State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/15/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-32-00-0023
Ball Metal Beverage Container Corporation
Tim D. Case
9300 West 108 Circle
Broomfield, CO 80021

Dear Tim D. Case:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **05/15/02**	Effective Date: **05/15/02**	Expiration Date: **05/15/07**

This document constitutes issuance of a Title V permit for Facility ID: 03-32-00-0023 to:
Ball Metal Beverage Container Corporation
12340 Township Road 99 East
Findlay, OH 45840

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Can Line 1) Aluminum Beverage Can Line 1. PTI submitted (7/99) for production speed up.	K002 (Can Line 2) Aluminum Beverage Can Line 2 K003 (Can Line 3)	Steel Food Can Line 3.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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 emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based

on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
   ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
   iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

   i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
   ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

   i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
   ii. Compliance certifications shall include the following:
      (a) An identification of each term or condition of this permit that is the basis of the certification.
      (b) The permittee's current compliance status.
      (c) Whether compliance was continuous or intermittent.
      (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

2. Records Retention Requirements
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.

3. Inspections and Information Requests
The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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 emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 (2 propane-fired boilers); B002 (3 propane-fired boilers); B003 (2 propane-fired boilers); L001 (cold cleaner 1); L002 (cold cleaner 2); L003 (cold cleaner 3); L004 (cold cleaner 4); L005 (cold cleaner 5); L006 (cold cleaner 6); L007 (cold cleaner 7); P001 (can washer ovens); P006 (solvent recovery system); P016 (end compound liner/conversion press AA); P017 (end compound line/conversion press TT); P018 (end compound liner/conversion press UU; P019 - end compound liner/conversion press VV); P020 (end compound liner/conversion press WW); P023 (end compound liner/conversion press NN); P024 (end compound liner/conversion press OO); P025 (end compound liner/conversion press PP); Z004 (cold cleaner 8); Z005 (cold cleaner 9); and Z006 [end compound liner/conversion press module 2 (21, 22, 23)].

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install (PTI) for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 1 (K001)

Activity Description: Aluminum Beverage Can Line 1. PTI submitted (7/99) for production speed up.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (can line #1), with dry filtration system	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	See A.I.2.a.
	OAC rule 3745-21-09(D)(1)(b)	2.8 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, from the overvarnish coating line (See A.I.2.g.)
	OAC rule 3745-21-09(D)(1)(c)	4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents, from the interior body coating line (See A.I.2.g.)
	40 CFR Part 60, Subpart WW	0.89 kilogram of VOC per liter of coating solids, from the two-piece inside spray coating operation (See A.I.2.b.) 0.46 kilogram of VOC per liter of coating solids, from the two-piece can overvarnish coating operation (See A.I.2.b.)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(A)(3) (PTI #03-13296)	43.31 lbs VOC/hr 0.33 lb PE/hr, 1.45 tons/yr PE Natural Gas Emissions: 1.78 lbs of nitrogen oxides (NOx)/hr, 7.80 tons/yr NOx 1.50 lbs of carbon monoxide (CO)/hr, 6.57 tons/yr CO 0.14 lb PE/hr, 0.61 tons/yr PE See A.I.2.c and d.
	OAC rule 3745-31-05(D) (PTI #03-13296)	162.63 tons of VOC per rolling, 365-day period (See A.I.2.e.)

2. Additional Terms and Conditions

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

2.b Pursuant to 40 CFR, 60.492, the permittee shall not discharge or cause the discharge of VOC emissions to the atmosphere that exceed the following monthly, volume-weighted average VOC content limitations:

i. 0.89 kilogram of VOC per liter of coating solids, from the two-piece can inside spray coating operation; an

ii. 0.46 kilogram of VOC per liter of coating solids, from the two-piece can overvarnish coating operation.

2.c The permittee shall employ best available technology (BAT) to control PE from this emissions unit. BAT has been determined to be the use of a baghouse that is capable of achieving a minimum control efficiency of 95%, by weight, for PE.

2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A), OAC rule 3745-21-09(D)(1)(b), OAC rule 3745-21-09(D)(1)(c), and 40 CFR, Part 60, Subpart WW.

2. Additional Terms and Conditions (continued)

2.e The permittee has requested the following federally enforceable limitation for purposes of avoiding PSD:

The annual VOC emissions resulting from the use of coatings, cleanup materials and natural gas combustion in this emissions unit shall not exceed 162.63 tons per rolling, 365-day period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI no. 03-13296, the permittee shall not exceed the VOC input rates specified in the following table:

Month	Maximum Allowable Cumulative Input Rates of VOCs (tons)
Month 1	35.00
Months 1-2	46.50
Months 1-3	58.00
Months 1-4	69.50
Months 1-5	81.00
Months 1-6	92.50
Months 1-7	104.00
Months 1-8	115.50
Months 1-9	127.00
Months 1-10	138.50
Months 1-11	150.00
Months 1-12	162.63

After the first 12 calendar months of operation following the issuance of PTI no. 03-13296, compliance with the annual VOC limitation shall be based upon a rolling, 365-day summation of the daily VOC emission rates.

2.f The hourly VOC limitation of 43.31 pounds was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting is necessary to ensure compliance with the emission limitation.

2.g Each coating employed in this emissions unit shall comply with the VOC content restrictions specified in A.I of the terms and conditions, on an "as applied" basis.

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a weekly basis for this emissions unit :

a. the name, type (i.e., overvarnish and interior body) and identification of each of coating and cleanup material employed;

b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;

c. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents, and in kilograms per liter of coating solids, as applied ;

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

e. the VOC emission rate from each coating and cleanup material employed, in pounds (b x d);

f. the total VOC emission rate from all the coatings and cleanup materials employed, in pounds (summation of e for all coatings and cleanup materials)

g. the actual amount of natural gas utilized or the maximum potential natural gas usage in the washer oven, deco ovens and IC oven, in millions of cubic feet;

h. the VOC emission rate resulting from natural gas combustion, in pounds [calculated by multiplying the emission factor of 5.5 lbs VOC/mmcu.ft (from AP-42, Section 1.4, Table 1.4-2, revised 7/98) by the natural gas usage rate [mm cu.ft], from section section 1.g above];

i. the total VOC emissions from all the coatings, cleanup materials and natural gas usage (f + h), in pounds;

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

k. the daily VOC emissions (i divided by j), in pounds (average); and

l. after the first 12 months of operation following the issuance of PTI no. 03-13296, the rolling, 365-day summation of the daily VOC emission rates, in tons.

2. In accordance with 40 CFR, 60.493(b), the permittee shall use the following procedures each calendar month to demonstrate compliance with the emission limitations specified in section A.I.2.b. The permittee shall determine the VOC content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24, 40 CFR, Part 60, Appendix A:

2.a Calculate the volume-weighted average for the total mass of VOC per volume of coating solids used during the month for each affected facility, except as provided under paragraph (b)(1)(iv) of 40 CFR 60.493. The volume-weighted average of the total mass of VOC per volume of coating solids used each calendar month shall be determined by the following procedures:

i. Calculate the mass of VOC used during the calendar month by using Equation (1) in 40 CFR 60.493(b)(1)(I)(A).

ii. Calculate the total volume of coating solids used in the calendar month by using Equation (2) in 40 CFR 60.493(b)(1)(I)(B).

iii. Calculate the volume-weighted average mass of VOC per volume of solids used during the calendar month by using Equation (3) in 40 CFR 60.493(b)(1)(I)(C).

iv. Calculate the volume-weighted average of VOC emissions discharged to the atmosphere during the calendar month by using Equation (4) in 40 CFR 60.493.(b)(1)(ii).

2.b If during a specific calendar month each individual coating used has a VOC content equal to or less than the limit specified in section A.I.2.b, the emissions unit is in compliance, provided no VOC solvents are added to the coating during distribution or application, and the permittee does not have to maintain the records required in A.III.2.a for that calendar month.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. For the first twelve calendar months of operation following the issuance of PTI no. 03-13296, the permittee shall record the cumulative VOC emissions, in tons, for each calendar month.

IV. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any weekly record and/or monthly record showing the use of coatings that did not comply with the VOC content limitations in section A.I.1 established pursuant to OAC rule 3745-21-09(D) [based upon the weekly records] and 40 CFR, Part 60, Subpart WW [based upon the monthly records]. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 162.63 tons, and for the first 12 calendar months of operation following the issuance of PTI no. 03-13296, all exceedances of the maximum allowable cumulative emission levels specified in section A.I.2.e. The quarterly devation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of the permit.

3. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

4. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with visible emissions limitation above pursuant to OAC rule 3745-17-03(B)(1).

1.b Emission Limitation: 2.8 pounds of VOC per gallon, excluding water and exempt solvents, from the overvarnish coating line

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of the terms and conditions of this permit.

1.c Emission Limitation: 4.2 pounds of VOC per gallon, excluding water and exempt solvents, from the interior body coating line

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of the terms and conditions of this permit.

1.d Emission Limitation: 0.89 kilogram of VOC per liter of coating solids, from the two-piece can inside spray coating operation

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

1.e Emission Limitation: 0.46 kilogram of VOC per liter of coating solids, from the two-piece can overvarnish coating operation

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.f Emission Limitation: 43.31 lbs VOC/hr

Applicable Compliance Method: The potential to emit for this emissions unit was determined based on a maximum line speed of 2600 cans per minute and the summation of the VOC emissions from the following components of the line:

i. IC Coating - 32.01 pounds of VOC per hour (based on a maximum VOC content of all the coatings of 0.97 pounds per gallon and a maximum coating usage rate of 32.76 gallons per hour).

ii. Overvarnish - 8.30 pounds of VOC per hour (based on a maximum VOC content of all the coatings of 0.91 pounds per gallon and a maximum coating usage rate of 9.12 gallons per hour).

iii. Inks - 2.31 pounds of VOC per hour (based on a maximum ink usage rate of 0.08 pound per 1000 cans and a maximum VOC weight percent of all inks used of 18.5%).

iv. Cleanup - 0.46 pound of VOC per hour (based on a maximum VOC content of 6.59 pounds per gallon and a maximum cleanup material usage rate of 0.068 gallon per hour).

v. Natural Gas Combustion - 0.10 pound of VOC per hour (based on a maximum heat input rate of 17.8 mmBtu/hr combined from all ovens and the emission factor from AP-42, Table 1.4-2 [revised 7/98] of 5.5 lbs VOC/mmcu.ft).

vi. Video Jet Emissions - 0.13 pound of VOC per hour (based on the ink usage rate of 0.007 gallon per hour with a VOC content of 5.79 pounds per gallon and a make-up solvent usage rate of 0.013 gallon per hour with a VOC content of 6.76 pounds per gallon)

1.g Emission Limitation: 0.33 lb PE/hr (from coating operation)

Applicable Compliance Method: Compliance with the hourly PE limitation may be demonstrated by utilizing the following equation:

E = (maximum coating solids usage rate, in pounds per hour) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed (assumed to be 87.5%)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly PE limitation in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

1.h Emission Limitation: 1.45 tons/yr PE (from coating operation)

Applicable Compliance Method: The annual emission limitation was determined by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

1.i Emission Limitation: 1.78 lbs NOx/hr (from natural gas combustion)

Applicable Compliance Method: The permittee may determine compliance with the hourly NOx emission limitation by multiplying the maximum natural gas usage rate (mm cu.ft/hr) by an AP-42 emission factor of 100 lbs NOx/mmcu.ft (AP-42, Section 1.4, Table 1.4-1 [revised 7/98]).

If required, the permittee shall demonstrate compliance with the hourly NOx limitation in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

1.j Emission Limitation: 7.80 tons/yr NOx (from natural gas combustion)

Applicable Compliance Method: The annual emission limitation was determined by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

1.k Emission Limitation: 1.50 lbs CO/hr (from natural gas combustion)

Applicable Compliance Method: The permittee may determine compliance with the hourly CO emission limitation by multiplying the maximum natural gas usage rate (mmcu.ft/hr) by an AP-42 emission factor of 84 lbs CO/mmcu.ft (AP-42, Section 1.4, Table 1.4-2 [revised 7/98]). If required, the permittee shall demonstrate compliance with the hourly CO emission limitation in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

1.l Emission Limitation: 6.57 tons/yr CO (from natural gas combustion)

Applicable Compliance Method: The annual emission limitation was determined by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

1.m Emission Limitation: 0.14 lb PE/hr (from natural gas combustion)

Applicable Compliance Method: The permittee may determine compliance with the hourly PE emission limitation by multiplying the maximum natural gas usage rate (mmcu.ft/hr) by an AP-42 emission factor of 7.6 lbs PE/mmcu.ft (AP-42, Section 1.4, Table 1.4-2 [revised 7/98]). If required, the permittee shall demonstrate compliance with the hourly PE emission limitation in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

1.n Emission Limitation: 0.61 ton/yr PE (from natural gas combustion)

Applicable Compliance Method: The annual emission limitation was determined by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

1.o Emission Limitation: 162.63 tons of VOC per rolling, 365-day period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of the terms and conditions of this permit.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (can line #1), with dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-Butoxyethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 0.68
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.40
MAGLC (ug/m3): 2301.43

Pollutant: Formaldehyde
TLV (mg/m3): 0.27
Maximum Hourly Emission Rate (lbs/hr): 0.224
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.087
MAGLC (ug/m3): 6.0

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 2 (K002)

Activity Description: Aluminum Beverage Can Line 2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage container manufacturing line (can line #2), with dry filtration system	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)(2)	none (See A.I.2.b.)
	40 CFR, Part 60, Subpart WW	for the interior body coating operation: 0.89 kilogram volatile organic compounds (VOC) per liter of coating solids for the exterior bottom end coating operation: 0.29 kilogram of VOC per liter of coating solids for the overvarnish coating operation: 0.46 kilogram of VOC per liter of coating solids
	OAC rule 3745-21-09(D)	for the interior body coating operation: 4.2 pounds of VOC per gallon coating, excluding water and exempt solvents for the basecoat coating operation: 2.8 pounds of VOC per gallon coating, excluding water and exempt solvents for the overvarnish coating operation: 2.8 pounds of VOC per gallon coating, excluding water and exempt solvents

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05 (PTI #03-10973)	40.72 lbs VOC/hr (including cleanup), 145.96 tons VOC/year (including cleanup materials) (See A.I.2.c.) 0.29 lb particulate emissions (PE)/hr, 1.27 tons PE/year Visible PE shall not exceed 0% opacity, as a 6-minute average. for the burning of natural gas: 2.12 lbs nitrogen oxides (NOx)/hr, 9.29 tons NOx/year 0.128 lb VOC/hr, 0.56 ton VOC/year The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart WW and OAC rule 3745-21-09(D).

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.

2.c The permittee shall employ (based upon the monthly VOC input rates) no more than 145.96 tons of VOC per rolling, 12-month period (including cleanup materials).

2.d The 40.72 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.e The 2.12 lbs NOx/hr and 0.128 lb VOC/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content restrictions specified in A.I of the terms and conditions, on an "as applied" basis.

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10973, issued on March 24, 1999: paragraphs 2 & 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

3. The permittee shall maintain monthly records that list the following information for this emissions unit:

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

b. the VOC content of each coating, in lbs/gallon of coating and in lbs/gallon of coating, excluding water and exempt solvents;

(Note: If the permittee mixes compliant coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.)

c. the type (i.e., interior body spray, exterior basecoat, overvarnish, and exterior bottom end) and VOC content of each coating (i.e, in kg/liter of coating solids, as applied);

d. the number of gallons of each coating employed;

e. the VOC emission rate from each coating employed (b x d), in pounds;

f. the VOC emission rate from all the coatings employed (summation of e for all coatings), in tons;

g. the VOC content of each cleanup material employed, in pounds per gallon;

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

i. the VOC emission rate from each cleanup material employed (g x h), in pounds;

j. the VOC emission rate from all the cleanup materials employed (summation of i for all cleanup materials), in tons;

k. the total VOC emission rate from all the coatings and cleanup materials employed (f + j), in tons; and

l. the rolling, 12-month summation of the monthly VOC emission rates for all the coatings and cleanup materials employed, in tons.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10973, issued on March 24, 1999: paragraphs 2 - 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 145.96 tons. The quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c. of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitations:
0.89 kilogram of VOC per liter of coating solids, as applied (for interior body spray coating)
0.29 kilogram of VOC per liter of coating solids, as applied (for exterior bottom end coating)
0.46 kilogram of VOC per liter of coating solids, as applied (for overvarnish spray coating)
4.2 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied (for interior body spray coating)
2.8 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied (for overvarnish spray coating)

Applicable Compliance Method: The permittee shall demonstrate compliance with the VOC content limitations above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.

1.b Emission Limitations: for the burning of natural gas: 0.128 lb VOC/hour, 0.56 ton VOC/year

Applicable Compliance Method: The permittee may determine compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 5.5 lbs VOC/mmcu.ft.

If required, the permittee shall demonstrate compliance with the hourly emission limitation pursuant to Method 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

1.c Emission Limitation: 40.72 lbs VOC/hour

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation as follows:

i. multiply the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all the coatings employed (lbs/gallon);

ii. multiply the maximum hourly cleanup material usage rate (gallons/hr) by the maximum VOC content of all the cleanup materials (lbs/gallon); and

iii. add 1.c.i + 1.c.ii.

If required, the permittee shall demonstrate compliance pursuant to Method 25 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

1.d Emission Limitations: 0.29 lb PE/hour and 1.27 tons PE/year (from coating usage)

Applicable Compliance Method: To determine the actual worst case PE rate (E), the following equation may be used for the paint spraying operation:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 80%)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly emission limit in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

1.e Emission Limitation: Visible emissions shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method: The permittee shall demonstrate compliance with the limitation above pursuant to 40 CFR, Part 60, Appendix A, Method 9.

1.f Emission Limitation: 145.96 tons VOC/rolling, 12-month period

Applicable Compliance Method: Compliance with the limitation above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

1.g Emission Limitations: for the burning of natural gas: 2.12 lbs NOx/hr, 9.29 tons NOx/year

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NOx/mmcu.ft.

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation pursuant to Methods 1 through 5 and 7 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage container manufacturing line	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit K002 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol
TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.53
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 190.30
MAGLC (ug/m3): 23,404.76

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

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

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

III. Monitoring and/or Record Keeping Requirements (continued)

2.c physical changes to the emissions unit or its exhaust parameters (e.g. increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s), is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

3.a a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

3.b documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

3.c where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 3 (K003)

Activity Description: Steel Food Can Line 3.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece steel food can manufacturing line (can line #3), with dry filtration system	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	See A.I.2.a.
	OAC rule 3745-21-09(D)	for the interior body coating operation: 4.2 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05 (PTI #03-10642)	63.1 lbs VOC/hr (including cleanup) 196.16 tons VOC/year (including cleanup) (See A.I.2.b.) 1.06 lbs PE/hr for the burning of natural gas: 1.08 lbs nitrogen oxides (NOx)/hr 0.06 lb VOC/hr See A.I.2.c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(D) and 3745-17-07(A).
	40 CFR, Part 60, Subpart WW	exempt (See A.I.2.d.)

2. Additional Terms and Conditions

2.a The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions (continued)

2.b The VOC emissions (for all the coatings and cleanup materials) shall not exceed 196.16 tons of VOC per rolling, 12-month period.

2.c The permittee shall emply no more than 600 gallons of cleanup materials per rolling, 12-month period.

2.d This emissions unit is not subject to the requirements of 40 CFR, Part 60, Subpart WW because it is a steel food container manufacturing line.

2.e The 63.1 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.f The 1.08 lbs NOx/hr and 0.06 lb VOC/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content restriction specified in A.I of the terms and conditions, on an "as applied" basis.

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10642, issued on December 23, 1997: paragraphs 2 & 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain monthly records that list the following information for this emissions unit:

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

b. the VOC content of each coating, in lbs/gallon of coating and in lbs/gallon of coating, excluding water and exempt solvents;

(Note: If the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.)

c. the number of gallons of each coating employed;

d. the VOC emission rate from each coating employed (b x c), in pounds;

e. the VOC emission rate from all the coatings employed (summation of d for all coatings), in tons;

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

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

h. the VOC emission rate from each cleanup material employed (f x g), in pounds;

i. the VOC emission rate from all the cleanup materials employed (summation of h for all cleanup materials), in tons;

j. the total VOC emission rate from all the coatings and cleanup materials employed (e + i), in tons;

k. the rolling, 12-month summation of the monthly VOC emission rates from all the coatings and cleanup materials employed, in tons;

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

m. the rolling, 12-month summation of the monthly numbers of gallons of all the cleanup materials employed.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10642, issued on December 23, 1997: paragraphs 2 - 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

i. all exceedances of the rolling, 12-month VOC limitation of 196.16 tons; and

ii. all exceedances of the rolling, 12-month cleanup materials usage restriction of 600 gallons.

The quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to OAC rule 3745-17-03(B)(1).

1.b Emission Limitation: 4.2 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied

Applicable Compliance Method: The permittee shall demonstrate compliance with the VOC content limitation above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.

1.c Emission Limitation: for the burning of natural gas: 0.06 lb VOC/hour

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 5.5 lbs VOC/mmcu.ft.

If required, the permittee shall demonstrate compliance with the hourly emission limitation pursuant to Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.d Emission Limitation: 63.1 lbs VOC/hour

Applicable Compliance Method: The permittee may demonstrate compliance with this limitation as follows:

i. multiply the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all the coatings employed (lbs/gallon);

ii. multiply the maximum hourly cleanup material usage rate (gallons/hr) by the maximum VOC content of all the cleanup materials employed (lbs/gallon); and

iii. add 1.c.i + 1.c.ii.

If required, the permittee shall demonstrate compliance pursuant to Method 25 of 40 CFR, Part 60, Appendix A.

1.e Emission Limitation: 1.06 lbs PE/hr (from coating usage)

Applicable Compliance Method: To determine the actual worst case PE rate (E), the following equation may be used for the paint spraying operation:

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 80%)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the PE emission limitation above in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

1.f Emission Limitation: 196.16 tons VOC/rolling, 12-month period

Applicable Compliance Method: Compliance with the limitation above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

V. Testing Requirements (continued)

1.g Emission Limitation: for the burning of natural gas: 1.08 lbs NOx/hr

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NOx/mmcu.ft.

If required, the permittee shall demonstrate compliance with the NOx hourly emission limitation pursuant to Methods 1 through 5 and 7 of 40 CFR, Part 60, Appendix A.

1.h Usage Ristriction: 600 gallons/rolling, 12-month period (for cleanup material usage)

Applicable Compliance Method: Compliance with the limitation above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece steel food can manufacturing line (can line #3), with dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit K003 was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-butanol
TLV (mg/m3): 152
Maximum Hourly Emission Rate (lbs/hr): 63.1
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 855.1
MAGLC (ug/m3): 2,667.24

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

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

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

III. Monitoring and/or Record Keeping Requirements (continued)

2.c physical changes to the emissions unit or its exhaust parameters (e.g. increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s), is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

3.a a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

3.b documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

3.c where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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