



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

03/27/97

CERTIFIED MAIL

02-47-00-0796

RE: Final Chapter 3745-35 Permit To Operate

Columbia Container, Inc.
Leonard C. Sotz Mr.
13676 North Station Road
Columbia Station, OH 44028

Dear Leonard C. Sotz

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but 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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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 Review Appeals Commission 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 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

If you have any questions, please contact the Northeast District Office at (216) 425-9171

Very truly yours,

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

cc: Northeast District Office



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 03/27/97

Facility ID: 02-47-00-0796

Expiration Date: 03/27/00

FINAL ISSUE

This document constitutes issuance for: **Columbia Container, Inc.**
13676 North Station Road
Columbia Station, OH 44028

of a permit to operate for:

K001 (Misc Metal Parts & Products Coating Line)
Spray Booth & Bake Oven used to coat/paint Steel Drums (both interior & exterior surfaces).

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner

Reports of any required monitoring and/or recordkeeping 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 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(216) 425-9171

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

Part II: Special Terms and Conditions

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint Spray Booth and Bake Oven used to coat steel drums.	OAC Rule 3745-21-09 (U) (1) OAC Rule 3745-35-07 PTI No. 02-3467	a) 4.3 lbs of VOC/gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum; b) 3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum.

2. Additional Terms and Conditions

- 2.a. The VOC emissions from this emissions unit shall not exceed the following limits:
- i. 1.52 tons VOC per calendar month; and
 - ii. 18.1 tons VOC per year.
- 2.b. The hazardous air pollutant (HAP) emissions from this emissions unit shall not exceed the following limits:
- i. xylene- 0.76 ton per calendar month and 9.1 tons per year;
 - ii. methyl ethyl ketone- 0.32 ton per calendar month and 3.74 tons per year; and
 - iii. other combined HAPs (including toluene, M.I.B.K., formaldehyde, methanol, ethyl benzene and diethanolamine)- 0.24 ton per calendar month and 2.78 tons per year.

B. Operational Restrictions

1. None.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - (a) The name and identification number of each coating, as applied.
 - (b) The VOC and HAPs content of each coating (excluding water and exempt solvents), as applied.
 - (c) The number of gallons (excluding water and exempt solvents) of each coating employed.
 - (d) The name and identification of each cleanup material employed.
 - (e) The VOC and HAPs content of each cleanup material, in pounds per gallon.
 - (f) The number of gallons of each cleanup material employed.
 - (g) The VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
 - (h) The emissions of xylene from all coatings and cleanup materials employed, in pounds or tons.
 - (i) The emissions of methyl ethyl ketone from all coatings and cleanup materials employed, in pounds or tons.
 - (j) The emissions of all other combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director of any monthly record showing the use of noncomplying coatings, or of the exceedance of any VOC or HAP emission limitation listed in this permit. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which summarize the emissions of VOC, xylene, methyl ethyl ketone and other combined HAPs from all coatings and cleanup materials employed in this emissions unit during the previous calendar year. The reports shall be submitted by February 1 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation: 4.3 lbs. VOC/gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum; and 3.5 lbs. VOC/gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum.	Applicable Compliance Method: U.S. EPA Method 24 U.S. EPA Method 24
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2. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC Rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A.2, C, D, and E.