Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

3/10/2010

Certified Mail

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

John Kupa
Crown Cork & Seal
5201 Enterprise Blvd
Toledo, OH 43612

RE: FINAL AIR POLLUTION PERMIT-TO-INSTAL
Facility ID: 0448010466
Permit Number: P0105929
Permit Type: Administrative Modification
County: Lucas

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Kevin Boyce," 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
TDES; Michigan; Indiana; Canada

50 West Town Street, Suite 700
P.O. Box 1049
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Ohio | Environmental Protection Agency

# FINAL

# Division of Air Pollution Control
# Permit-to-Install
for
Crown Cork & Seal

Facility ID: 0448010466
Permit Number: P0105929
Permit Type: Administrative Modification
Issued: 3/10/2010
Effective: 3/10/2010

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install**
for
Crown Cork & Seal

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# Authorization

Facility ID: 0448010466
Facility Description: Metal coil coating facility.
Application Number(s): M0000707
Permit Number: P0105929
Permit Description: This Administrative Modification allows for use of the monitoring methods specified in 40 CFR Part 63 Subpart SSSS.
Permit Type: Administrative Modification
Permit Fee: $100.00
Issue Date: 3/10/2010
Effective Date: 3/10/2010

This document constitutes issuance to:

Crown Cork & Seal
5201 Enterprise Blvd
Toledo, OH 43612

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

# Authorization (continued)

Permit Number: P0105929
Permit Description: This Administrative Modification allows for use of the monitoring methods specified in 40 CFR Part 63 Subpart SSSS.

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

| | |
|---|---|
| **Emissions Unit ID:** | **K001** |
| Company Equipment ID: | 66 inch coil coating line |
| Superseded Permit Number: | 04-01352 |
| General Permit Category and Type: | Not Applicable |

# 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 Toledo Department of Environmental Services.

(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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services.

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 Toledo Department of Environmental Services. 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 by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown 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 reporting requirements identified in this permit 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 deviation report, 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.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**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.

# B. Facility-Wide Terms and Conditions

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.

# C. Emissions Unit Terms and Conditions

**1. K001, 66 inch coil coating line**

**Operations, Property and/or Equipment Description:**

66-inch aluminum coil coating line with a 16 mmBtu/hr direct fired natural gas drying oven controlled by a permanent total enclosure and 7.5 mmBtu/hr catalytic incinerator

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) None.

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(A)(3)<br>(PTI 04-1352 issued 01/27/2005) | Carbon monoxide (CO) emissions shall not exceed 1.9 pounds per hour and 8.3 tons per year.<br>Nitrogen oxides (NOx) emissions shall not exceed 2.3 pounds per hour and 10.07 tons per year.<br>Particulate emissions (PE) shall not exceed 0.04 pound per hour and 0.18 ton per year.<br>Sulfur dioxide (SO2) emissions shall not exceed 0.01 pound per hour and 0.04 ton per year.<br>Volatile organic compounds (VOC) emissions from coatings and cleanup materials shall not exceed 70.0 pounds per hour.<br>see b)(2)a. through b)(2)d. |
| b. | OAC rule 3745-31-05(D)<br>(PTI 04-01352 issued 1/27/2005) | VOC emissions from coatings and cleanup materials shall not exceed 182.1 tons per year, based upon a rolling, 365-day summation of the daily emissions. |
| c. | OAC rule 3745-17-07(A)(1) | see b)(2)e. |
| d. | OAC rule 3745-17-11(A)(2) | see b)(2)f. |
| e. | OAC rule 3745-18-06(A) | see b)(2)f. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| f. | OAC rules 3745-21-09(E) and 3745-21-09(B)(6) | see b)(2)f. |
| g. | 40 CFR Part 60 subpart TT | see b)(2)g. |
| h. | 40 CFR Part 63 subpart A<br>(40 CFR 63.1 – 16) | Table 2 of 40 CFR Part 63 subpart SSSS provides cross-references, indicating which parts of the General Provisions apply. |
| i. | 40 CFR Part 63, Subpart SSSS<br>(40 CFR 63.5080 – 5201)<br>[This metal coil coating line is subject to the emission standards in 63.5120.] | The permittee shall comply with one of the following emission standards:<br>98% overall control of organic HAP for each month during each 12-month compliance period;<br>0.046 kilogram of organic HAP per liter (0.38 lb/gal) of solids applied during each 12-month compliance period; or<br>100% capture efficiency and organic HAP emissions shall not exceed 20 parts per million by volume (ppmv) on a dry basis. |

(2) Additional Terms and Conditions

a. The permittee shall operate and maintain a permanent total enclosure and a catalytic incinerator to capture and control the VOC emissions.

b. The permittee shall maintain a minimum of 90% overall control efficiency for the VOC emissions from this emissions unit.

c. The permittee shall maintain a permanent total enclosure that shall capture 100% of the VOC emitted by the coating applicator.

d. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-21-09(E), and 3745-21-09(B)(6).

e. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

g. This emissions unit is not subject to the requirements of 40 CFR Part 60 subpart TT, since it was installed prior January 5, 1991, and the permittee has indicated that it has not been modified or reconstructed after this date.

c) Operational Restrictions

(1) This emissions unit shall be totally enclosed such that all the VOC emissions are captured for venting to the catalytic incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 meters per hour (200 feet per minute);

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water as a 3-hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in c)(1)b. and are not included in the calculations in c)(1)c. shall be closed during routine operation of the process; and

g. all VOC emissions from the coating line must be captured and contained for discharge to the catalytic incinerator.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

(3) The permittee shall develop and implement an inspection and maintenance plan for the catalytic oxidizer serving this emissions unit. The plan must address, at a minimum, the following elements.

a. Annual sampling and analysis of the catalyst activity (i.e., conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures.

b. Monthly inspection of the oxidizer system including the burner assembly and fuel supply lines for problems; and,

c. Annual internal and monthly external visual inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found, the permittee shall take corrective action consistent with the manufacturer's recommendations and conduct a new performance test to determine destruction efficiency according to 40 CFR 63.51560.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(4) The maximum annual volatile organic material usage (coating and cleanup solvent) for this emissions unit shall not exceed 1,821 tons per year, based upon a rolling, 365-day summation of the daily volatile organic material usage figures.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(5) The permittee shall burn only natural gas as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(6) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63 Subpart SSSS, including the following sections:

| | |
|---|---|
| 63.5121(a) | establishes capture and control device operating limits to be met at all times |

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day, all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column whenever the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are 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 monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. (If a SIP change is approved removing the recordkeeping and reporting requirement for temperature differential, then the requirement to install, operate, and maintain a temperature monitor and recorder that measures the temperature downstream of the incinerator's catalyst bed shall become void upon approval of the SIP change by U.S. EPA.)

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;

(Note: This requirement requires reporting on a more stringent basis than that required under OAC rule 3745-21-09(B)(4)(b)(iii) since the permittee has requested to monitor on the same basis as that required under 40 CFR 63.5160(d)(3)((ii)(C).)

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; (If a SIP change is approved removing the recordkeeping and reporting requirement for temperature differential, then this term and condition will become void upon approval of the SIP change by U.S. EPA.) and

c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(4)(b)]

(4) The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the total uncontrolled VOC emissions from all coatings, in pounds per day;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the uncontrolled VOC content of each cleanup material, in pounds per gallon;

g. the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;

h. the daily uncontrolled VOC emissions from all coatings and cleanup materials, i.e., (c. + g., in pounds per day);

i. the daily controlled VOC emissions from all coatings and cleanup materials, in pounds per day, calculated using the overall control efficiency for the control

equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

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

k. the average hourly controlled VOC emissions from all coatings and cleanup materials, in pounds per hour, calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance, i.e. (i./j.);

l. the annual controlled VOC emissions, based upon a rolling, 365-day summation of the daily emissions;

m. the daily volatile organic material usage, in pounds per day; and

n. the rolling, 365-day summation of the volatile organic material usage figures, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)].

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63 Subpart SSSS, including the following sections:

| | |
|---|---|
| 63.5150(a)(1) | Bypass monitoring for intermittently-controllable work stations |
| 63.5150(a)(2) | Continuous emission monitoring system (CEMS) requirements if using a CEMS to demonstrate compliance |
| 63.5150(a)(3) | Temperature monitoring of oxidizers |
| 63.5150(a)(4) | Capture system monitoring |
| 63.5170(a) | If using as-purchased compliant coatings |
| 63.5170(b) | If using as-applied compliant coatings |
| 63.5170(c) | If using capture and control device to reduce emissions to no more than allowable limit |
| 63.5170(d) | If using capture and control to achieve the emission rate limit |

| | |
|---|---|
| 63.5170(e) | If using solvent recovery to demonstrate compliance |
| 63.5170(f) | Use of oxidation to demonstrate compliance |
| 63.5170(g) | If using a combination of capture and control |
| 63.5190(a)(1) | Beginning and ending dates of each compliance option used |
| 63.5190(a)(2) | Records of all measurements needed to demonstrate compliance |
| 63.5190(a)(3) | Records specified in 63.10(b)(3) |
| 63.5190(a)(4) | Records if using CEMS |
| 63.5190(a)(5) | Records of liquid-liquid material balances |

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:

a. each day during which the calculated, controlled VOC emission rate exceeded 70 pounds per hour;

b. each day during which the calculated, controlled VOC emission rate exceeded 182.1 tons per year as rolling, 365-day summation of the daily emissions;

c. each day during which the volatile organic material usage exceeded 1,821 tons per year, based upon a rolling, 365-day summation daily usage figures;

d. all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column when the emissions unit was in operation;

e. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was below the average temperature established during the most recent emission tests that demonstrated the emissions unit(s) was/were in compliance; and

f. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference established during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. (Note that although reporting of the temperature differential

summary is required by OAC rule 3745-21-09(B)(4)(c), temperature differential readings less than 80 percent of the average temperature difference established during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance are not excursions or deviations, since the permittee has chosen to implement a site-specific inspection and maintenance program for the catalytic incinerator. If a SIP change is approved during the term of this permit as specified under OAC rule 3745-21-09(B)(5) to remove the recordkeeping and reporting requirement for temperature differential, then this term and condition will become void upon approval of the SIP change by U.S. EPA.)

g. The permittee shall submit the results of the monthly catalytic incinerator inspections required under c)(3) that are completed during the reporting period.

h. The permittee shall submit the results of the annual catalyst activity test(s) required by c)(3) in the last quarterly report for each year, along with a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator required by c)(3).

If no deviations/excursions occurred during a calendar quarter, the report shall state that no deviations occurred during the reporting period.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(4)(c)]

(2) The permittee shall submit quarterly summaries of the following records:

a. any records of downtime (date and length of time) for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

b. a log of the operating time for the capture system, catalytic incinerator, monitoring equipment, and the emissions unit(s).

[Authority for term: OAC rule 3745-21-09(B)(4)(c)]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The reports required in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall submit semiannual reports and such other notifications and reports to the Toledo Division of Environmental Services and EPA Region 5 as are required pursuant to 40 CFR Part 63 Subpart SSSS, per the following sections:

| | |
|---|---|
| 63.5180(a) | Submit reports to EPA Region 5 and |

| | |
|---|---|
| | Toledo Division of Environmental Services |
| 63.5180(c) | Notification of Performance Test |
| 63.5180(e) | Performance Test Report |
| 63.5180(f) | Start-up shutdown and malfunction reports |
| 63.5180(g) | Semi-annual compliance reports |
| 63.5180(h) | Deviation reports if not using a CEMS |
| 63.5180(i) | Deviation reports if using a CEMS |

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions from coatings and cleanup materials shall not exceed 70 pounds per hour.

Applicable Compliance Method:

VOC from the coatings and cleanup materials:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC rule 3745-21-10(C). Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

100% capture efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 204 of 40 CFR Part 60, Appendix A and the methods and procedures of OAC rule 3745-21-10(C). Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

90% overall control efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform emission testing conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Method 204 of 40 CFR Part 51, Appendix M, and methods and procedures of OAC rule 3745-21-10(C). Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

182.1 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

CO emissions shall not exceed 1.9 pounds per hour

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5 mmBtu/hr, an emission factor of 84 pounds of CO per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This CO emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

8.3 tons per year CO

Applicable Compliance Method:

The annual emission limitation is based on the hourly CO emission rate for 8760 hours per year. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

NOx emissions shall not exceed 2.3 pounds per hour

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5 mmBtu/hr, an emission factor of 100 pounds of NOx per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This NOx emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

h. Emission Limitation:

10.07 tons per year NOx

Applicable Compliance Method:

The annual emission limitation is based on the hourly NOx emission rate for 8760 hours per year. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

i. Emission Limitation:

PE shall not exceed 0.04 pound per hour

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5 mmBtu/hr, an emission factor of 1.9 pounds of particulates per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot. This particulate emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

j. Emission Limitation:

0.18 ton per year PE

Applicable Compliance Method

The annual emission limitation is based on the hourly PE emission rate for 8760 hours per year. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

k. Emission Limitation:

SO2 emissions shall not exceed 0.01 pound per hour

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5 mmBtu/hr, an emission factor of 0.6 pound of SO2 per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This SO2 emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-18-04(E). Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

l. Emission Limitation:

0.04 ton per year SO2

Applicable Compliance Method:

The annual emission limitation is based on the hourly SO2 emission rate for 8760 hours per year. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

m. Emission Limitation:

20% opacity as a six minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved compliance methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

n. Emission Limitation:

98% overall control of organic HAP for each month during each 12-month compliance period

Applicable Compliance Method:

The monitoring and recordkeeping requirements of d)(6) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance according to 40 CFR 63.5160(d) and 63.5160(e).

[Authority for term: OAC rule 3745-77-07(C)(1)]

o. Emission Limitation:

0.046 kilogram of organic HAP per liter (0.38 lb/gal) of solids applied during each 12-month compliance period

Applicable Compliance Method:

The monitoring and recordkeeping requirements of d)(6) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation according to 40 CFR 63.5160.

[Authority for term: OAC rule 3745-77-07(C)(1)]

p. Emission Limitation:

100% capture efficiency and organic HAP emissions shall not exceed 20 parts per million by volume (ppmv) on a dry basis

The monitoring and recordkeeping requirements of d)(6) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance according to 40 CFR 63.5160(d) and 63.5160(e).

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitation and control efficiency limitation for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC: Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A. The sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Ohio EPA. The test method(s) which must be employed to compliance with the control efficiency limitation are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. The permittee shall record the temperature immediately upstream and downstream of the incinerator's catalyst bed, and the pressure differential between the inside and outside of the permanent total enclosure during each test run. The permittee shall determine the 3-hour average temperature immediately upstream of the catalyst bed, and the 3-hour average pressure differential between the inside and outside of the permanent total enclosure during each test run, and include the 3-hour average temperature and pressure differential values in the written test report. (If a SIP change is approved removing the recordkeeping and reporting requirement for temperature differential, then the requirement to measure the downstream temperature and incinerator temperature differential will become void upon approval of the SIP change by U.S. EPA.)

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental

Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.