Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

10/21/2015

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Rick Garcia
Ball Metal Beverage Container Corporation
12340 Township Road 99
Findlay, OH 45840

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0332000023
Permit Number: P0119172
Permit Type: Administrative Modification
County: Hancock

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Courier. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
Ohio EPA-NWDO; Michigan; Indiana; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Administrative Modification
Ball Metal Beverage Container Corporation
12340 Township Road 99,,Findlay, OH 45840
ID#:P0119172
Date of Action: 10/21/2015
Permit Desc:Administrative modification to remove VOC emissions associated with clean-up (6.6 tons/year) and change the weekly recordkeeping requirements to monthly..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Jan Tredway, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Ball Metal Beverage Container Corporation

Facility ID:	0332000023
Permit Number:	P0119172
Permit Type:	Administrative Modification
Issued:	10/21/2015
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Ball Metal Beverage Container Corporation

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Authorization

Facility ID:	0332000023
Facility Description:	Metal Cans
Application Number(s):	M0003386
Permit Number:	P0119172
Permit Description:	Administrative modification to remove VOC emissions associated with clean-up (6.6 tons/year) and change the weekly recordkeeping requirements to monthly.
Permit Type:	Administrative Modification
Permit Fee:	$100.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/21/2015
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

Ball Metal Beverage Container Corporation
12340 Township Road 99
Findlay, OH 45840

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119172
Permit Description: Administrative modification to remove VOC emissions associated with clean-up (6.6 tons/year) and change the weekly recordkeeping requirements to monthly.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K003**
Company Equipment ID:	Can Line 3
Superseded Permit Number:	03-10642
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) 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 re-issuance, or modification.

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, 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 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.

4. Monitoring and Related Record Keeping 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:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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 theOhio EPA DAPC, Northwest District Officein 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).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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:

(1) 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.

(2) 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.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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 Ohio EPA DAPC, Northwest District Office 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

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. Reporting 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 Ohio EPA DAPC, Northwest District Office.

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 theOhio EPA DAPC, Northwest District Office. 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, 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.)

10. 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)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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 operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services"facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emission unit contained in this permit is subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart KKKK (Surface Coating of Metal Cans): K003. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions

1. K003, Can Line 3

Operations, Property and/or Equipment Description:

2-Piece Steel Food Can Manufacturing Line

a) 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) d)(4) through d)(6).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [administrative modification of PTI #03-10642 to remove emissions from cleanup]	<u>Coating Emissions</u> 62.6 lbs of volatile organic compounds (VOC)/hour, excluding cleanup materials; 1.06 lbs of particulate emissions (PE)/hour; 4.60 tons of PE/year <u>Natural Gas Combustion Emissions</u> 1.08 lbs of nitrogen oxides (NOx)/hour; 4.71 tons of NOx/year 0.06 lb of VOC (VOC)/hour; The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart KKKK, OAC rule 3745-17-11(C), OAC rule 3745-31-05(D), and OAC rule 3745-21-09(D).
b.	OAC rule 3745-31-05(D)	194.18 tons VOC/rolling 12-month period, excluding cleanup materials See b)(2)a.
c.	OAC rule 3745-21-09(D)	4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an interior body coating line
d.	OAC rule 3745-17-11(C)	See b)(2)b.
e.	40 CFR Part 60 Subpart WW	Exempt [see b)(2)c.]
f.	40 CFR Part 63 Subpart KKKK	See 40 CFR Part 63.3490(b)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Organic hazardous air pollutants shall not exceed 0.06 kg/liter (0.51 lb/gal) of coating solids during each compliance period See b)(2)f.
g.	40 CFR 63.1-15 (40 CFR 63.3501)	Table 5 to Subpart KKKK of 40 CFR Part 63 – Applicability of General Provisions to Subpart KKKK shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

a. The VOC emissions for all coatings (excluding cleanup materials) shall not exceed 194.18 tons of VOC per rolling 12-month period.

b. Pursuant to OAC rule 3745-17-11(C)(3), any surface coating process with a Permit to Install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of this rule.

c. This emissions unit is not subject to the requirements of 40 CFR Part 60 Subpart WW because it is a steel food container manufacturing line.

d. The 62.6 lbs of VOC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

e. The 1.08 lbs of NOx/hour and 0.06 lb of VOC/hour emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limitations.

f. The permittee shall comply with the emission limitation for this emissions unit by using one of the following compliance options below:

40 CFR Part 63.3491(a) – compliant material option

40 CFR Part 63.3491(b) – emission rate without add-on controls option

c) Operational Restrictions

(1) Each coating employed in this emissions unit shall comply with the VOC content restriction specified in section b)(1)c. on an "as applied" basis.

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

d) Monitoring and/or Recordkeeping Requirements

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

(2) The permittee shall maintain monthly records that list the following information for this emissions unit:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in lbs/gallon of coating and lbs/gallon of coating, excluding water and exempt solvents (Note: if the permittee mixes compliant coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.);

c. the number of gallons of each coating employed;

d. the VOC emission rate from each coating employed [d)(3)b. x d)(3)c.], in pounds;

e. the VOC emission rate from all coatings employed [summation of d)(3)d. for all coatings], in tons; and

f. the rolling 12-month summation of the monthly VOC emission rates for all coatings employed, in tons.

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements as per 40 CFR Part 63, Subpart KKKK, including the following sections:

a. A copy of each notification and report that you submitted to comply with this subpart and the documentation supporting each notification and report. [40 CFR 63.3512(a)]

b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating and thinner and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.3512(b)]

c. A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option. [40 CFR 63.3512(c)(1)]

d. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of 63.3521. [40 CFR 63.3512(c)(2)]

e. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings and thinners used each month, using Equations 1, 1A through 1C, and 2 of 63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 63.3531(e)(3); the calculation of the total volume of coating solids used each month, using Equation 2 of 63.3531; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 63.3531. [40 CFR 63.3512(c)(3)]

f. A record of the name and volume of each coating and thinner used during each compliance period. [40 CFR 63.3512(d)]

g. A record of the mass fraction of organic HAP for each coating and thinner used during each compliance period. [40 CFR 63.3512(e)]

h. A record of the volume fraction of coating solids for each coating used during each compliance period. [40 CFR 63.3512(f)]

i. A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner used during each compliance period. [40 CFR 63.3512(g)]

j. If you use an allowance in Equation 1 of 63.3531 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, or disposal facility (TSDF) according to 63.3531(e)(3) or otherwise managed in accordance with applicable Federal and State waste management regulations, you must keep the following records of the information specified in paragraphs (h)(1) through (3) of 40 CFR 63.3512:

   i. The name and address of each TSDF or other applicable waste management location to which you sent waste materials for which you use an allowance in Equation 1 of 63.3531, a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility and the date of each shipment. [40 CFR 63.3512(h)(1)]

   ii. Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of 63.3531. [40 CFR 63.3512(h)(2)]

   iii. The methodology used in accordance with 63.3531(e)(3) to determine the total amount of waste materials sent to or the amount collected, stored,

and designated for transport to a TSDF or other applicable waste management location each month and the methodology to determine the mass of organic HAP contained in these waste materials. That must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [40 CFR 63.3512(h)(3)]

k. You must keep records of the date, time, and duration of each deviation. [40 CFR 63.3512(i)]

l. Your records must be kept in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR 63.3513(a)]

m. As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.3513(b)]

n. You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b). You may keep the records off site for the remaining 3 years. [40 CFR 63.3513(c)]

(4) The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified in the PTI 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 PTI 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: n-butanol
TLV (mg/m3): 152
Maximum Hourly Emission Rate (lbs/hr): 63.10
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 855.10
MAGLC (ug/m3): 2,667.24

(5) Physical changes to or changes to 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 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 (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, of 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 or 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(W)(1)(a)(ii), and a modification of the existing PTI will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (W)(1)(a)(ii)), then the permittee shall obtain a final PTI prior to the change.

(6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

e) Reporting Requirements

(1) The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

(2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

(3) The permittee shall submit quarterly deviation reports that identify the following:

a. all exceedances of the rolling 12-month VOC limitation of 194.18 tons.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(4) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(5) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as required pursuant to 40 CFR Part 63 Subpart KKKK, per the following sections:

40 CFR Part 63.3511(a) – semiannual compliance report

(6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>
62.6 lbs of VOC/hour

<u>Applicable Compliance Method</u>
The permittee may demonstrate compliance with this limitation by multiplying the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all coatings employed (lbs/gallon).

If required, the permittee shall demonstrate compliance pursuant to Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60 Appendix A.

b. <u>Emission Limitation</u>
194.18 tons of VOC per rolling 12-month period

<u>Applicable Compliance Method</u>
Compliance with this limitation shall be based upon the recordkeeping requirements in section d)(2) of this permit.

c. <u>Emission Limitation</u>
1.06 lbs of PE/hour; 4.60 tons of PE/year

<u>Applicable Compliance Method</u>
To determine the actual worst case PE rate (E), the following equation may be used for the paint spraying operation:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in lbs/hour x (1 – TE) x (1 – CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 80%)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly emission limit in accordance with Methods 1-5 of 40 CFR Part 60 Appendix A.

The annual limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8760 hours/year and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

d. Emission Limitation
Visible PE shall not exceed 20% opacity as six-minute average, except as provided by rule

Applicable Compliance Method
If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

e. Emission Limitation
1.08 lbs of NOx/hour; 4.71 tons of NOx/year (from natural gas combustion)

Applicable Compliance Method
The permittee may demonstrate compliance with the hourly limitation by multiplying the maximum hourly natural gas consumption rate (mmft^3/hr) by the emission factor from AP-42, Table 1.4-1 (revised 07/98) of 100 lbs of NOx/mmft^3.

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation pursuant to Methods 1-5 and 7 of 40 CFR Part 60 Appendix A.

The annual limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8760 hours/year and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

f. Emission Limitation
0.06 lb of VOC/hour (from natural gas combustion)

Applicable Compliance Method
The permittee may demonstrate compliance with the hourly limitation by multiplying the maximum hourly natural gas consumption rate (mmft^3/hr) by the emission factor from AP-42, Table 1.4-1 (revised 07/98) of 5.5 lbs of VOC/mmft^3.

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation pursuant to Method 18, 25, or 25A of 40 CFR Part 60 Appendix A.

g. Emission Limitation
4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents (from an interior body coating line)

Applicable Compliance Method
The permittee shall demonstrate compliance with the VOC content limitation based on the monitoring and recordkeeping requirements specified in section d)(2).

h. Emission Limitation
Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period

Applicable Compliance Method
Compliance shall be demonstrated in accordance with 40 CFR Part 63.3522(a) through 63.3522(d) for the compliant material option or 40 CFR Part 63.3532(a) through 63.3532(d) for the emission rate without add-on controls option.

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.