



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43266-0149
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George V. Voinovich
Governor

Donald R. Schregardus
Director

Re: Permit to Install
Stark County
Application No: 15-859

CERTIFIED MAIL

August 26, 1992

CENTRAL STATES CAN COMPANY
EDWIN GRIFFITH
P. O. BOX 642
MASSILLON, OH 44648-0642

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.

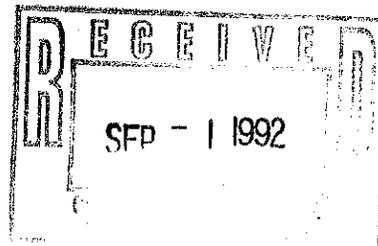
You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It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

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
CANTON AIR POLLUTION CONTROL



Permit to Install Terms and Conditions

Application No. 15-859
APS Premise No. 1576130634
Permit Fee: \$200.00

Name of Facility: CENTRAL STATES CAN COMPANY

Person to Contact: EDWIN GRIFFITH

Address: P. O. BOX 642
MASSILLON, OH 44648-0642

Location of proposed source(s): 700 - 16TH STREET SE
MASSILLON, OHIO

Description of proposed source(s):
2 PIECE AND 3 PIECE CAN END SEALING CAN COATING.

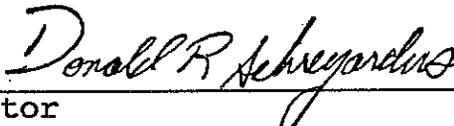
Date of Issuance: August 26, 1992

Effective Date: August 26, 1992

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(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 source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code (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.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a \$15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for CENTRAL STATES CAN COMPANY located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
K026	Two and Three Piece Can End Sealing Compound; B-73 Blank Line	Catalytic Incinerator; Limit of Hours of Operation and Number of Ends; Use of Coating with VOC Content Not Greater Than 4.4 lbs of VOC per Gallon of Coating-Excluding Water	3745-31-05 3745-21-09 (D)(1)(e) 3745-21-09 (D)(2)(e)	2.33 lbs OC/hr 53.6 lbs OC/day 8 tons OC/year <u>Operational Limits</u> 23 hrs/day 6900 hrs/yr 110,400 ends/day 331,200,000 ends/yr 690 gals cleanup solvent/year

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	8

CONSTRUCTION STATUS

The Canton Air Pollution Control shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: K026.

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization

of the emissions from the source and/or the performance of the control equipment.

1. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

3. Tests shall be performed for the following sources and pollutants:

Source

Pollutant(s)

K026

Organic Compounds

4. Tests shall include a determination of the uncontrolled mass rate of emissions.

MONITORING REQUIREMENTS

An Incinerator Exhaust Gas Temperature monitor shall be installed on the K026. The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR Part 60 - Standards of Performance for New Stationary Sources.

Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 1. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR Parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of opacity values in excess of the limitations specified in OAC Rule 3745-17-07 or any limitations specified in the terms and conditions of this permit. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1 and November 1 of each year and shall cover the data obtained during the previous calendar quarters.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 218 Cleveland Ave. SW, 3rd Floor, City Hall, Canton, Ohio 44702.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 218 Cleveland Ave. SW, 3rd Floor, City Hall, Canton, Ohio 44702.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance test conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with written certification (see enclosed form) that the facility has 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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Record-Keeping and Reporting Requirements for Surface Coating Lines:

This facility shall maintain daily records which list the following information for each surface coating or ink employed in this source.

- a. the company identification of the surface coating;
- b. the number of gallons employed;
- c. the VOC content, in pounds of VOC per gallon of coating;
- d. the VOC content, in pounds of VOC per gallon of coating; minus water;
- e. the water content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume; and
- g. the type and amount of cleanup solvent employed.

These daily records, as well as any supporting coating or ink analyses and computations, shall be retained in the company's files for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review. Copies of these records will be made available upon request.

This facility shall submit semi-annual reports to the Canton City Health Department, Air Pollution Control Division, City Hall, Canton, Ohio 44702, Phone (216) 489-3385, which summarize the following information for each coating employed in this source during the previous six calendar months: coating identification of the surface coating; the total number of gallons employed; the VOC content in pounds of VOC per gallon of coating; the VOC content (in pounds VOC per gallon of coating, minus water); the water content; the nonvolatile (solids) content; and the type and amount of cleanup solvent employed. The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

2. This facility shall continuously monitor and record the temperature of the exhaust gases from the catalytic incinerator serving this source. The temperature records shall be retained in this facility's files for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

A catalyst inlet temperature control set point of not less than 600°F shall be maintained for air flow into the incinerator except during periods of start-up and shutdown. Average actual catalyst outlet temperature to be 650°F or higher except during periods of start-up and shutdown.

This facility shall submit semi-annual reports which provide the following information for each period during which the average incinerator exhaust gas temperatures fall below 650°F:

- a. the date of the excursion;
 - b. the time interval over which the excursion occurred;
 - c. the temperature values during the excursion;
 - d. the cause(s) for the excursion; and
 - e. the corrective action which has been or will be taken to prevent similar excursions in the future.
3. Within 90 days of start-up of this source, this facility shall conduct, or have conducted, emission tests for this source in order to demonstrate compliance with the allowable VOC emission limitation. The emission tests shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the source operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in this agency's refusal to accept the results of the emission tests.

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Both the destruction efficiency of the incinerator and the capture efficiency shall be determined.

4. No more than 690 gallons of cleanup solvent will be used annually.
5. Only nonphotochemically reactive cleanup solvents will be employed.
6. This source shall not employ any coating that has a VOC content greater than 4.4 lbs organic compound per gallon of coating minus water.

3.7?