



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

3/14/2016

Phillip Cesen  
 Silgan Containers Manufacturing Corporation  
 12-733 St Route 110  
 Suite 101  
 Napoleon, OH 43545

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0335010053  
 Permit Number: P0120045  
 Permit Type: Initial Installation  
 County: Henry

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA  
Ohio EPA-NWDO; Michigan; Indiana; Canada



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Silgan Containers Manufacturing Corporation**

Facility ID:	0335010053
Permit Number:	P0120045
Permit Type:	Initial Installation
Issued:	3/14/2016
Effective:	3/14/2016





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Silgan Containers Manufacturing Corporation

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**Final Permit-to-Install**  
Silgan Containers Manufacturing Corporation  
**Permit Number:** P0120045  
**Facility ID:** 0335010053  
**Effective Date:** 3/14/2016

## Authorization

Facility ID: 0335010053  
Facility Description: Can making  
Application Number(s): A0054838  
Permit Number: P0120045  
Permit Description: Initial Installation for two outside stripe applicators  
Permit Type: Initial Installation  
Permit Fee: \$400.00  
Issue Date: 3/14/2016  
Effective Date: 3/14/2016

This document constitutes issuance to:

Silgan Containers Manufacturing Corporation  
12-733 St Route 110  
Suite 101  
Napoleon, OH 43545

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

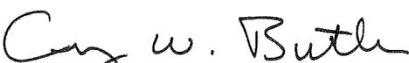
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



**Final Permit-to-Install**  
Silgan Containers Manufacturing Corporation  
**Permit Number:** P0120045  
**Facility ID:** 0335010053  
**Effective Date:** 3/14/2016

## Authorization (continued)

Permit Number: P0120045

Permit Description: Initial Installation for two outside stripe applicators

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

**Group Name: Outside Stripe Applicators**

<b>Emissions Unit ID:</b>	<b>K031</b>
Company Equipment ID:	K040
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K032</b>
Company Equipment ID:	K041
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Silgan Containers Manufacturing Corporation  
**Permit Number:** P0120045  
**Facility ID:** 0335010053  
**Effective Date:** 3/14/2016

## **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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) 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, and reporting requirements 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 the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

## 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 the Ohio 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 obtained before 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 entered upon 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.



**Final Permit-to-Install**  
Silgan Containers Manufacturing Corporation  
**Permit Number:** P0120045  
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**Effective Date:** 3/14/2016

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
Silgan Containers Manufacturing Corporation  
**Permit Number:** P0120045  
**Facility ID:** 0335010053  
**Effective Date:** 3/14/2016

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.



**Final Permit-to-Install**  
Silgan Containers Manufacturing Corporation  
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## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group -Outside Stripe Applicators: K031,K032,**

EU ID	Operations, Property and/or Equipment Description
K031	Outside Stripe Applicator No. 1
K032	Outside Stripe Applicator No. 2

- 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) b)(1)e., b)(1)f., b)(2)d. and 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(D)	3.7 lbs volatile organic compounds (VOC)/hr, from coating operations (from each emissions unit individually)  157 lbs VOC/month, from cleanup operations (from each emissions unit individually)  9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs (for emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined) [See b)(2)b.ii.]  The VOC emissions from emissions units K005-6, K008-17, K019-24, K026-28, K031, and K032, combined, shall not exceed 249.5 tons per rolling, 12-month period. [See b)(2)b.i.]
b.	OAC rule 3745-21-09(D)(2)(d)	5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (for side-seam coatings)
c.	ORC 3704.03(T)	See b)(2)c.
d.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(E) [State-only enforceable restrictions to ensure compliance with ORC 3704.03(F)(4)(b) (Toxic Air Contaminant Statute)]	Xylene emissions from K031 and K032, combined, shall be less than 1.0 ton per year.  See b)(2)d.
f.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(6)

(2) Additional Terms and Conditions

- a. The PM10 emissions from emissions units K031 and K032 are negligible and, therefore, are not addressed in this permit.
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) and Maximum Achievable Control Technology (MACT) regulations:
  - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, K026-28, K031 and K032, combined; and
  - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.
- c. The BAT requirements for VOC emissions established under this rule are equivalent to the requirements established pursuant to OAC rule 3745-21-09(D)(2)(d) for each emissions unit.
- d. The state-only enforceable limitations for xylene emissions are being established to ensure compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F)(4) through conformity with the Ohio EPA document entitled "Review of New Sources of Air Toxics Emissions, Option A" as indicated in ORC 3704.03(F)(4)(a). The state-only enforceable limitations will result in no modeling being necessary to demonstrate compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F)(4)(b) because the maximum annual emissions for all toxic air contaminants (including xylenes) from K031 and K032 will be less than 1.0 ton per year [See d)(6)].

c) Operational Restrictions

- (1) The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined, shall be limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(V_i G_i)(1 - R_i \times \frac{K}{100})] \div \frac{2000 \text{ lbs}}{\text{ton}} \geq 249.5$$

where:

M = the increment of the rolling 12-month period;

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

- (2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating employed, as applied, in lbs/gal, excluding water and exempt solvents
- (2) The permittee shall collect and record the following information each month for the cleanup materials employed in each emissions unit
  - a. the name and identification number for each cleanup material employed;
  - b. the volume, in gallons, of each cleanup material employed;
  - c. the VOC content, in pounds/gallon, for each cleanup material employed;

- d. the amount of VOC emitted from each cleanup material employed [d)(2)b. x d)(2)c.], in pounds; and
  - e. the total amount of VOC emitted from all cleanup materials employed [summation of d)(1)d.], in pounds.
- (3) The permittee shall collect and record the following information each month for all the coatings and cleanup material employed in emission units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed [d)(3)b. x d)(3)c.];
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in d)(3)b. and d)(3)c. and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - f. the total VOC emission rate from all coatings and cleanup materials employed [summation of d)(3)d. and d)(3)e. for all coatings and cleanup materials], in pounds or tons; and
  - g. the rolling, 12-month VOC emission rate, in tons.
- (4) The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined;
- a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c.] where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in d)(4)b.

- and d)(4)c. above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
- f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(4)d. and d)(4)e. for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs, combined, from all the coatings and cleanup materials employed [summation of d)(4)f. for all coatings and clean up materials], in pounds; and
  - h. the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.
- (5) The permittee shall collect and record the following information each month for all coating materials employed in emission units K031 and K032, combined:
- a. the xylene content of each coating material employed, in pounds per gallons, as applied;
  - b. the volume, in gallons, of each coating material employed;
  - c. the xylene emission rate for each coating material employed [d)(5)a. x d)(5)b.], in pounds;
  - d. the cumulative monthly xylene emission rate for all coating materials employed [summation of d)(5)c. for all materials], in tons;
  - e. The annual, year-to-date xylene emissions, in tons, from all coating materials employed [summation of d)(5)d. for each month to date from January to December].
- (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) with 30 days following the end of the calendar month.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. all exceedances of the rolling, 12-month VOC emission limitation of 249.5 tons for the emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined;

- b. all exceedances of the maximum allowable cumulative coating and cleanup material usage rates; and
- c. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.0 tons, respectively (for emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined).

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

- (3) The permittee shall submit annual reports that summarize xylene emissions, in tons, from all coating materials employed. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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. Emission Limitation:

3.7 lbs VOC/hr, from coating operations from each emissions unit individually

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* of each emission unit. Therefore, no monitoring, record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this emission limitation.

\*The potential to emit is based on a maximum coating usage rate of 0.67 gal/hr and a maximum VOC content of 5.5 lbs/gal.

- b. Emission Limitation:

157 lbs VOC/month, from cleanup operations from each emissions unit individually

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

- c. Emission Limitation:

5.5 lbs VOC/gallon of coating, excluding water and exempt solvents (for side-seam coatings)



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

d. Emission Limitation:

Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(4) of this permit.

e. Emission Limitation:

The VOC emissions from emissions units K005, K006, K008-17, K019-24, K026-28, K031, and K032, combined, shall not exceed 249.5 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month and cumulative VOC emission limitations above shall be determined through the record keeping requirements established in d)(3) of this permit

f. Emission Limitation:

Xylene emissions from emissions units K031 and K032, combined, shall be less than 1.0 ton per year.

Applicable Compliance Method:

Compliance with this limitation shall be demonstrated through record keeping requirements in section d)(5).

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

g) Miscellaneous Requirements

(1) None.