed 2.41 tpy.

Applicable Compliance Method:
This emission limitation was established by multiplying the short term particulate emission limitation (0.551 lb/hr) by 8760 hrs/yr, and dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee demonstrates compliance with the short term particulate emission limitation.

e. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limitation but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

f. Emission Limitation:
Combined emissions from emissions units K001, K002, and K003 shall not exceed 152 tons of VOC per year as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

g. Emission Limitation:
Combined emissions from emissions units K001, K002, and K003 shall not exceed 53 tons of total HAPs per year as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0661000004 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Two spray booths and one oven used for the interior/exterior coating of steel drum covers and bottoms - drum coating line #3.		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK

TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 16.62
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347.8
MAGLC (ug/m3): 4880

Pollutant: xylene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 14.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 298.8
MAGLC (ug/m3): 10,333

Pollutant: ethylene glycol

TLV (ug/m3): 129,680
Maximum Hourly Emission Rate (lbs/hr): 2.21
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.15
MAGLC (ug/m3): 3,088

Pollutant: ethylbenzene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 3.09
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.7
MAGLC (ug/m3): 10,333

Pollutant: glycol ether

TLV (ug/m3): 123,410
Maximum Hourly Emission Rate (lbs/hr): 37.79
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,671.4
MAGLC (ug/m3): 2,938
Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None