



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
WOOD COUNTY  
Application No: 03-13225**

**CERTIFIED MAIL**

|   |                              |
|---|------------------------------|
| X | TOXIC REVIEW                 |
|   | PSD                          |
| X | SYNTHETIC MINOR              |
|   | CEMS                         |
|   | MACT                         |
|   | NSPS                         |
|   | NESHAPS                      |
|   | NETTING                      |
|   | MAJOR NON-ATTAINMENT         |
|   | MODELING SUBMITTED           |
|   | GASOLINE DISPENSING FACILITY |

**DATE: February 16, 2000**

Crown Cork & Seal  
Michael Antry  
One Crown Way  
Philadelphia, PA 19154-4599

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA  
DAPC, NWDO



**FINAL PERMIT TO INSTALL 03-13225**

Application Number: 03-13225

APS Premise Number: 0387040189

Permit Fee: **\$200**

Name of Facility: Crown Cork & Seal

Person to Contact: Michael Antry

Address: One Crown Way

Philadelphia, PA 19154-4599

Location of proposed air contaminant source(s) [emissions unit(s)]:

**29200 Glenwood Road  
Perrysburg, Ohio**

Description of proposed emissions unit(s):

**3-PIECE CAN END SEALING COMPOUND COATING OPERATION.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

\_\_\_\_\_  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11

below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## 8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## 9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**5. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be

extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**6. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**7. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**8. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**9. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**10. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC              | 30.29                |

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>                                   | <u>Applicable Rules/Requirements</u>                              | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| 3-piece can end sealing compound coating operation (food can end press line #2) | OAC rule 3745-21-09(D)(2)(e)                                      | 3.7 lbs VOC/gal, excluding water and exempt solvents, from the application of end sealing compound coatings                    |
|   | OAC rule 3745-31-05(D) synthetic minor to avoid PSD applicability | 1.43 TPY VOC from cleanup operations (see A.II.2 & A.II.3)   |
|   | OAC rule 3745-31-05(A)  | 28.86 TPY VOC from the application of coating operations based on coating usage and VOC/gal restrictions (see A.II.1 & A.II.3) |
|   | OAC rule 3745-31-05(A)  | 10.36 lbs VOC/hr, from the application of end sealing compound coatings  |
|   |   | 570 lbs VOC/month from cleanup material (see A.2.a)  |

**2. Additional Terms and Conditions**

**2.a** None.

**II. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 3.7 lbs VOC/gal.
2. The permittee shall not employ any cleanup material in excess of 5.7 lbs VOC/gal.
3. The maximum annual coating usage for this emissions unit shall not exceed 15,600 gals/yr, based upon a rolling, 12-month summation of the coating usage.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the coating usage levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable<br/>Cumulative Coating Usage in Gallons</u> |
|-----------------|--|
| 1               | 1,300  |
| 1-2             | 2,600  |
| 1-3             | 3,900  |
| 1-4             | 5,200  |
| 1-5             | 6,500  |
| 1-6             | 7,800  |
| 1-7             | 9,100  |
| 1-8             | 10,400   |
| 1-9             | 11,700   |
| 1-10            | 13,000   |
| 1-11            | 14,300   |
| 1-12            | 15,600   |

After the first 12 calendar months of operation, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage.

The maximum annual cleanup material usage for this emissions unit shall not exceed 500 gallons per year, based upon a rolling, 12-month summation of the cleanup material usage.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the clean up material usage levels specified in the following table:

| <u>Months</u> | <u>Maximum Allowable Cumulative<br/>Cleanup Material Usage in Gallons</u> |
|---------------|---|
| 1             | 100   |
| 1-2           | 200   |
| 1-3           | 300   |
| 1-4           | 400   |
| 1-5           | 500   |
| 1-6           | 500   |
| 1-7           | 500   |
| 1-8           | 500   |
| 1-9           | 500   |
| 1-10          | 500   |
| 1-11          | 500   |
| 1-12          | 500   |

After the first 12 calendar months of operation, compliance with the annual clean up material usage limitation shall be based upon a rolling, 12-month summation of the clean up material usage figures.

4. This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-Heptane

TLV (ug/m3): 1,640,000

Maximum Hourly Emission Rate (lbs/hr): 0.94

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 20.85

MAGLC (ug/m3): 39,048

Pollutant: Hexane Isomers

TLV (ug/m3): 1,760,000

Maximum Hourly Emission Rate (lbs/hr): 0.94

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 20.85

MAGLC (ug/m3): 41,904

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 0.71

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 15.64

MAGLC (ug/m3): 23,405

Pollutant: Ethyl Alcohol

TLV (ug/m3): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 0.71

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 15.64

MAGLC (ug/m3): 44,762

Pollutant: n-Hexane

TLV (ug/m3): 176,000

Maximum Hourly Emission Rate (lbs/hr): 0.47

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10.42

MAGLC (ug/m3): 4,190

5. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the coatings or cleanup materials used, 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 specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
  - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
  - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
6. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
7. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
  - a. The name and identification number of each coating, as applied, and the name and identification of each clean up material.
  - b. The VOC content of each coating, as applied, and each cleanup material, in pounds per gallon.
  - c. The VOC content of each coating, excluding water and exempt solvents, as applied.
  - d. The number of gallons of each coating employed.
  - e. The total gallons of all coatings employed (summation of d).

- f. During the first 12 calendar months of operation under this permit, the permittee shall record the cumulative monthly coating usages. Beginning the first month after the first 12 calendar months of operation under this permit, the permittee shall record the rolling 12-month summation of the monthly coating usages.
  - g. The number of gallons of each cleanup material employed.
  - h. The total gallons of all cleanup material employed (summation of g).
  - i. During the first 12 calendar months of operation under this permit, the permittee shall record the cumulative monthly cleanup material usages. Beginning the first month after the first 12 calendar months of operation under this permit, the permittee shall record the rolling 12-month summation of the monthly cleanup material usages.
2. The permittee shall (in conjunction with the information required in A.III.1) collect and record the following information each month for purposes of determining annual VOC emissions:
- a. The total VOC emissions from each coating employed (A.III.1.b x A.III.1.d).
  - b. The total combined VOC emissions, tons per month and total tons, to date, for the calendar year from all coatings (summation of A.III.2.a).
  - c. The total VOC emissions from each cleanup material (A.III.1.b x A.III.1.g).
  - d. The total combined VOC emissions, tons per month and total tons, to date, for the calendar year from all cleanup materials (summation of A.III.2.c).

#### **IV. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the 570 lb VOC/month from cleanup operations.
- 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings or clean up material. 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 45 days after the exceedance occurs.
- 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
  - a. The rolling, 12-month coating usage limitation and, for the first 12 calendar months of operation under this permit, all exceedances of the maximum allowable cumulative coating usage levels.
  - b. The 3.7 lbs VOC/gal coating restriction
  - c. The rolling, 12-month cleanup usage limitation and, for the first 12 calendar months of

operation under this permit, all exceedances of the maximum allowable cumulative cleanup usage levels.

- d. The 5.7 lbs OC/gal restriction for clean up material.

These reports shall be submitted in accordance with Part 1 - General Terms and Conditions of this permit under section (A)(1).

The permittee shall also submit annual reports which specify the total VOC emissions from coating operations and total VOC emissions from cleanup operations for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

- 1. Compliance with the emission limitations in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

3.7 lbs VOC/gal excluding water and exempt solvents, from the application of end sealing compound coatings

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the recordkeeping requirements specified in section A.III\*.

\*Formulation data or US.EPA Method 24 shall be used to determine the VOC contents of the coatings.

- b. Emission Limitation:

1.43 TPY VOC from cleanup operations

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the recordkeeping requirements specified in section A.III.

- c. Emission Limitation:

28.86 TPY VOC from the use of coating materials

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the recordkeeping requirements

specified in section A.III.

d. Emission Limitation:

10.36 lbs VOC/hr

Applicable Compliance Method:

The hourly VOC emission limitation is based on the emission units potential to emit\*. Therefore, no hourly recordkeeping deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit for this emissions unit was based on a maximum VOC content of 3.7 lbs/gal and a maximum usage rate of 2.8 gal/hr

e. Emissions Limitation:

570 lbs VOC/month from cleanup material

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the recordkeeping requirements specified in section A.III.2.c.

**VI. Miscellaneous Requirements**

None.

**B. State Only Enforceable Section**

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

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>                                   | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| 3-piece can end sealing compound coating operation (food can end press line #2) | none                                 | none   |

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.