



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

8/5/2009

Certified Mail

Mr. Daniel Brown
Metal Container Corporation
350 McCormick Boulevard
Columbus, OH 43213-1586

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0125040914
Permit Number: P0104113
Permit Type: Administrative Modification
County: Franklin

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-CDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Metal Container Corporation

Issue Date: 8/5/2009
Permit Number: P0104113
Permit Type: Administrative Modification
Permit Description: Synthetic Minor permit to avoid PSD
Facility ID: 0125040914
Facility Location: Metal Container Corporation
350 McCormick Boulevard,
Columbus, OH 43213-1586
Facility Description: Metal Can Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Natalie Parsons at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Proposed administrative modification to four existing can coating lines, K007-K010. Each two piece can line applies a basecoat, rim varnish, overvarnish, and/or inside spray. Can lines 1-3, K007-K009, currently operate at 1600 cans per minute while can line four, K010, operates at 1400 cans per minute. These emission units were previously permitted by PTI 01-1399, which established a total facility VOC limit of 383.7 tons per year.

3. Facility Emissions and Attainment Status:

Metal Container Corporation, facility ID 0125040914, is a Title V facility located in Franklin County. The total emissions for the facility are currently permitted at 383.7 tons VOC per year. Franklin County is Non-Attainment for Ozone and PM_{2.5}. The administrative modification to the can lines' previously issued permit represents no change in the matter of operation and no increase in facility emissions. These emission units are not subject to the can coating MACT.

4. Source Emissions:

For all can lines, K007-K010, the following will apply:

3745-31-05(D) -Synthetic Minor to avoid PSD
-Rolling 12-month rolling summation of 383.7 tons VOC per year
-Maximum production rate, K007-K010, of 2,950,771,000 cans coated per year
-Facility wide HAPs emissions of less than 9.9 tons individual and 24.9 tons total per year.

3745-31-05(A)(3) -VOC per gallon limits are based on current operations plus 10% and are more restrictive than NSPS Subpart WW.
-Particulate emissions are based on worst case scenario while utilizing inside spray assuming 6% overspray and 40% control efficiency (equivalent to 3745-17-11(B)(2))
-Natural gas usage will be limited to 310 MMCF per year as a 12-month rolling summation and the emissions calculations for NO_x, CO, VOC, and PE are based on AP-42 factors for natural gas. (ex. 310 MMCF*100 lbs/MMCF/2000 lbs/ton=15.5lbs NO_x/hr, 67.89TPY)
-Can line speeds shall not exceed 1600 cans per minute for K007-K009 and 1400 cans per minute for K010.

3745-17-07(A)(1) -20% visible particulate emissions as a rolling 6-minute average. (Not subject to 3745-17-11 based on exemption from 3745-17-11(A)(h))



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104113
Facility ID: 0125040914

5. Conclusion:

This permit modification will be issued draft as a Synthetic Minor permit to avoid PSD to streamline emission unit specific requirements to ensure continuing federal enforceability. These changes will be reflected in the Title V renewal permit.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>383.7</u>
<u>NOx</u>	<u>67.9</u>
<u>CO</u>	<u>57</u>
<u>PE</u>	<u>5.16</u>



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install
for
Metal Container Corporation**

Facility ID: 0125040914
Permit Number: P0104113
Permit Type: Administrative Modification
Issued: 8/5/2009
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Metal Container Corporation

Table of Contents

- Authorization 1
- A. Standard Terms and Conditions 3
 - 1. Federally Enforceable Standard Terms and Conditions 4
 - 2. Severability Clause 4
 - 3. General Requirements 4
 - 4. Monitoring and Related Record Keeping and Reporting Requirements 5
 - 5. Scheduled Maintenance/Malfunction Reporting 6
 - 6. Compliance Requirements 6
 - 7. Best Available Technology 7
 - 8. Air Pollution Nuisance 7
 - 9. Reporting Requirements 7
 - 10. Applicability 8
 - 11. Construction of New Sources(s) and Authorization to Install 8
 - 12. Permit-To-Operate Application 9
 - 13. Construction Compliance Certification 9
 - 14. Public Disclosure 9
 - 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
 - 16. Fees 9
 - 17. Permit Transfers 10
 - 18. Risk Management Plans 10
 - 19. Title IV Provisions 10
- B. Facility-Wide Terms and Conditions 11
- C. Emissions Unit Terms and Conditions 13
 - 1. Emissions Unit Group - Two Piece Can Lines: K007, K008, K009, K010, 14



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104113

Facility ID: 0125040914

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125040914
Facility Description: Metal cans
Application Number(s): A0036258
Permit Number: P0104113
Permit Description: Synthetic Minor permit to avoid PSD
Permit Type: Administrative Modification
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/5/2009
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Metal Container Corporation
350 McCormick Boulevard
Columbus, OH 43213-1586

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104113

Facility ID: 0125040914

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104113
 Permit Description: Synthetic Minor permit to avoid PSD

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Two Piece Can Lines

Emissions Unit ID:	K007
Company Equipment ID:	Can Line No. 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	Can Line No. 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K009
Company Equipment ID:	Can Line No. 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K010
Company Equipment ID:	Can Line No. 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104113

Facility ID: 0125040914

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



(2) 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 the Ohio EPA DAPC, Central District Office. 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 A.15. below if no deviations occurred during the quarter.

(3) 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 Ohio EPA DAPC, Central District Office 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

5. **Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office 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).

6. **Compliance Requirements**

a) 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.

b) 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.

c) 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:



- (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Ohio EPA DAPC, Central District Office.
- 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 Ohio EPA DAPC, Central District Office. 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) 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.
- b) If applicable, authorization to install any new 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 has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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.

16. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104113

Facility ID: 0125040914

Effective Date: To be entered upon final issuance

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

18. 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.

19. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104113

Facility ID: 0125040914

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104113

Facility ID: 0125040914

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104113

Facility ID: 0125040914

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Two Piece Can Lines: K007, K008, K009, K010,

EU ID	Operations, Property and/or Equipment Description
K007	Can Line No. 1
K008	Can Line No. 2
K009	Can Line No. 3
K010	Can Line No. 4

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(4) – d)(7) and e)(4)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid PSD)	<p>Volatile organic compound (VOC) emissions from K007-K010 shall not exceed, as a rolling 12-month summation, 383.7 tons per year from coating and cleanup material usage.</p> <p>See. b)(2)a., b)(2)b., b)(2)c and b)(2)f. below.</p>
b.	OAC rule 3745-31-05(A)(3)	<p><u>Coatings Emissions</u> VOC emissions from the coating operations shall not exceed the following:</p> <p>Basecoat: 2.0 lb VOC/gal excluding water and exempt solvents;</p> <p>Overvarnish: 2.0lb VOC/gal excluding water and exempt solvents;</p> <p>Inside Spray: 3.7 lb VOC/gal excluding water and exempt solvents; and,</p> <p>Rim Varnish: 2.0lb VOC/ gal excluding water and exempt solvents.</p> <p><u>Emissions from the combustion of natural gas as fuel in the ovens shall not exceed the following:</u></p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>15.5 lbs of nitrogen oxide (NOx)/hr and 67.9 tons of NOx/yr;</p> <p>13.02 lbs of carbon monoxide (CO)/hr and 57.0 tons of CO/yr;</p> <p>1.18 lbs of PE/hr and 5.16 tons of PE/yr;</p> <p>0.85 lbs of VOC/hr and 3.73 tons of VOC/yr;</p> <p>See b)(2)d. and b)(2)e. below.</p>
c.	OAC rule 3745-21-09(D)	The emissions limitations specified in this rule are less stringent than the limitations specified in OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart WW	The emissions limitations specified in this rule are less stringent than the limitations specified in OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)(2)	Particulate emissions (PE) from coating overspray shall not exceed 1.72 lbs PE/hr and 7.5 tons PE/yr.
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from each stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

- a. The maximum production rate from emission units K007-K010 shall not exceed a total of 2,950,771,000 cans coated per year, as a rolling, 12-month summation.
- b. Emission units K007-K010 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC emissions, upon issuance of this permit.
- c. The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 9.9 tons and 24.9 tons per year, respectively by limiting the cans coated per year of K007-K010 to less than 2,950,771,000 can coated per year per year.
- d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-11(B)(2), and OAC rule 3745-17-07(A)(1).
- e. Each can line shall not exceed 1600 cans per minute for can lines K007, K008, K009 and 1400 cans per minute for can line K010.



- f. The maximum natural gas usage for K007-K010 shall be limited to 310 million cubic feet (MMCF) per year, as a rolling, 12-month summation.
- c) Operational Restrictions
- (1) None
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following for emissions units K007-K010:
 - a. the company identification of each coating and cleanup material employed;
 - b. the total number of gallons of each coating and cleanup material employed;
 - c. the volatile organic compound (VOC), individual hazardous air pollutant (HAP), and total HAP content of each coating and cleanup material employed, in pounds per gallon;
 - d. the VOC, individual HAP, and total HAP emissions from each coating and cleanup material employed, in pounds;
 - e. the total VOC, individual HAP, and total HAP emissions from the emission units for all coatings and cleanup materials employed, in pounds;
 - f. the updated rolling, 12-month summation of the total VOC individual HAP, and total HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - g. the total gallons of all coatings and cleanup materials employed for all coatings and cleanup materials employed; and,
 - h. the updated rolling, 12-month summation for usage of all coatings and cleanup materials employed, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
 - (2) The permittee shall collect and record the following for emissions units K007-K010 on a monthly basis:
 - a. the total natural gas usage, in MMCF; and
 - b. the rolling, 12-month summation of natural gas usage, in MMCF.
 - (3) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of coating applied during the month;
 - b. the maximum daily volume-weighted average VOC content calculated for $(C_{VOC,2})_A$ during the month;



- c. the total VOC emissions from all coatings applied during the month, i.e., the product of the “a” times “b”;
- d. the name and identification of each cleanup material employed;
- e. the VOC content of each cleanup material, in pounds per gallon;
- f. the number of gallons of each cleanup material employed;
- g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of “e” times “f” for all cleanup materials employed; and
- h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of “c” and “g”.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- (4) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K007-K010, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute[®], ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A[®], as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices[®]; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices[®]; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).



- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., $\frac{AX}{8}$ hours per day and $\frac{AY}{5}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or $\frac{AWorst\ case}{}$ toxic contaminant(s):

Toxic Contaminant: Formaldehyde

TLV (mg/m³): 9 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 0.337 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4.56 ug/m³

MAGLC (ug/m³): 8.76

Toxic Contaminant: EGBE (glycol ether)

TLV (mg/m³): 2302 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 2.4 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 131.87 ug/m³

MAGLC (ug/m³): 2302.07

The permittee, has demonstrated that emissions of formaldehyde and EGBE, from emissions units K007-K010 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the $\frac{AToxic\ Air\ Contaminant\ Statute}{}$, ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration $\frac{A}{}$, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute 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 a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 383.7 tons VOC per year as a rolling, 12-month summation;
 - ii. 310 MMCF of natural gas usage per year, as a rolling, 12-month summation;
 - iii. a maximum production rate of 2,950,771,000 cans coated per year, as a rolling, 12-month summation.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall notify the Central District Office in writing of each daily record showing an exceedance of the VOC content limitations in b)(1)b. above. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the exceedance occurs.
- (3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.



f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions from K007-K010 shall not exceed, as a rolling 12-month summation, 383.7 tons per year from coating and cleanup material usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in section d)(2) of the terms and conditions of this permit.

b. Emission Limitations:

Inside Spray- 3.7 lbs VOC/gallon, excluding water and exempt solvents
Overvarnish – 2.0 lbs VOC/ gallon, excluding water and exempt solvents
Basecoat- 2.0 lbs VOC/gallon, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(3) of the terms and conditions of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

c. Emission Limitation:

1.72 lbs of PE per hour and 7.5 tons/yr from coating overspray

Applicable Compliance Method

Compliance with the hourly particulate emission limitation shall be based on the worst case scenario from inside spray determined by utilizing the following equation:

$$E = \text{inside spray application rate (gal/hr)} \times \text{density (lb/gal)} \times \text{solids content (\%)} \times (1-TE) \times (1-CE) / \text{annual operating time (hr)}$$

Where:

E= particulate emission rate (lbs/hr)

TE= transfer efficiency

CE= capture efficiency

If required, the permittee shall determine compliance in accordance with 40 CFR Part 60, Appendix A, Method 5.



Compliance with the annual emission limitation may be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by a conversion factor of 2000 pounds per ton.

d. Emission Limitation:

15.5 lbs NOx per hour from combustion of natural gas

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum MMCF of natural gas combusted/hour by the AP 42 factor of 100 lbs/MMCF (AP-42, Section 1.4, Table 1.4-1[7/98])

e. Emission Limitation:

67.89 tons NOx per year from combustion of natural gas

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by a conversion factor of 2000 lbs per ton.

f. Emission Limitation:

13.02 lbs CO per hour from combustion of natural gas

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum MMCF of natural gas combusted/hour by the AP 42 factor of 84 lbs/MMCF (AP-42, Section 1.4, Table 1.4-1[7/98])

g. Emission Limitation:

57.0 tons CO per year from combustion of natural gas

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by a conversion factor of 2000 lbs per ton.

h. Emission Limitation:

1.18 lbs PE per hour from combustion of natural gas



Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum MMCF of natural gas combusted/hour by the AP 42 factor of 7.6 lbs/MMCF (AP-42, Section 1.4, Table 1.4-1[7/98])

i. Emission Limitation:

5.16 tons PE per year from combustion of natural gas

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by a conversion factor of 2000 lbs per ton.

j. Emission Limitation:

Visible particulate emissions from each stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.