

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 16-02491

A. Source Description

Sonoco-Phoenix Inc. (Brookline plant) is an existing facility located in the city of Green, Summit County, that manufactures two and three-piece metal can ends for packaging purposes in various industries. The facility consists of 20 emissions units, which were most recently permitted under PTIs 16-02154, 16-02359 and 16-02406. These emissions units consist of eight conversion presses (K005, K007, K009, K011, K013, K015, K017, and K019), nine blanked end liners (K001, K004, K006, K008, K010, K012, K016, K018, and K023), and three post-repair stations (K020, K021, and K022.) Sonoco-Phoenix proposes to install a new electrodeposition dip tank and electric oven as part of Line 104 (ECoater 104, emissions unit K024) and modify the combined annual allowable VOC emissions for the entire facility, thus superceding PTIs 16-02154, 16-02359, and 16-02406. Sonoco-Phoenix proposes these changes while maintaining the allowable annual emission rates such that the Brookline plant's facility-wide VOC emissions, and individual HAP and combined HAP emissions remain less than major Title V thresholds. In summary, the change is:

Installation of a new electrodeposition dip tank and electric oven as part of Line 104 (ECoater 104) to be emissions unit K024. The hourly VOC emission limit for this new emissions unit will be 0.09 pound per hour. The annual VOC emission limit for this new emissions unit will be 0.38 ton per year. VOC emissions from Liner 104 will be uncontrolled.

Other modifications will be made to the relevant conditions of PTIs 16-02154, 16-02359, and 16-02406 to be consistent with the proposed facility-wide VOC emission limit of 92.72 tons per year.

B. Facility Emissions and Attainment Status

The facility will emit VOC, combined HAPs, and individual HAPs from the above-mentioned sources. If Sonoco-Phoenix were to operate at the maximum hourly throughput of materials and for an entire calendar year, the total facility VOC emissions would be 191.90 tons, the highest individual HAP emissions would be 8.85 tons, and combined total HAP emissions would be 16.51 tons.

C. Source Emissions

Sonoco-Phoenix has agreed to restrict their facility's emissions to 92.72 tons of VOC, 9.0 tons for each individual HAP, and 24.0 tons for combined HAPs per 12-month period. This PTI will contain terms and conditions to limit Sonoco-Phoenix to the above identified emission limitations.

D. Conclusion

The terms and conditions in this Permit to Install will limit the facility's VOC, individual HAP, and combined HAP emissions to less than Title V thresholds, and will allow the facility to be classified as an area source for HAP emissions. Sonoco-Phoenix shall maintain monthly records of emissions and actual coating usage. Excursion reports will be required for each emissions unit to ensure compliance.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 16-02491

Fac ID: 1677000223

DATE: 8/21/2007

Sonoco Products Co Consumer Products Div
Tracy Speakman
3075 Brookline Rd
North Canton, OH 44720

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

ARAQMD

AKRON METRO AREA TRANS STUDY

WV

PA

SUMMIT COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **16-02491** FOR AN AIR CONTAMINANT SOURCE
FOR **Sonoco Products Co Consumer Products Div**

On 8/21/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sonoco Products Co Consumer Products Div**, located at **3075 Brookline Rd, North Canton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02491:

Electrodeposition Dip Tank and Electric Drying Oven.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 16-02491

Application Number: 16-02491
Facility ID: 1677000223
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sonoco Products Co Consumer Products Div
Person to Contact: Tracy Speakman
Address: 3075 Brookline Rd
North Canton, OH 44720

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3075 Brookline Rd
North Canton, Ohio**

Description of proposed emissions unit(s):

Electrodeposition Dip Tank and Electric Drying Oven.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described 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

Chris Korleski
Director

Sonoco Products Co Consumer Products Div
PTI Application: 16-02491
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1677000223

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) 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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of 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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Sonoco Products Co Consumer Products Div

Facility ID: 1677000223

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	92.72
Individual HAP	9.0
Combined HAP	24.0

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K024) - ECoater 104

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.9 below.
OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOCs is less than ten tons per year.
- 2.b The combined annual emissions from the entire facility (emissions units K001, K004 through K013, and K015 through K024 and all emissions units that are exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05) shall not exceed the following as rolling, 12-month summations:
 - i. 92.72 tons of VOC;
 - ii. 24.0 tons of all hazardous air pollutants (HAP); and
 - iii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not employ any coating material in this emissions unit that is in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt

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solvents.

2. The maximum annual VOC material usage (including coatings and cleanup materials) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, K019, and K024, combined, shall not exceed 49,414 gallons, based upon a rolling, 12-month summation of the monthly VOC material usage rates.

Note: These emissions units are uncontrolled when applying VOC containing material.

3. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following VOC material usage restrictions for the uncontrolled emissions units (See Section B.2 above):

Month(s)	Maximum Allowable Cumulative VOC Material Usage (including coatings and cleanup materials)
1	12,794 gallons
1-2	12,794 gallons
1-3	12,794 gallons
1-4	24,707 gallons
1-5	24,707 gallons
1-6	24,707 gallons
1-7	37,061 gallons
1-8	37,061 gallons
1-9	37,061 gallons
1-10	49,414 gallons
1-11	49,414 gallons
1-12	49,414 gallons

4. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC material (including coatings and cleanup materials) usage restriction shall be based upon a rolling, 12-month summation of the monthly VOC material usage rates.
5. The maximum annual VOC material usage (including coatings and cleanup materials) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound),

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K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the monthly VOC material usage rates.

Note: These unit are controlled when applying VOC containing material.

6. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following VOC material usage restrictions for the controlled emissions units (see Section B.5 above):

Month(s)	Maximum Allowable Cumulative VOC Material Usage (including coatings and cleanup materials)
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

7. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material (including coatings and cleanup materials) usage restriction shall be based upon a rolling, 12-month summation of the monthly VOC material usage rates.
8. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020,

Emissions Unit ID: **K024**

K021, K022, and K023.

9. By limiting the coatings and cleanup materials usage in accordance with sections B.2 and B.5, the entire facility will emit VOC, individual HAPs and combined HAPs at levels that are below the Title V thresholds. Further, a PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records that contain the following information for the dip tank:
 - a. the name and identification number of each coating material employed;
 - b. the number of gallons of each coating material employed; and
 - c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating material employed.
2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K024, combined:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;
 - c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

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- h.** the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));
- i.** the number of gallons of each cleanup material employed;
- j.** the total individual HAP usage from all the coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);
- k.** the total combined HAP usage from all the coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);
- l.** the total VOC emissions from all the coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);
- m.** the rolling, 12-month total VOC emissions from all the coatings and cleanup materials employed, in pounds or tons per year;
- n.** the rolling, 12-month individual HAP usage from all the coatings and cleanup materials employed, in pounds or tons per year; and
- o.** the rolling, 12-month total combined HAP usage from all the coatings and cleanup materials employed, in pounds or tons per year.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

- 3.** The permittee shall record and maintain each month the following information for the uncontrolled emissions units (see section B.2):
 - a.** the total VOC material usage (including coatings and cleanup materials), in gallons;
 - b.** during the first 12 months of operation following the issuance of this permit, the monthly cumulative VOC materials usage rates; and

Emissions Unit ID: **K024**

- c. beginning the first month after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC materials usage (including coatings and cleanup materials), in gallons.
4. The permittee shall record and maintain each month the following information for the controlled emissions units (see section B.5):
 - a. the total VOC material usage (including coatings and cleanup materials), in gallons;
 - b. during the first 12 months of operation following the issuance of this permit, the monthly cumulative VOC materials usage rates; and
 - c. beginning the first month after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC materials usage (including coatings and cleanup materials), in gallons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. 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) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. for the uncontrolled emissions units identified in Section B.2:
 - i. during the first 12 months of operation following the issuance of this permit, all exceedances of the allowable monthly cumulative VOC materials (including coatings and cleanup materials) usage restrictions established in Section B.3; and
 - ii. beginning the first month after the first 12 months of operation following the issuance of this permit, all exceedances of the allowable VOC materials usage restriction of 49,414 gallons.
 - b. for the uncontrolled emissions units identified in Section B.5:

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- i. during the first 12 months of operation following the issuance of this permit, all exceedances of the allowable monthly cumulative VOC materials (including coatings and cleanup materials) usage restrictions established in Section B.6; and
 - ii. beginning the first month after the first 12 months of operation following the issuance of this permit, all exceedances of the allowable VOC materials usage restriction of 34,125 gallons..
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, and combined HAPs limitations of 92.72 tons, 9.0 tons, and 24.0 tons, respectively.
4. The permittee shall submit annual reports which specify the VOC material usage (including coating and cleanup), the total VOC emissions, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K024.

These reports shall be submitted by January 31st of each year and shall cover the previous calendar year.

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

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:
 - a. Emission Limitation:
The combined annual VOC emissions from the entire facility shall not exceed 92.72 tons as a rolling, 12-month summation.

Applicable Compliance Method:
The permittee shall demonstrate compliance with annual allowable VOC emissions limitation above based on the record keeping requirements established in Section C of this permit.
 - b. Emission Limitation:
The combined HAPs emissions from the entire facility shall not exceed 24.0 tons

Emissions Unit ID: **K024**

as a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual allowable HAPs emissions limitation above based on the record keeping requirements established in Section C of this permit.

c. Emission Limitation:

The annual individual HAP emissions from the entire facility shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual allowable individual HAP emissions limitation above based on the record keeping requirements established in Section C of this permit.

d. Emission Limitation:

The permittee shall not permit the use of any coating material that is in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable VOC content restriction above based on the record keeping requirements established in Section C of this permit.

e. Operational Restriction:

The maximum annual VOC material usage (including coatings and cleanup materials), based upon a rolling, 12-month summation, shall not exceed:

- i. for the uncontrolled emissions units, 49,414 gallons; and
- ii. for the controlled emissions units, 34,125 gallons.

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual allowable coating materials usage restrictions above based on the record keeping requirements established in Section C of this permit.

- 2.** The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60,

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Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, Permit to Install No. 16-02359, as issued on October 14, 2004, and Permit to Install No. 16-02406, as issued on October 20, 2005.

SIC CODE SCC CODE EMISSIONS UNIT ID

EMISSIONS UNIT DESCRIPTION

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		0.09 pound per hour			
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **no**

NESHAP? **no**

PSD? **no**

OFFSET POLICY? **no**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

