



State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.  
Columbus, Ohio 43216-3669  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

Re: Permit to Install  
Fairfield County  
Application No: 01-5176  
TOXIC REVIEW

CERTIFIED MAIL

December 29, 1994

ANCHOR HOCKING PACKAGING COMPANY  
EDWARD T. SCHOTT  
1765 W. FAIR AVE.  
LANCASTER, OH 43130

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, 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 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 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  
CENTRAL DISTRICT OFFICE, DAPC

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EPA 1613 (rev. 5/94)



## Permit to Install Terms and Conditions

Application No. 01-5176  
APS Premise No. 0123010255  
Permit Fee: \$1800.00

Name of Facility: ANCHOR HOCKING PACKAGING COMPANY

Person to Contact: EDWARD T. SCHOTT

Address: 1765 W. FAIR AVE.  
LANCASTER, OH 43130

Location of proposed source(s): 940 MILL PARK DR.  
LANCASTER, OHIO

Description of proposed source(s):  
CLOSURE MANUFACTURING FACILITY.

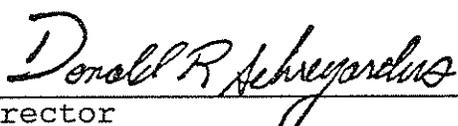
Date of Issuance: December 29, 1994

Effective Date: December 29, 1994

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

  
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Director

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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 SOURCES(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 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

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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 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.

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 tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for ANCHOR HOCKING PACKAGING COMPANY located in Fairfield 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 &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
F001	Plant roadways/ parking areas	Compliance with additional terms and conditions	3745-31-05	0.3 ton PM/yr See additional terms and conditions
K001	Plastisol coating w/ curing oven (PCO-1-38/ FBE-PCO-1-38)	Compliance w/air toxics policy and permitted emissions limits and use of natural gas as fuel	3745-31-05 3745-17-07 3745-17-11 3745-21-09 (U)(1)(i)	0.95 lb OC/hr, 3.0 lbs VOC/gal of coating minus water and exempt solvents, 0.02 lb/ MMBTU heat input, 20% opacity as a six minute average, 4.3 tons OC/yr
K002	Plastisol coating w/ curing oven (PCO-2-51/PT FBE-PCO-51 PT)	Compliance w/air toxics policy and permitted emissions limits and use of natural gas as fuel	3745-31-05 3745-17-07 3745-17-11 3745-21-09 (U)(1)(i)	0.17 lb OC/hr, 3.0 lbs VOC/gal of coating minus water and exempt solvents, 0.02 lb/ MMBTU heat input, 20% opacity as a six minute average, 0.73 tons OC/yr
K003	Metal closure coating line (LTG-1/FBE-1)	Compliance w/air toxics policy, per-	3745-31-05 3745-17-07 3745-17-11	19.6 lbs OC/hr, 1.01 lbs VOC/gal of solids applied,

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		mitted emissions limits and emissions control requirements	3745-21-09 (U)(1)(i)	85.8 tons OC/yr 20% opacity as a six minute average, 0.02 lb PM/hr, 95% overall OC/VOC control
K004	Metal closure coating line (LTG-1/FBE-2)	Compliance w/air toxics policy, per- mitted emissions limits and emissions control requirements	3745-31-05 3745-17-07 3745-17-11 3745-21-09 (U)(1)(i)	19.6 lbs OC/hr, 1.01 lbs VOC/gal of solids applied, 85.8 tons OC/yr 20% opacity as a six minute average, 0.02 lb PM/hr, 95% overall OC/VOC control
K005	Metal closure flat sheet coating/print- ing (LTG-3/ FBE-3)	Compliance w/air toxics policy, per- mitted emissions limits and emissions control requirements	3745-31-05 3745-17-07 3745-17-11 3745-21-09 (U)(1)(i)	11.2 lbs OC/hr, 1.17 lbs VOC/gal of solids applied, 49.1 tons OC/yr 20% opacity as a six minute average, 0.01 lb PM/hr, 95% overall OC/VOC control
P001	Coating mix Area-1 (CMA-1)	Use of tightly fitting lids and compliance w/permitted limits	3745-31-05 3745-21-07	1.5 lbs OC/hr See additional terms and conditions 6.67 tons OC/yr
P002	Coating mix Area-2 (CMA-2)	Use of tightly fitting lids and compliance w/permitted limits	3745-31-05 3745-21-07	2.5 lbs OC/hr 40.0 lbs OC/day, See additional terms and conditions 7.3 tons OC/yr
P003	Coating mix Area-3 (CMA-3)	Use of tightly fitting lids and compliance w/permitted limits	3745-31-05 3745-21-07	1.3 lbs OC/hr See additional terms and conditions 5.7 tons OC/yr

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**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC/VOC	245.2
PM	0.93
NO <sub>x</sub>	6.6
SO <sub>2</sub>	0.04
CO	1.4

**CONSTRUCTION STATUS**

The OEPA Central District Office - DAPC 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: K001 - K005, P001 - P003.

**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 describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, 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.

- A. 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.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

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<u>Source</u>	<u>Pollutants</u>
K003	OC/VOC (capture and destruction)
K004	OC/VOC (capture and destruction)
K005	OC/VOC (capture and destruction)

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

#### 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 three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any 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 OEPA Central District Office - DAPC, 2305 Westbrooke Drive, Bldg. C, Box 2198, Columbus, Ohio 43266-2198.

#### 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 OEPA Central District Office - DAPC, 2305 Westbrooke Drive, Bldg. C, Box 2198, Columbus, Ohio 43266-2198.

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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.

#### 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.

#### ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. As part of the Best Available Technology (BAT) requirements for emissions units K003, K004 and K005 this facility shall employ a Permanent Total Enclosure and vent all OC/VOC emissions from these emissions units to a thermal incinerator which results in a minimum Destruction and Removal Efficiency (DRE) of 95% by weight.
2. The Permanent Total Enclosure(s) employed on K003, K004 and K005 shall be installed and maintained to meet all design requirements specified by draft EPA Method 30, as published 12/29/92 in the Federal Register.
3. Prior to startup of K003, K004 or K005, this facility shall submit a monitoring plan (two copies) for the OC/VOC capture system to the Ohio EPA, Central District Office for approval. The monitoring plan shall include the following information, as a minimum:
  - a. the parameter(s) to be continuously measured and recorded for verifying the OC/VOC emissions capture efficiency;
  - b. the manufacturer of the monitoring device(s) and recording instrumentation;
  - c. a Quality Assurance/Quality Control plan to ensure the monitor is maintained and operated in accordance with manufacturers specifications. The QA/QC plan shall specify, as a minimum, calibration procedures and frequency, acceptable specifications/ranges for

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evaluating operation of the monitor, procedures for correcting problems/deficiencies found with the instruments during QA/QC activities and a contingency monitoring plan in the event the monitor malfunctions or becomes inoperable.

This facility shall maintain a log identifying all QA/QC activities performed, results of any instrument calibrations performed and any corrective activities performed in the event the monitor/instrumentation is found to be malfunctioning or inoperable. The log shall identify the person(s) performing each activity as well as the date the activity is performed upon.

Prior to submittal to Ohio EPA, the QA/QC plan shall be submitted to the manufacturer(s) of the instrumentation for review and comment. A copy of the manufacturer's comments regarding the QA/QC plan shall be submitted to the Ohio EPA with the plan.

Upon startup of K003, K004 or K005 this facility shall maintain and operate a monitoring system that continuously measures and records the values of the parameter(s) chosen to verify the OC/VOC capture rate during operation of emissions units K003, K004 and/or K005.

4. This facility shall install and operate instrumentation sufficient to continuously monitor and record the combustion chamber exhaust gas temperature (prior to any heat exchanger) of the incinerators employed on K003, K004 and/or K005. The monitor shall be installed and maintained in accordance with manufacturer's specifications and have an accuracy of (+/-) 1.0 percent of the temperature being monitored.
5. This facility shall install, maintain and utilize tightly fitting lids during operation of all mixing vessels operated as part of emissions units P001, P002 and P003.
6. All cleanup operations conducted on emissions units K003, K004 or K005 shall be conducted with the respective Permanent Total Enclosure intact and with the thermal incinerator operating at the minimum allowable combustion chamber exhaust gas temperature specified by additional term and condition #7.
7. The combustion chamber exhaust gas temperature for the incinerators employed on emission units K003, K004 and K005 shall be maintained at a minimum of 1400.0 Fahrenheit (f) unless, and until compliance with control requirements is demonstrated at an alternative minimum combustion chamber exit gas temperature.

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8. This facility shall maintain monthly records of all coatings and cleanup materials employed in each emissions unit (K001, K002, K003, K004 and K005). These records shall contain the following information, as a minimum:
- a. the company identification for each material;
  - b. the OC and VOC content (lb/gallon), as applied, for each material;
  - c. the as applied VOC content, minus water and exempt solvents, (lb/gal-water & exempt solvents) for each coating employed; and
  - d. the as applied water and solids content, in percent by volume, for each coating employed;

All OC and VOC contents shall be determined in accordance with methods specified by OAC rule 3745-21-10.

The above records, and any supporting calculations and analyses, shall be retained in the facility's files for a period of not less than three years and shall be made available to the Director, or any authorized representative of the Director, for review upon request.

9. This facility shall submit all reports for emissions units K001, K002, K003, K004 and K005 in accordance with all specifications of OAC rule 3745-21-09(B).
10. There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any sixty minute observation period.
11. In order to minimize fugitive particulate emissions from plant roadways and parking areas this facility shall:
- a. utilize all paved plant roadways and parking area;
  - b. at a minimum, conduct weekly sweeping of all roadways and parking areas;
  - c. post and enforce a maximum speed limit of fifteen (15) miles per hour on plant roadways; and
  - d. any material carried off of the facility's property and deposited onto public streets by vehicular traffic or by erosion by water, shall be promptly removed and disposed of properly in such manner as to minimize and prevent resuspension.

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12. For the purpose of quantifying emissions, from emission units P001, P002 or P003, for determining compliance with the requirements/limits of this permit and applicable rules, this facility shall utilize an emissions factor of 1.0% of the weight of solvent mixed.
13. All plant, roadways and parking areas shall be paved.

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