

Facility ID: 1677010028 Issuance type: Draft 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 P001](#)
- [Go to Part II for Emissions Unit T001](#)
- [Go to Part II for Emissions Unit T002](#)
- [Go to Part II for Emissions Unit T003](#)
- [Go to Part II for Emissions Unit T004](#)
- [Go to Part II for Emissions Unit T005](#)
- [Go to Part II for Emissions Unit T006](#)
- [Go to Part II for Emissions Unit T007](#)
- [Go to Part II for Emissions Unit T008](#)
- [Go to Part II for Emissions Unit T009](#)
- [Go to Part II for Emissions Unit T010](#)
- [Go to Part II for Emissions Unit T011](#)

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

Facility ID: 1677010028 Emissions Unit ID: P001 Issuance type: Draft 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>
1/2 hp air mixer (A4)	OAC rule 3745-21-07(G)(2)	8 lbs/hr organic compounds (OC) 40 lbs/day OC
	OAC rule 3745-35-07	See A.2.a below. Combined annual emissions from all facility emissions units identified in section C.1 shall not exceed the following as rolling, 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAPs); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) The applicable emission limitations based on this rule are less stringent than the limits established pursuant to OAC rule 3745-35-07 at maximum production rates. However, these limitations are still applicable as short-term limits.
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 for the total combined emissions from all facility emissions units:

Month(s)	VOC Limit	Total HAPs Limit	Individual HAP Limit
1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons

1-11 99.0 tons 24.75 tons 9.9 tons

1-12 99.0 tons 24.90 tons 9.9 tons

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 rolling, 12-month summations of the monthly emissions, in tons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
2. The permittee shall collect and record the following on a daily basis for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) for each batch produced at the facility;
 - b. the hours of operation for each batch;
 - c. the total number of mixers, mills, and churns operated each day;
 - d. the volume of each batch, in gallons;
 - e. the OC content of each batch, in pounds per gallon;
 - f. the mass of evaporative loss of OC from each batch, in pounds, i.e., $(C.2.d) \times (C.2.e) \times (0.015)^*$;
 - g. the calculated daily OC emissions from all batch operations, in pounds, i.e., the sum of the values recorded in C.2.f for each batch identified in C.2.a;
 - h. the total hours of operation for all batches;
 - i. the calculated average hourly OC emission rate for all batches, i.e., $(C.2.g)/(C.2.h)$, in pounds per hour;
 - j. the calculated average hourly OC emission rate for each unit, i.e., $(C.2.i)/(\text{the total number of units identified in C.3.c})$, in pounds per hour per unit (to demonstrate that each mill, churn, and mixer is compliant, on average, with the hourly limit established in section A.1); and
 - k. the calculated daily OC emission rate for each unit, i.e., $(C.2.g)/(\text{the total number of units identified in C.3.c})$, in pounds per day per unit (to demonstrate that each mill, churn, and mixer is compliant, on average, with the daily limit established in section A.1).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.
3. The permittee shall collect and record the following information each month for the mixers, mills, and churns:
 - a. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - b. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.2.d) \times (C.3.a) \times (0.015)^*$ for each HAP, for all batches identified in C.2.a during the month);
 - c. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.b, for all batches identified in C.2.a during the month); and
 - d. the total VOC emissions from all batches, in pounds (i.e., the sum of the daily emission values recorded in C.2.g for all batches).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.
4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.
6. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the hourly OC emissions limitation (8 lbs/hr); and/or
 - b. the daily OC emissions limitation (40 lbs/day).

Each deviation (excursion) report shall include a copy of the record(s) documenting the exceedance(s) and shall include a description of the corrective actions taken to prevent future exceedances.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
5. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
6. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
8.0 lbs/hr OC
40.0 lbs/hr OC

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. Formulation data or USEPA Method 24 shall be used to determine the OC content of the batch ingredients.
Emission Limitation:
99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.6 and D.2 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:
 - i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
 - ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.
 - iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.6 and D.3 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

- i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.
- iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.6 and D.4 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

- i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.
- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. **Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T001 Issuance type: Draft 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>
---	--------------------------------------	--

16,640-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units identified in section C.1 shall not exceed the following as rolling, 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAPs); and 9.9 tons of any individual HAP.
---------------------------------------	---	---

2. Additional Terms and Conditions

- (a) 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 for the total combined emissions from all facility emission units:

Month(s) VOC Limit Total HAPs Limit Individual HAP Limit

1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

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 rolling, 12-month summations of the monthly emissions, in tons.

In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
- 2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.
- 3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., (C.3.b)x(C.3.c)x(0.015)*);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of (C.3.b)x(C.3.f)x(0.015)* for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton

product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
99.0 tpy VOC for entire facility
Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:
 - i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
 - ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.
 - iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.
 Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.
Emission Limitation:
24.9 tpy combined HAPs for entire facility
Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:
 - i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.

iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T002 Issuance type: Draft 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>
Tank #2 12,496-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

(a) 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 for the total combined annual emissions from all facility emission units:

Month(s) VOC Limit Total HAPs Limit Individual HAP Limit

1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

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

In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.

- 2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

- 3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., (C.3.b)x(C.3.c)x(0.015)*);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of (C.3.b)x(C.3.f)x(0.015)* for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

- 4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e. (C.4.a)x(C.4.b)x(0.005)*;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., (C.4.a)x(C.4.d)x(0.005)*

for each HAP; and

f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.

5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

- i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
 - ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.
 - iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.
- Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T003 Issuance type: Draft 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>
Tank #3 3,900-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s)	VOC Limit	Total HAPs Limit	Individual HAP Limit
1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons

1-10 90.0 tons 22.50 tons 9.0 tons
 1-11 99.0 tons 24.75 tons 9.9 tons
 1-12 99.0 tons 24.90 tons 9.9 tons

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

In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.

2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:

- a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
- b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
- c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:

- a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
- b. the volume of each batch, in gallons;
- c. the VOC content of each batch, in pounds per gallon;
- d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., $(C.3.b) \times (C.3.c) \times (0.015)^*$);
- e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
- f. the individual HAP content of each batch, in pounds of each HAP per gallon;
- g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.3.b) \times (C.3.f) \times (0.015)^*$ for each HAP, for all batches identified in C.3.a during the month); and
- h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

4. The permittee shall collect and record the following information each month for all can washing operations:

- a. the total volume of mill wash employed in all can washing operations, in gallons;
- b. the VOC content of the mill wash, in pounds per gallon;
- c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
- d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
- e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
- f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.

- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T004 Issuance type: Draft 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>
Tank #4 7,775-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s)	VOC Limit	Total HAPs Limit	Individual HAP Limit
1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emission limitations, in tons.
In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
 2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.
 3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., $(C.3.b) \times (C.3.c) \times (0.015)^*$);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.3.b) \times (C.3.f) \times (0.015)^*$ for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.
 4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).
 5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total 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 quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
 3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month

emission limitation for individual 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 quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

4. The deviation reports shall be submitted as specified in General Condition 3 of this permit.
The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, from all facility emission units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

- i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.
- iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.
Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

- i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.
- iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.
Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

- i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.
- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T005 Issuance type: Draft 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>
Tank #5 15,000-gallon fixed roof storage tank	OAC rule 3745-21-09(L)	See A.2.c below.
	OAC rule 3745-35-07	Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s)	VOC Limit	Total HAPs Limit	Individual HAP Limit
1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emission limitations, in tons.
In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113,

P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.

2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., $(C.3.b) \times (C.3.c) \times (0.015)^*$);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.3.b) \times (C.3.f) \times (0.015)^*$ for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions,

in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.

iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T006 Issuance type: Draft 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>
Tank #7 15,000-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s)	VOC Limit	Total HAPs Limit	Individual HAP Limit
1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emission limitations, in tons.
In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., $(C.3.b) \times (C.3.c) \times (0.015)^*$);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.3.b) \times (C.3.f) \times (0.015)^*$ for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and

D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

- i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.
- iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

- i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.
- iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

- i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.
- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T007 Issuance type: Draft 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>
Tank #8 15,000-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s) VOC Limit Total HAPs Limit Individual HAP Limit

1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emission limitations, in tons. In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.

- 2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:

- a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
- b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
- c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

- 3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:

- a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
- b. the volume of each batch, in gallons;
- c. the VOC content of each batch, in pounds per gallon;
- d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., (C.3.b)x(C.3.c)x(0.015)*);

- e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
- f. the individual HAP content of each batch, in pounds of each HAP per gallon;
- g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.3.b) \times (C.3.f) \times (0.015)^*$ for each HAP, for all batches identified in C.3.a during the month); and
- h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

- 4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

- 5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
- 2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
- 3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
- 4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
- 5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
99.0 tpy VOC for entire facility
Applicable Compliance Method:
Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:
 - i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
 - ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.
 - iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank

contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

- i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.
- iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

- i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.
- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T008 Issuance type: Draft 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</u>
---	--------------------------------------	---

<p>Tank #9 15,000-gallon fixed roof storage tank</p>	<p>OAC rule 3745-21-09(L)</p> <p>OAC rule 3745-35-07</p>	<p>Measures</p> <p>See A.2.c below.</p> <p>Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations:</p> <p>99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.</p>
--	--	---

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s) VOC Limit Total HAPs Limit Individual HAP Limit

1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emission limitations, in tons.
In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.
3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., (C.3.b)x(C.3.c)x(0.015)*);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of (C.3.b)x(C.3.f)x(0.015)* for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

4. The permittee shall collect and record the following information each month for all can washing operations:
- the total volume of mill wash employed in all can washing operations, in gallons;
 - the VOC content of the mill wash, in pounds per gallon;
 - the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
- The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
- The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
- The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
- The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

- Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following methods

Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.

iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T009 Issuance type: Draft 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>
Tank #10 15,000-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. **Additional Terms and Conditions**

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s) VOC Limit Total HAPs Limit Individual HAP Limit

1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

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

In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.

- 2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

- 3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., (C.3.b)x(C.3.c)x(0.015)*);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of (C.3.b)x(C.3.f)x(0.015)* for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

- 4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e, (C.4.a)x(C.4.b)x(0.005)*;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;

e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and

f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.

5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

- i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.
- ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.
- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T010 Issuance type: Draft 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>
Tank #11 2,000-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations:

99 tons of volatile organic compounds (VOC);
24.9 tons of all hazardous air pollutants (HAP); and
9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s)	VOC Limit	Total HAPs Limit	Individual HAP Limit
1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons

1-9 81.0 tons 20.25 tons 8.1 tons
 1-10 90.0 tons 22.50 tons 9.0 tons
 1-11 99.0 tons 24.75 tons 9.9 tons
 1-12 99.0 tons 24.90 tons 9.9 tons

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

In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.

2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:

- a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
- b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
- c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.

3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:

- a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
- b. the volume of each batch, in gallons;
- c. the VOC content of each batch, in pounds per gallon;
- d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., $(C.3.b) \times (C.3.c) \times (0.015)^*$);
- e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
- f. the individual HAP content of each batch, in pounds of each HAP per gallon;
- g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.3.b) \times (C.3.f) \times (0.015)^*$ for each HAP, for all batches identified in C.3.a during the month); and
- h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

4. The permittee shall collect and record the following information each month for all can washing operations:

- a. the total volume of mill wash employed in all can washing operations, in gallons;
- b. the VOC content of the mill wash, in pounds per gallon;
- c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
- d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
- e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
- f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.

- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T011 Issuance type: Draft 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>
Tank #13 2,000-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units shall not exceed the following as 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) 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 for the total combined annual emissions from all facility emission units:

Month(s)	VOC Limit	Total HAPs Limit	Individual HAP Limit
1	9.0 tons	2.25 tons	0.9 tons
1-2	18.0 tons	4.50 tons	1.8 tons
1-3	27.0 tons	6.75 tons	2.7 tons
1-4	36.0 tons	9.00 tons	3.6 tons
1-5	45.0 tons	11.25 tons	4.5 tons
1-6	54.0 tons	13.50 tons	5.4 tons
1-7	63.0 tons	15.75 tons	6.3 tons
1-8	72.0 tons	18.00 tons	7.2 tons
1-9	81.0 tons	20.25 tons	8.1 tons
1-10	90.0 tons	22.50 tons	9.0 tons
1-11	99.0 tons	24.75 tons	9.9 tons
1-12	99.0 tons	24.90 tons	9.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emission limitations, in tons.
In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 84 mixers (P001, P003-P010, P015, P016, P018, P019, P021-P023, P024, P025, P034-P048, P053-P063, P067, P068, P076-P095, P114, P124, Z009-Z012, Z015, Z018, Z020, Z024-Z031); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 12 churns (P049-P051, P069-P075, P122, P123); and 11 above-ground storage tanks (T001-T011). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
 2. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total VOC emissions and the rolling, 12-month summation of the total VOC emissions from this facility.

These records shall be generated in accordance with sections C.3 - C.5 of these terms and conditions.
 3. The permittee shall collect and record the following information for each month for the mixers, mills, and churns:
 - a. the name, batch ticket number, and emissions unit identification (i.e., "P001," etc.) of each batch produced at the facility;
 - b. the volume of each batch, in gallons;
 - c. the VOC content of each batch, in pounds per gallon;
 - d. the mass of evaporative loss of VOC from each batch, in pounds (i.e., $(C.3.b) \times (C.3.c) \times (0.015)^*$);
 - e. the total monthly VOC emissions from all batches, in pounds (i.e., the sum of the values recorded in C.3.d for all batches identified in C.3.a);
 - f. the individual HAP content of each batch, in pounds of each HAP per gallon;
 - g. the total, individual HAP emissions from all batches, in pounds (i.e., the sum of $(C.3.b) \times (C.3.f) \times (0.015)^*$ for each HAP, for all batches identified in C.3.a during the month); and
 - h. the total, combined HAPs emissions from all batches, in pounds (i.e., the sum of the individual HAP emissions from C.3.g, for all batches identified in C.3.a during the month).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.
 4. The permittee shall collect and record the following information each month for all can washing operations:
 - a. the total volume of mill wash employed in all can washing operations, in gallons;
 - b. the VOC content of the mill wash, in pounds per gallon;
 - c. the total mass of VOC from mill wash emitted as fugitive emissions, in pounds, i.e., $(C.4.a) \times (C.4.b) \times (0.005)^*$;
 - d. the individual HAP content of the mill wash, in pounds of each HAP per gallon;
 - e. the total, individual HAP emissions from all can washing operations, in pounds, i.e., $(C.4.a) \times (C.4.d) \times (0.005)^*$ for each HAP; and
 - f. the total, combined HAPs emissions from all can washing operations, in pounds, i.e., the sum of the individual HAP emissions recorded in C.4.e.

* AP-42 emission factor for "closed loop" solvent systems

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).
 5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using USEPA's "Tanks Program 3.1" software.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
 2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.
 3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations listed in section A.2.b of these terms and conditions.

4. The deviation reports shall be submitted as specified in Part I, General Condition 3 of this permit.
5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total HAPs emissions, in tons, from all facility emissions units. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

99.0 tpy VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 0.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

24.9 tpy combined HAPs for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using USEPA's "Tanks Program 3.1" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 0.5% of mill wash HAP content employed.

iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.