

Facility ID: 1576011632 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1576011632 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| metal foil surface coating line; application of water base coatings to a continuous strip of metal foil using a rotogravure roll and a doctor blade with two natural gas fired drying ovens | OAC rule 3745-31-05(A)(3) (PTI 15-520) | Volatile organic compound (VOC) emissions shall not exceed the following: 32.6 lbs/hr; 2.75 tons per month; and 33.0 tons per year. |
| | OAC rule 3745-21-09(E) | See section B.1 below. |
| | 40 CFR Part 60, Subpart TT | See section A.2.a below. See section A.2.b below. |

2. Additional Terms and Conditions

- (a) The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The permittee shall not emit more than 0.28 kilogram of VOC per liter of coating solids applied for each calendar month.

The requirements specified in 40 CFR Part 60, Subpart TT shall not apply during periods when the thickness of the metal coil being coated is less than 0.15 millimeter (0.006 inch).

B. Operational Restrictions

1. The permittee shall not utilize any coatings with a VOC content greater than 2.4 pounds per gallon, less water, as applied.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification of each coating employed;
 - b. the VOC content of each coating employed in pounds of VOC per gallon of coating, as applied;
 - c. the VOC content of each coating employed in pounds of VOC per gallon of coating less water, as applied;
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the VOC content of each cleanup material, in pounds per gallon;
 - g. the number of gallons of each cleanup material employed;
 - h. the total VOC emissions in pounds per day from all coatings and cleanup materials employed;
 - i. the total number of hours the emissions unit was operated; and
 - j. the average, hourly, VOC emission rate, i.e. (h/i), in pounds per hour.

2. The permittee shall collect and record the sum of the daily VOC emissions specified in section C.1.h above over the calendar month period and then divide by 2000 lbs/ton to determine the monthly VOC emissions, in tons.
3. The permittee shall collect and record the sum of the monthly VOC emissions calculated in section C.2 above over the calendar year period to determine the annual VOC emissions, in tons.
4. In addition to the monitoring and record keeping requirements specified in sections C.1, C.2 and C.3 above, for periods of time during which a metal coil with a thickness of 0.15 millimeter (0.006 inch) or greater is coated and pursuant to 40 CFR Part 60.464(a), the permittee shall compute and record the monthly volume-weighted average emissions of VOC's in kilogram per liter of coating solids applied during each calendar month according to the procedures and equations provided in 40 CFR Part 60.463(c)(1).

D. Reporting Requirements

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of any monthly record showing the use of noncomplying coatings (VOC content greater than 2.4 pounds per gallon less water). The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 30 days following the end of the calendar month in which the noncomplying coating was used.
2. 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.
3. Pursuant to 40 CFR Part 60.465(a), the permittee shall include in the initial compliance report required by 40 CFR Part 60.8 the weighted average of the VOC content of coatings used during a period of one calendar month.
4. Pursuant to 40 CFR Part 60.465(c), following the initial performance test, the permittee shall identify, record, and submit a written report to the Canton City Health Department, Air Pollution Control Division every calendar quarter (within 30 days of the end of the calendar quarter) of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than 0.28 kilogram of VOC per liter of applied solids.

If no such instances occurred during a particular quarter, a report stating that no instances occurred shall be submitted to the Canton City Health Department semiannually (within 30 days of the end of the second and fourth calendar quarters).

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 and the operational restriction in section B.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

32.6 lbs/hr of VOC

Applicable Compliance Method:

Compliance may be demonstrated based upon the recording keeping requirements specified in section C.1.

Compliance shall be demonstrated based upon the methods and procedures specified in section E.2.

Emission Limitation

2.75 tons of VOC per month

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recording keeping requirements specified in sections C.1 and C.2.

Emission Limitation:

33.0 tons per year of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recording keeping requirements specified in sections C.1, C.2 and C.3.

Emission Limitation:

The permittee shall not emit more than 0.28 kilogram of VOC per liter of coating solids applied for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recording keeping requirements specified in section C.4.

Operational Restriction:

The permittee shall not utilize any coatings with a VOC content of greater than 2.4 pounds per gallon less water, as applied.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recording keeping requirements specified in section C.1.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 90 days of issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate

for VOC of 32.6 lbs/hr.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: for VOC, Methods 1 through 4 and Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

F. **Miscellaneous Requirements**

1. None