

Facility ID: 1677000223 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.

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit K004](#)
- [Go to Part II for Emissions Unit K005](#)
- [Go to Part II for Emissions Unit K006](#)
- [Go to Part II for Emissions Unit K007](#)
- [Go to Part II for Emissions Unit K008](#)
- [Go to Part II for Emissions Unit K009](#)
- [Go to Part II for Emissions Unit K010](#)
- [Go to Part II for Emissions Unit K011](#)
- [Go to Part II for Emissions Unit K012](#)
- [Go to Part II for Emissions Unit K013](#)
- [Go to Part II for Emissions Unit K014](#)

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

Facility ID: 1677000223 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Blanked end liner 1 - two and three piece can end surface coating line	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	3.5 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(D)	3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.

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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (tons)	Maximum Allowable Cumulative Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions of Combined HAP (tons)
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0

1-7 71.25 6.75 18.0
 1-8 71.25 6.75 18.0
 1-9 71.25 6.75 18.0
 1-10 95.00 9.00 24.0
 1-11 95.00 9.00 24.0
 1-12 95.00 9.00 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon and in pounds of VOC per gallon excluding water and exempt solvents;
 - d. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
 These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., concerning 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) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

3.5 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

Acceptable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed in this emissions unit. 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 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, 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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784
 MAGLC (ug/m3): 4,190
 Pollutant: hexane isomers

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 1.89
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560
 MAGLC (ug/m3): 41,905
 Pollutant: ethanol

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 1.43
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172
 MAGLC (ug/m3): 44,762
 Pollutant: isopropanol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 2.65
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 MAGLC (ug/m3): 23,405
 Pollutant: heptane

TLV (mg/m3): 1,640
 Maximum Hourly Emission Rate (lbs/hr): 14.73
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 MAGLC (ug/m3): 39,048
 Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 3.35
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 MAGLC (ug/m3): 14,048
 Pollutant: ethylbenzene

TLV (mg/m3): 176
 Maximum Hourly Emission Rate (lbs/hr): 0.04
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 MAGLC (ug/m3): 10,333
 Pollutant: xylene

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 MAGLC (ug/m3): 10,333
 Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 0.013
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:

a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Conversion press 1 - tab press, score line press	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	2.0 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(U)	3.0 gallons per day of tab lubricant

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

	<u>Maximum Allowable Emissions</u>	<u>Maximum Allowable Cumulative Emissions</u>	<u>Maximum Allowable Cumulative Emissions</u>
<u>Month(s) of VOC (tons)</u>	<u>Individual HAP (tons)</u>	<u>Individual HAP (tons)</u>	<u>Combined HAP (tons)</u>
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0
1-7	71.25	6.75	18.0
1-8	71.25	6.75	18.0
1-9	71.25	6.75	18.0

1-10 95.00 9.00 24.0

1-11 95.00 9.00 24.0

1-12 95.00 9.00 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total number of gallons of all coatings and cleanup materials employed;
 - d. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;
 - e. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.
- E. Testing Requirements**
1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation:
- 95 TPY of VOC for entire facility
- Applicable Compliance Method:
- Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.
- Emission Limitation:
- 24 TPY of all HAPs for entire facility
- Applicable Compliance Method:
- Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.
- Emission Limitation:
- 9.0 TPY of any individual HAP for entire facility
- Applicable Compliance Method:
- Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.
- Emission Limitation:
- 2.0 lbs/hour of VOC
- Applicable Compliance Method:
- Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.
- Emission Limitation:
- 3.0 gallons per day of tab lubricant
- Acceptable Compliance Method:
- Daily records shall be maintained of the volume, in gallons, of each coating employed.
- F. Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:
 - Pollutant: n-hexane
 - TLV (mg/m3): 176
 - Maximum Hourly Emission Rate (lbs/hr): 0.95
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784
 - MAGLC (ug/m3): 4,190
 - Pollutant: hexane isomers
 - TLV (mg/m3): 1,760
 - Maximum Hourly Emission Rate (lbs/hr): 1.89
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560
 - MAGLC (ug/m3): 41,905
 - Pollutant: ethanol
 - TLV (mg/m3): 1,880
 - Maximum Hourly Emission Rate (lbs/hr): 1.43
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172
 - MAGLC (ug/m3): 44,762
 - Pollutant: isopropanol
 - TLV (mg/m3): 983
 - Maximum Hourly Emission Rate (lbs/hr): 2.65
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 - MAGLC (ug/m3): 23,405
 - Pollutant: heptane
 - TLV (mg/m3): 1,640
 - Maximum Hourly Emission Rate (lbs/hr): 14.73
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 - MAGLC (ug/m3): 39,048
 - Pollutant: methyl ethyl ketone
 - TLV (mg/m3): 590
 - Maximum Hourly Emission Rate (lbs/hr): 3.35
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 - MAGLC (ug/m3): 14,048
 - Pollutant: ethylbenzene
 - TLV (mg/m3): 176
 - Maximum Hourly Emission Rate (lbs/hr): 0.04
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 - MAGLC (ug/m3): 10,333
 - Pollutant: xylene
 - TLV (mg/m3): 1,760
 - Maximum Hourly Emission Rate (lbs/hr): 0.20
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 - MAGLC (ug/m3): 10,333
 - Pollutant: propylene glycol monomethyl ether
 - TLV (mg/m3): 1,880
 - Maximum Hourly Emission Rate (lbs/hr): 0.013
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 - MAGLC (ug/m3): 8,786
2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01 (V).

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

Facility ID: 1677000223 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Conversion press 2 - tab press, score line press	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	2.0 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(U)	3.0 gallons per day of tab lubricant

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:
 - 95.0 tons of volatile organic compounds (VOC);
 - 24.0 tons of all hazardous air pollutants (HAP); and
 - 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC (tons)	Individual HAP (tons)	Combined HAP (tons)
1	23.75	2.25 6.0
1-2	23.75	2.25 6.0
1-3	23.75	2.25 6.0
1-4	47.50	4.50 12.0
1-5	47.50	4.50 12.0
1-6	47.50	4.50 12.0
1-7	71.25	6.75 18.0
1-8	71.25	6.75 18.0
1-9	71.25	6.75 18.0
1-10	95.00	9.00 24.0
1-11	95.00	9.00 24.0
1-12	95.00	9.00 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012,

K013, and K014:

- a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total number of gallons of all coatings and cleanup materials employed;
 - d. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;
 - e. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

2.0 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.0 gallons per day of tab lubricant

Acceptable Compliance Method:

Daily records shall be maintained of the volume, in gallons, of each coating employed.

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:
Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784
 MAGLC (ug/m3): 4,190
 Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560
 MAGLC (ug/m3): 41,905
 Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172
 MAGLC (ug/m3): 44,762
 Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.65
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 MAGLC (ug/m3): 23,405
 Pollutant: heptane

TLV (mg/m3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 14.73
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 MAGLC (ug/m3): 39,048
 Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.35
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 MAGLC (ug/m3): 14,048
 Pollutant: ethylbenzene

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.04
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 MAGLC (ug/m3): 10,333
 Pollutant: xylene

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 MAGLC (ug/m3): 10,333
 Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 0.013
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
- any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Blacked end liner 2 - two and three piece can end surface coating line	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	3.5 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(D)	3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.

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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC (tons)	Maximum Allowable Individual HAP (tons)	Maximum Allowable Cumulative Emissions of Individual HAP (tons)	Maximum Allowable Combined HAP (tons)
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0
1-7	71.25	6.75	18.0
1-8	71.25	6.75	18.0
1-9	71.25	6.75	18.0
1-10	95.00	9.00	24.0
1-11	95.00	9.00	24.0
1-12	95.00	9.00	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon and in pounds of VOC per gallon excluding water and exempt solvents;
 - d. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
- 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.
- 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
- 5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., concerning 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) within 30 days following the end of the calendar month.

E. Testing Requirements

- 1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

3.5 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

Acceptable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed in this emissions unit. 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 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, 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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 1.89
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560
 MAGLC (ug/m3): 41,905
 Pollutant: ethanol

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 1.43
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172
 MAGLC (ug/m3): 44,762
 Pollutant: isopropanol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 2.65
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 MAGLC (ug/m3): 23,405
 Pollutant: heptane

TLV (mg/m3): 1,640
 Maximum Hourly Emission Rate (lbs/hr): 14.73
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 MAGLC (ug/m3): 39,048
 Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 3.35
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 MAGLC (ug/m3): 14,048
 Pollutant: ethylbenzene

TLV (mg/m3): 176
 Maximum Hourly Emission Rate (lbs/hr): 0.04
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 MAGLC (ug/m3): 10,333
 Pollutant: xylene

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 MAGLC (ug/m3): 10,333
 Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 0.013
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
- any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Conversion press 3 - tab press, score line press	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	2.0 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(U)	3.0 gallons per day of tab lubricant

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC (tons) of Individual HAP (tons) Combined HAP (tons)	Maximum Allowable	Maximum Allowable	Maximum Allowable
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0
1-7	71.25	6.75	18.0
1-8	71.25	6.75	18.0
1-9	71.25	6.75	18.0
1-10	95.00	9.00	24.0
1-11	95.00	9.00	24.0
1-12	95.00	9.00	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;

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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:

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

b. the number of gallons of each coating and cleanup material employed;

c. the total number of gallons of all coatings and cleanup materials employed;

d. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;

e. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.

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

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

2.0 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.0 gallons per day of tab lubricant

Acceptable Compliance Method:

Daily records shall be maintained of the volume, in gallons, of each coating employed.

F. Miscellaneous Requirements

- This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

MAGLC (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172

MAGLC (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 2.65
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 MAGLC (ug/m3): 23,405
 Pollutant: heptane

TLV (mg/m3): 1,640
 Maximum Hourly Emission Rate (lbs/hr): 14.73
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 MAGLC (ug/m3): 39,048
 Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 3.35
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 MAGLC (ug/m3): 14,048
 Pollutant: ethylbenzene

TLV (mg/m3): 176
 Maximum Hourly Emission Rate (lbs/hr): 0.04
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 MAGLC (ug/m3): 10,333
 Pollutant: xylene

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 MAGLC (ug/m3): 10,333
 Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 0.013
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
- any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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).

- 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.
 - None.
- 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.
 - 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>
Blanked end liner 3 - two and three piece can end surface coating line	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	3.5 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(D)	3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC (tons)	Maximum Allowable Cumulative Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions Combined HAP (tons)
1	23.75	2.25 6.0
1-2	23.75	2.25 6.0
1-3	23.75	2.25 6.0
1-4	47.50	4.50 12.0
1-5	47.50	4.50 12.0
1-6	47.50	4.50 12.0
1-7	71.25	6.75 18.0
1-8	71.25	6.75 18.0
1-9	71.25	6.75 18.0
1-10	95.00	9.00 24.0
1-11	95.00	9.00 24.0
1-12	95.00	9.00 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:

- a. the name and identification number of each coating, as applied;
- b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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(s) content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
- o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:
- the name and identification number of each coating and cleanup material employed;
 - the number of gallons of each coating and cleanup material employed;
 - the total VOC content of each coating and cleanup material, in pounds of VOC per gallon and in pounds of VOC per gallon excluding water and exempt solvents;
 - the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - the total number of hours the emissions unit was in operation; and
 - the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).
- D. Reporting Requirements**
- The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 - The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 - The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.
 - The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
 - The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., concerning 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) within 30 days following the end of the calendar month.
- E. Testing Requirements**
- Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
95 TPY of VOC for entire facility
Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.
Emission Limitation:
24 TPY of all HAPs for entire facility
Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

3.5 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

Acceptable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed in this emissions unit. 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 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, 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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

MAGLC (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172

MAGLC (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810

MAGLC (ug/m3): 23,405
Pollutant: heptane

TLV (mg/m3): 1,640
Maximum Hourly Emission Rate (lbs/hr): 14.73
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
MAGLC (ug/m3): 39,048
Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 3.35
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
MAGLC (ug/m3): 14,048
Pollutant: ethylbenzene

TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.04
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
MAGLC (ug/m3): 10,333
Pollutant: xylene

TLV (mg/m3): 1,760
Maximum Hourly Emission Rate (lbs/hr): 0.20
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
MAGLC (ug/m3): 10,333
Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880
Maximum Hourly Emission Rate (lbs/hr): 0.013
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
- any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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).

- 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.
 - None.
- 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.
 - None.

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
Conversion press 4 - tab press, score line press	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	2.0 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(U)	3.0 gallons per day of tab lubricant

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable VOC (tons)	Maximum Allowable Individual HAP (tons)	Maximum Allowable Combined HAP (tons)
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0
1-7	71.25	6.75	18.0
1-8	71.25	6.75	18.0
1-9	71.25	6.75	18.0
1-10	95.00	9.00	24.0
1-11	95.00	9.00	24.0
1-12	95.00	9.00	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
- 2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total number of gallons of all coatings and cleanup materials employed;
 - d. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;
 - e. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).
- D. **Reporting Requirements**
 - 1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 - 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 - 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.
 - 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
 - 5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.
- E. **Testing Requirements**
 - 1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.
Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.
Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

2.0 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.0 gallons per day of tab lubricant

Acceptable Compliance Method:

Daily records shall be maintained of the volume, in gallons, of each coating employed.

F. Miscellaneous Requirements

- This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

MAGLC (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172

MAGLC (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810

MAGLC (ug/m3): 23,405

Pollutant: heptane

TLV (mg/m3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 14.73

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162

MAGLC (ug/m3): 39,048

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.35

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762

MAGLC (ug/m3): 14,048
Pollutant: ethylbenzene

TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.04
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
MAGLC (ug/m3): 10,333
Pollutant: xylene

TLV (mg/m3): 1,760
Maximum Hourly Emission Rate (lbs/hr): 0.20
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
MAGLC (ug/m3): 10,333
Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880
Maximum Hourly Emission Rate (lbs/hr): 0.013
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K008 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Blanked end liner 4 - two and three piece can end surface coating line	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	3.5 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(D)	3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

2. **Additional Terms and Conditions**

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.

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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC (tons)	Maximum Allowable Cumulative Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions Combined HAP (tons)
1	23.75	2.25
1-2	23.75	2.25
1-3	23.75	2.25
1-4	47.50	4.50
1-5	47.50	4.50
1-6	47.50	4.50
1-7	71.25	6.75
1-8	71.25	6.75
1-9	71.25	6.75
1-10	95.00	9.00
1-11	95.00	9.00
1-12	95.00	9.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:

- a. the name and identification number of each coating, as applied;
- b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
- 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
- o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

- 2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

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

- b. the number of gallons of each coating and cleanup material employed;
- c. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon and in pounds of VOC per gallon excluding water and exempt solvents;
- d. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., concerning 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) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.
Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.
Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

3.5 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

Acceptable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed in this emissions unit. 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 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, 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**

- This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

MAGLC (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172

MAGLC (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810

MAGLC (ug/m3): 23,405

Pollutant: heptane

TLV (mg/m3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 14.73

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162

MAGLC (ug/m3): 39,048

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.35

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762

MAGLC (ug/m3): 14,048

Pollutant: ethylbenzene

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 MAGLC (ug/m3): 10,333
 Pollutant: xylene

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 MAGLC (ug/m3): 10,333
 Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 0.013
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K009 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Conversion press 5 - tab press, score line press	OAC rule 3745-31-02(A)(2) (PTI 16-1733)	2.0 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(U)	3.0 gallons per day of tab lubricant

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC (tons) of Individual HAP (tons) Combined HAP (tons)	Maximum Allowable	Maximum Allowable	Maximum Allowable
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0
1-7	71.25	6.75	18.0
1-8	71.25	6.75	18.0
1-9	71.25	6.75	18.0
1-10	95.00	9.00	24.0
1-11	95.00	9.00	24.0
1-12	95.00	9.00	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:

- a. the name and identification number of each coating, as applied;
- b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
- 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
- o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:

- a. the name and identification number of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the total number of gallons of all coatings and cleanup materials employed;

- d. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;
- e. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

2.0 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.0 gallons per day of tab lubricant

Acceptable Compliance Method:

Daily records shall be maintained of the volume, in gallons, of each coating employed.

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

MAGLC (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172

MAGLC (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810

MAGLC (ug/m3): 23,405

Pollutant: heptane

TLV (mg/m3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 14.73

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162

MAGLC (ug/m3): 39,048

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.35

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762

MAGLC (ug/m3): 14,048

Pollutant: ethylbenzene

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32

MAGLC (ug/m3): 10,333

Pollutant: xylene

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 0.20

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164

MAGLC (ug/m3): 10,333

Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 0.013

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K010 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Blanked end liner 5 - two and three piece can end surface coating line	OAC rule 3745-31-05 (PTI 16-1733)	3.5 lbs/hr of volatile organic compounds (VOC) See A.2 below.
	OAC rule 3745-21-09(D)	3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:
 - 95.0 tons of volatile organic compounds (VOC);
 - 24.0 tons of all hazardous air pollutants (HAP); and
 - 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximum Allowable	Maximum Allowable	Maximum Allowable
Cumulative Emissions	Cumulative Emissions	Cumulative Emissions

Month(s) of VOC (tons) of Individual HAP (tons) Combined HAP (tons)

1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0
1-7	71.25	6.75	18.0
1-8	71.25	6.75	18.0
1-9	71.25	6.75	18.0
1-10	95.00	9.00	24.0
1-11	95.00	9.00	24.0
1-12	95.00	9.00	24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
- 2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon and in pounds of VOC per gallon excluding water and exempt solvents;
 - d. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.

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

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., concerning 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) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

3.5 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

Acceptable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed in this emissions unit. 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 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, 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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

MAGLC (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172

MAGLC (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810

MAGLC (ug/m3): 23,405

Pollutant: heptane

TLV (mg/m3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 14.73

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162

MAGLC (ug/m3): 39,048

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.35

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762

MAGLC (ug/m3): 14,048

Pollutant: ethylbenzene

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32

MAGLC (ug/m3): 10,333

Pollutant: xylene

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 0.20

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164

MAGLC (ug/m3): 10,333

Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 0.013

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9

MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification

to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K011 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Conversion press 6 - tab press, score line press	OAC rule 3745-31-05 (PTI 16-1733)	2.0 lbs/hr of volatile organic compounds (VOC) See A.2 below. 3.0 gallons per day of tab lubricant
	OAC rule 3745-21-09(U)	

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:
 - 95.0 tons of volatile organic compounds (VOC);
 - 24.0 tons of all hazardous air pollutants (HAP); and
 - 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

	Maximum Allowable	Maximum Allowable	Maximum Allowable
	Cumulative Emissions	Cumulative Emissions	Cumulative Emissions
Month(s) of	VOC (tons)	Individual HAP (tons)	Combined HAP (tons)
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0

1-3 23.75 2.25 6.0
 1-4 47.50 4.50 12.0
 1-5 47.50 4.50 12.0
 1-6 47.50 4.50 12.0
 1-7 71.25 6.75 18.0
 1-8 71.25 6.75 18.0
 1-9 71.25 6.75 18.0
 1-10 95.00 9.00 24.0
 1-11 95.00 9.00 24.0
 1-12 95.00 9.00 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
- the name and identification number of each coating, as applied;
 - the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, as applied;
 - the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - 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));
 - the number of gallons of each coating employed;
 - the name and identification of each cleanup material employed;
 - the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - 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));
 - the number of gallons of each cleanup material employed;
 - the total individual HAP emissions from all 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);
 - the total combined HAP emissions from all 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);
 - the total VOC emissions from all 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);
 - the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:
- the name and identification number of each coating and cleanup material employed;
 - the number of gallons of each coating and cleanup material employed;
 - the total number of gallons of all coatings and cleanup materials employed;
 - the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;
 - the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - the total number of hours the emissions unit was in operation; and
 - the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
- These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

2.0 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.0 gallons per day of tab lubricant

Acceptable Compliance Method:

Daily records shall be maintained of the volume, in gallons, of each coating employed.

F. **Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:
 - Pollutant: n-hexane
 - TLV (mg/m3): 176
 - Maximum Hourly Emission Rate (lbs/hr): 0.95
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784
 - MAGLC (ug/m3): 4,190
 - Pollutant: hexane isomers
 - TLV (mg/m3): 1,760
 - Maximum Hourly Emission Rate (lbs/hr): 1.89
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560
 - MAGLC (ug/m3): 41,905
 - Pollutant: ethanol
 - TLV (mg/m3): 1,880
 - Maximum Hourly Emission Rate (lbs/hr): 1.43
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172
 - MAGLC (ug/m3): 44,762
 - Pollutant: isopropanol
 - TLV (mg/m3): 983
 - Maximum Hourly Emission Rate (lbs/hr): 2.65
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 - MAGLC (ug/m3): 23,405
 - Pollutant: heptane
 - TLV (mg/m3): 1,640
 - Maximum Hourly Emission Rate (lbs/hr): 14.73
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 - MAGLC (ug/m3): 39,048
 - Pollutant: methyl ethyl ketone
 - TLV (mg/m3): 590
 - Maximum Hourly Emission Rate (lbs/hr): 3.35
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 - MAGLC (ug/m3): 14,048
 - Pollutant: ethylbenzene
 - TLV (mg/m3): 176
 - Maximum Hourly Emission Rate (lbs/hr): 0.04
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 - MAGLC (ug/m3): 10,333
 - Pollutant: xylene
 - TLV (mg/m3): 1,760
 - Maximum Hourly Emission Rate (lbs/hr): 0.20
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 - MAGLC (ug/m3): 10,333
 - Pollutant: propylene glycol monomethyl ether
 - TLV (mg/m3): 1,880
 - Maximum Hourly Emission Rate (lbs/hr): 0.013
 - Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 - MAGLC (ug/m3): 8,786
 - 2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K012 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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> |
|--|--------------------------------------|--|
| Blanked end liner 6 - two and three piece can end surface coating line | OAC rule 3745-31-05 (PTI 16-1733) | 3.5 lbs/hr of volatile organic compounds (VOC)
See A.2 below. |
| | OAC rule 3745-21-09(D) | 3.7 pounds of VOC per gallon of coating, minus water and exempt solvents |

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| | Maximum Allowable | Maximum Allowable | Maximum Allowable |
|---|----------------------|----------------------|----------------------|
| Month(s) of VOC (tons) of Individual HAP (tons) | Cumulative Emissions | Cumulative Emissions | Cumulative Emissions |
| | Combined HAP (tons) | | |
| 1 | 23.75 | 2.25 | 6.0 |
| 1-2 | 23.75 | 2.25 | 6.0 |
| 1-3 | 23.75 | 2.25 | 6.0 |
| 1-4 | 47.50 | 4.50 | 12.0 |
| 1-5 | 47.50 | 4.50 | 12.0 |
| 1-6 | 47.50 | 4.50 | 12.0 |
| 1-7 | 71.25 | 6.75 | 18.0 |
| 1-8 | 71.25 | 6.75 | 18.0 |
| 1-9 | 71.25 | 6.75 | 18.0 |
| 1-10 | 95.00 | 9.00 | 24.0 |
| 1-11 | 95.00 | 9.00 | 24.0 |
| 1-12 | 95.00 | 9.00 | 24.0 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the

facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon and in pounds of VOC per gallon excluding water and exempt solvents;
 - d. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., concerning 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) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

3.5 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.7 pounds of VOC per gallon of coating, minus water and exempt solvents

Acceptable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed in this emissions unit. 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 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, 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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

MAGLC (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172

MAGLC (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.65

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810

MAGLC (ug/m3): 23,405

Pollutant: heptane

TLV (mg/m3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 14.73

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162

MAGLC (ug/m3): 39,048

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.35

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762

MAGLC (ug/m3): 14,048

Pollutant: ethylbenzene

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32

MAGLC (ug/m3): 10,333

Pollutant: xylene

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 0.20

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164

MAGLC (ug/m3): 10,333

Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 0.013

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9

MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K013 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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> |
|--|--------------------------------------|--|
| Conversion press 7 - tab press, score line press | OAC rule 3745-31-05 (PTI 16-1733) | 2.0 lbs/hr of volatile organic compounds (VOC)
See A.2 below. |
| | OAC rule 3745-21-09(U) | 3.0 gallons per day of tab lubricant |

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| | Maximum Allowable | Maximum Allowable | Maximum Allowable |
|------------------------|-----------------------|---------------------|-------------------|
| Month(s) of VOC (tons) | Individual HAP (tons) | Combined HAP (tons) | |
| 1 | 23.75 | 2.25 | 6.0 |
| 1-2 | 23.75 | 2.25 | 6.0 |
| 1-3 | 23.75 | 2.25 | 6.0 |
| 1-4 | 47.50 | 4.50 | 12.0 |
| 1-5 | 47.50 | 4.50 | 12.0 |
| 1-6 | 47.50 | 4.50 | 12.0 |
| 1-7 | 71.25 | 6.75 | 18.0 |
| 1-8 | 71.25 | 6.75 | 18.0 |
| 1-9 | 71.25 | 6.75 | 18.0 |
| 1-10 | 95.00 | 9.00 | 24.0 |
| 1-11 | 95.00 | 9.00 | 24.0 |
| 1-12 | 95.00 | 9.00 | 24.0 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None
- C. **Monitoring and/or Record Keeping Requirements**
 1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
 2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total number of gallons of all coatings and cleanup materials employed;
 - d. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;
 - e. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).
- D. **Reporting Requirements**
 1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.
 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
 5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.
- E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

95 TPY of VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

2.0 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.0 gallons per day of tab lubricant

Acceptable Compliance Method:

Daily records shall be maintained of the volume, in gallons, of each coating employed.

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-

level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784
 MAGLC (ug/m3): 4,190
 Pollutant: hexane isomers

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 1.89
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560
 MAGLC (ug/m3): 41,905
 Pollutant: ethanol

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 1.43
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172
 MAGLC (ug/m3): 44,762
 Pollutant: isopropanol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 2.65
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 MAGLC (ug/m3): 23,405
 Pollutant: heptane

TLV (mg/m3): 1,640
 Maximum Hourly Emission Rate (lbs/hr): 14.73
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 MAGLC (ug/m3): 39,048
 Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 3.35
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 MAGLC (ug/m3): 14,048
 Pollutant: ethylbenzene

TLV (mg/m3): 176
 Maximum Hourly Emission Rate (lbs/hr): 0.04
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 MAGLC (ug/m3): 10,333
 Pollutant: xylene

TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 MAGLC (ug/m3): 10,333
 Pollutant: propylene glycol monomethyl ether

TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 0.013
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
- any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

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

Facility ID: 1677000223 Emissions Unit ID: K014 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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> |
|--|--------------------------------------|---|
| Post end repair station - flash-off oven, can end surface coating line | OAC rule 3745-31-05 (PTI 16-1733) | 3.75 lbs/hr of volatile organic compounds (VOC)
See A.2 below. |
| | OAC rule 3745-21-09(U) | 3.0 gallons per day of coatings |

2. Additional Terms and Conditions

- (a) The combined annual emissions from the entire facility (K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014) shall not exceed the following as rolling, 12-month summations:

95.0 tons of volatile organic compounds (VOC);
 24.0 tons of all hazardous air pollutants (HAP); and
 9.0 tons of any individual HAP.
 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 be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| Month(s) | Cumulative Emissions of VOC (tons) | Maximum Allowable Cumulative Emissions of Individual HAP (tons) | Maximum Allowable Cumulative Emissions of Combined HAP (tons) |
|----------|------------------------------------|---|---|
| 1 | 23.75 | 2.25 | 6.0 |
| 1-2 | 23.75 | 2.25 | 6.0 |
| 1-3 | 23.75 | 2.25 | 6.0 |
| 1-4 | 47.50 | 4.50 | 12.0 |
| 1-5 | 47.50 | 4.50 | 12.0 |
| 1-6 | 47.50 | 4.50 | 12.0 |
| 1-7 | 71.25 | 6.75 | 18.0 |
| 1-8 | 71.25 | 6.75 | 18.0 |
| 1-9 | 71.25 | 6.75 | 18.0 |
| 1-10 | 95.00 | 9.00 | 24.0 |
| 1-11 | 95.00 | 9.00 | 24.0 |
| 1-12 | 95.00 | 9.00 | 24.0 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014:
 - a. the name and identification number of each coating, as applied;
 - b. the total VOC content of each coating and cleanup material, in pounds of VOC per gallon, 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;
 - 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 emissions from all 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 emissions from all 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 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 summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);
 - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for each HAP for the previous 12 calendar months); and
 - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).
2. The permittee shall maintain daily records, on a monthly basis, that contain the following information for this emissions unit:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total number of gallons of all coatings and cleanup materials employed;
 - d. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material employed;
 - e. the total daily VOC emissions for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).
- D. Reporting Requirements**
- 1. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.
These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 - 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 - 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC for this emissions unit, and the actual VOC emissions for each such period.
 - 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
 - 5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation. 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.
- E. Testing Requirements**
- 1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
95 TPY of VOC for entire facility
Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. 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, 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.

Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. 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 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, 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.

Emission Limitation:

3.75 lbs/hour of VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. 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 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, 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.

Emission Limitation:

3.0 gallons per day of coatings

Acceptable Compliance Method:

Daily records shall be maintained of the volume, in gallons, of each coating employed.

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI 16-1733. In conjunction with the best available technology requirements of OAC 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

MAGLC (ug/m3): 4,190

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

- Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560
 MAGLC (ug/m3): 41,905
 Pollutant: ethanol
- TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 1.43
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,172
 MAGLC (ug/m3): 44,762
 Pollutant: isopropanol
- TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 2.65
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,810
 MAGLC (ug/m3): 23,405
 Pollutant: heptane
- TLV (mg/m3): 1,640
 Maximum Hourly Emission Rate (lbs/hr): 14.73
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 12,162
 MAGLC (ug/m3): 39,048
 Pollutant: methyl ethyl ketone
- TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 3.35
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,762
 MAGLC (ug/m3): 14,048
 Pollutant: ethylbenzene
- TLV (mg/m3): 176
 Maximum Hourly Emission Rate (lbs/hr): 0.04
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 32
 MAGLC (ug/m3): 10,333
 Pollutant: xylene
- TLV (mg/m3): 1,760
 Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 164
 MAGLC (ug/m3): 10,333
 Pollutant: propylene glycol monomethyl ether
- TLV (mg/m3): 1,880
 Maximum Hourly Emission Rate (lbs/hr): 0.013
 Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9
 MAGLC (ug/m3): 8,786
2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1733 and the operating permit:
- any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).