



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
FAIRFIELD COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 01-01310

Fac ID: 0123010255

DATE: 10/19/2006

Crown Cork and Seal Co (USA) Inc
Mike Damato
One Crown Way
Philadelphia, PA 19154-4599

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

CDO



Permit To Install
Terms and Conditions

Issue Date: 10/19/2006
Effective Date: 10/19/2006

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-01310

Application Number: 01-01310
Facility ID: 0123010255
Permit Fee: **\$400**
Name of Facility: Crown Cork and Seal Co (USA) Inc
Person to Contact: Mike Damato
Address: One Crown Way
Philadelphia, PA 19154-4599

Location of proposed air contaminant source(s) [emissions unit(s)]:
**940 Mill Park Dr
Lancaster, Ohio**

Description of proposed emissions unit(s):
K004 - Coating line no. 2 K005 - Coating/print line no. 3.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

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4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to

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the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

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12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	134.9
HAPs	24.9
HAP	9.9
PE	0.25

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K004) - Metal Closure Coating Line No. 2 with PTE vented to thermal incinerator. The terms of this permit supercede those identified in PTI No. 01-5176 issued December 29, 1994.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	<p>Emissions shall not exceed:</p> <p>19.6 lbs/hr and 85.8 tons/yr VOC from coatings and cleanup materials.</p> <p>0.04 lb/hr and 0.18 tons/yr particulate emissions (PE) from coating operation.</p> <p>1.01 lbs VOC / gallon of coating solids applied.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-35-07(B)(1).</p>
OAC rule 3745-35-07(B)(1) (synthetic minor to avoid Title V)	The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for any single HAP and 24.9 tons per rolling 12-month period for all HAPs from all coating and cleanup materials used in units K001, K002, K004, and K005, combined.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the requirement specified in OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(U)(1)(i)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the requirement specified in OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The above hourly and annual emission limitations for VOC and PE were established to reflect the potential to emit for these emissions units. However, with the exception of implementation and record keeping of the control measures identified below, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

2.b The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed.

The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
- b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
- c. the direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H₂O);
- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "b", shall be completely closed to any air movement during process operations; and
- e. all VOC emissions shall be captured and contained for discharge through the control device.

2.c The permanent total enclosure (PTE) serving this emissions unit shall be

Emissions Unit ID: K004

maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emissions unit is in operation.
3. Emissions from this emissions unit shall be vented to a thermal oxidizer with a destruction removal efficiency (DRE) of at least 95%.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the purpose of determining VOC emissions:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the "as applied" VOC content of each coating, in lbs VOC/gallon;
 - c. the "as applied" VOC content of each coating in lbs VOC/gallon of solids, i.e., the weight of VOC per gallon of coating, where the coating volume is determined less VOC, water and exempt solvents;
 - d. the volume of each coating applied, in gallons of solids;
 - e. the VOC content of each cleanup material, in lbs VOC/gallon;
 - f. the volume of each cleanup material employed, in gallons;
 - g. the number of days of operation;
 - h. the total hours of operation;
 - i. the calculated, controlled average daily VOC emission rate, controlled at the overall control efficiency (CE) demonstrated during the most recent compliance demonstration, in accordance with the following equation: $(1 - CE) \times (1/B.III.1.g) \times ([\text{sum of } (A.III.1.c) \times (A.III.1.d)] \text{ for all coatings identified in$

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- A.III.1.a)+[sum of (A.III.1.e)x(A.III.1.f) for all cleanup materials identified in A.III.1.a)];
- j. the calculated, controlled average hourly VOC emission rate, in accordance with the following equation: $(1-CE) \times (1/A.III.1.h) \times ([\text{sum of } (A.III.1.c) \times (A.III.1.d) \text{ for all coatings identified in A.III.1.a}] + [\text{sum of } (A.III.1.e) \times (A.III.1.f) \text{ for all cleanup materials identified in A.III.1.a}])$; and
 - k. the calculated, controlled average daily VOC emission rate, controlled at the overall control efficiency (CE) demonstrated during the most recent compliance demonstration, in lbs VOC/gallon of coating solids applied, in accordance with the following equation: $(1-CE) \times (1/A.III.1.g) \times ([\text{sum of } (A.III.1.c) \times (A.III.1.d) \text{ for all coatings identified in A.III.1.a}] / [\text{sum of A.III.1.d for all coatings identified in A.III.1.a}])$.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K004, and K005:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;

Emissions Unit ID: K004

- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material);
- j. the total combined HAPs emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material);
- k. the updated rolling, 12-month summation of emissions for each individual HAP in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. the updated rolling, 12-month summation of emissions for total combined HAPs in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and
 - b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.
- 4. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance

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with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
- b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

5. The permit to install for this emissions unit (K004) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (mg/m³): 10.34

Maximum Hourly Emission Rate (lbs/hr): 19.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1755.0

MAGLC (ug/m³): 10,338

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee

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determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that (a) the calculated, controlled average hourly VOC emission rate exceeds the applicable emission limitation of 19.6 lbs VOC/hr, and/or (b) the calculated, controlled average VOC emission rate exceeds the applicable emission limitation of 1.01 lbs VOC/gallon of solids applied. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports to Ohio EPA, Central District Office, which indicate the total VOC emissions from this emissions unit for the previous calendar year, based on the record keeping required in section B.III.1 of these terms and conditions. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all one-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.
4. The permittee shall submit quarterly summaries of the records which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance and/or any records of downtime for the capture (collection) system,

Emissions Unit ID: K004

the thermal oxidizer, or the monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

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

Modification Issued: 10/19/2006

- a. Emissions Limitation:
19.6 lbs/hr of VOC from coating operations.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section III.1.
- b. Emissions Limitation:
85.8 tons/ year of VOC from coating operations.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section A.III.1.
- c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units K001, K002, K004, and K005, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.
- d. Emission Limitation:
The combined total HAPs emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units K001, K002, K004, and K005, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.
- e. Emissions Limitation:
Visible PE from any stack shall not exceed 20% opacity as a 6-minute average

Applicable Compliance Method:
If required by Ohio EPA and/or U.S. EPA, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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- f. Emissions Limitation:
1.01 lbs VOC / gallon of coating solids applied.

Applicable Compliance Method:

Compliance with the VOC content of the coatings applied in this emissions unit shall be determined through monthly record keeping, as specified in Section A.III.1. Formulation data from the coating manufacturer and/or, if required, USEPA Method 24 (or an alternative approved method) shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

- g. Emission Limitation:
0.04 lb/hr and 0.18 tons/yr PE from coating operation.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor of 7.5×10^{-3} lb PE / MMBTU is obtained from USEPA's AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4 -2, July 1998.

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

- h. Emission Limitation:
Emissions from this emissions unit shall be vented to a thermal afterburner with a DRE of at least 95%.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A, as appropriate.

- i. Emission Limitation:
100% capture of VOC emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 51

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Appendix M, Method 204 and 40 CFR Part 60, Appendix A, Method 2 as appropriate.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K004) - Metal Closure Coating Line No. 2 with PTE vented to thermal incinerator. The terms of this permit supercede those identified in PTI No. 01-5176 issued December 29, 1994.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Modification Issued: 10/19/2006

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K005) - Metal Closure Print and Coating Line with PTE vented to thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-5176 issued on December 29, 1994.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	<p>Emissions shall not exceed:</p> <p>11.2 lbs/hr and 49.1 tons/yr VOC from coatings and cleanup materials.</p> <p>0.02 lb/hr and 0.07 tons/yr particulate emissions (PE) from coating operation.</p> <p>1.17 lbs VOC / gallon of coating solids applied.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-35-07(B)(1).</p>
OAC rule 3745-35-07(B)(1) (synthetic minor to avoid Title V)	The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for any single HAP and 24.9 tons per rolling 12-month period for all HAPs from all coating and cleanup materials used in units K001, K002, K004, and K005, combined.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the requirement specified in OAC rule 3745-31-05(A)(3).

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OAC rule 3745-21-09(U)(1)(i)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the requirement specified in OAC rule 3745-31-05(A)(3).
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2. Additional Terms and Conditions

- 2.a** The above hourly and annual emission limitations for VOC and PE were established to reflect the potential to emit for these emissions units. However, with the exception of implementation and record keeping of the control measures identified below, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b** The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed.

The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
- b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
- c. the direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H₂O);
- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "b", shall be

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completely closed to any air movement during process operations; and

- e. all VOC emissions shall be captured and contained for discharge through the control device.

- 2.c** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emissions unit is in operation.
3. Emissions from this emissions unit shall be vented to a thermal oxidizer with a destruction removal efficiency (DRE) of at least 95%.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the purpose of determining VOC emissions:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the "as applied" VOC content of each coating, in lbs VOC/gallon;
 - c. the "as applied" VOC content of each coating in lbs VOC/gallon of solids, i.e., the weight of VOC per gallon of coating, where the coating volume is determined less VOC, water and exempt solvents;
 - d. the volume of each coating applied, in gallons of solids;
 - e. the VOC content of each cleanup material, in lbs VOC/gallon;
 - f. the volume of each cleanup material employed, in gallons;
 - g. the number of days of operation;

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- h. the total hours of operation;
 - i. the calculated, controlled average daily VOC emission rate, controlled at the overall control efficiency (CE) demonstrated during the most recent compliance demonstration, in accordance with the following equation: $(1-CE) \times (1/B.III.1.g) \times ([\text{sum of } (A.III.1.c) \times (A.III.1.d) \text{ for all coatings identified in } A.III.1.a] + [\text{sum of } (A.III.1.e) \times (A.III.1.f) \text{ for all cleanup materials identified in } A.III.1.a])$;
 - j. the calculated, controlled average hourly VOC emission rate, in accordance with the following equation: $(1-CE) \times (1/A.III.1.h) \times ([\text{sum of } (A.III.1.c) \times (A.III.1.d) \text{ for all coatings identified in } A.III.1.a] + [\text{sum of } (A.III.1.e) \times (A.III.1.f) \text{ for all cleanup materials identified in } A.III.1.a])$; and
 - k. the calculated, controlled average daily VOC emission rate, controlled at the overall control efficiency (CE) demonstrated during the most recent compliance demonstration, in lbs VOC/gallon of coating solids applied, in accordance with the following equation: $(1-CE) \times (1/A.III.1.g) \times ([\text{sum of } (A.III.1.c) \times (A.III.1.d) \text{ for all coatings identified in } A.III.1.a] / [\text{sum of } A.III.1.d \text{ for all coatings identified in } A.III.1.a])$.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K004, and K005:
- a. the name and identification number of each coating, as applied;
 - b. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;

Emissions Unit ID: K005

- g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material);
- j. the total combined HAPs emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material);
- k. the updated rolling, 12-month summation of emissions for each individual HAP in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. the updated rolling, 12-month summation of emissions for total combined HAPs in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and
 - b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.
- 4. The permittee shall install, operate, and maintain a continuous temperature monitor

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and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
- b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

5. The permit to install for this emissions unit (K005) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (mg/m³): 10.34

Maximum Hourly Emission Rate (lbs/hr): 11.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1755.0

MAGLC (ug/m³): 10,338

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that (a) the calculated, controlled average hourly VOC emission rate exceeds the applicable emission limitation of 19.6 lbs VOC/hr, and/or (b) the calculated, controlled average VOC emission rate exceeds the applicable emission limitation of 1.01 lbs VOC/gallon of solids applied. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports to Ohio EPA, Central District Office, which indicate the total VOC emissions from this emissions unit for the previous calendar year, based on the record keeping required in section B.III.1 of these terms and conditions. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all one-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.
4. The permittee shall submit quarterly summaries of the records which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance and/or any records of downtime for the capture (collection) system,

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the thermal oxidizer, or the monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

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

Modification Issued: 10/19/2006

- a. Emissions Limitation:
11.2 lbs/hr of VOC from coating operations.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section A.III.1.
- b. Emissions Limitation:
49.1 tons/ year of VOC from coating operations.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section A.III.1.
- c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units K001, K002, K004, and K005, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.
- d. Emission Limitation:
The combined total HAPs emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units K001, K002, K004, and K005, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.
- e. Emissions Limitation:
Visible PE from any stack shall not exceed 20% opacity as a 6-minute average

Applicable Compliance Method:
If required by Ohio EPA and/or U.S. EPA, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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- f. Emissions Limitation:
1.17 lbs VOC / gallon of coating solids applied.

Applicable Compliance Method:

Compliance with the VOC content of the coatings applied in this emissions unit shall be determined through monthly record keeping, as specified in Section A.III.1. Formulation data from the coating manufacturer and/or, if required, USEPA Method 24 (or an alternative approved method) shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

- g. Emission Limitation:
0.02 lb/hr and 0.07 tons/yr PE from coating operation.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor of 7.5×10^{-3} lb PE / MMBTU is obtained from USEPA's AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4 -2, July 1998.

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

- h. Emission Limitation:
Emissions from this emissions unit shall be vented to a thermal afterburner with a DRE of at least 95%.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A, as appropriate.

- i. Emission Limitation:
100% capture of VOC emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 51

Crown Cork and Seal Co (USA) Inc
DTI Application: 01 01210

Facility ID: 012301025

Emissions Unit ID: K005

Appendix M, Method 204 and 40 CFR Part 60, Appendix A, Method 2 as appropriate.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K005) - Metal Closure Print and Coating Line with PTE vented to thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-5176 issued on December 29, 1994.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None