Ohio Environmental Protection Agency

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

11/2/2010

Certified Mail

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

Tim Case
Ball Metal Beverage Container Corporation
9300 West 108 Circle
Broomfield, CO 80021

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0332000023
Permit Number: P0106443
Permit Type: OAC Chapter 3745-31 Modification
County: Hancock

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 Ohio EPA DAPC, Northwest District Office. 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
Ohio EPA-NWDO; Michigan; Indiana; Canada

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0332000023
Facility Name:	Ball Metal Beverage Container Corporation
Facility Description:	Metal Cans
Facility Address:	12340 Township Road 99 Findlay, OH 45840 Hancock County
Permit #:	P0106443, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Courier on 09/10/2010. The comment period ended on 10/10/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No public comments received.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Ball Metal Beverage Container Corporation

Facility ID:	0332000023
Permit Number:	P0106443
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	11/2/2010
Effective:	11/2/2010

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Ball Metal Beverage Container Corporation

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. K001, Can Line 1 14

Authorization

Facility ID: 0332000023
Facility Description: Metal Cans
Application Number(s): A0039497
Permit Number: P0106443
Permit Description: Modification to increase production capacity of aluminum beverage container manufacturing line (K001).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $200.00
Issue Date: 11/2/2010
Effective Date: 11/2/2010

This document constitutes issuance to:

Ball Metal Beverage Container Corporation
12340 Township Road 99
Findlay, OH 45840

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

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

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

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: P0106443
Permit Description: Modification to increase production capacity of aluminum beverage container manufacturing line (K001).

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:	Can Line 1
Superseded Permit Number:	03-13296
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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

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

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

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

10. Applicability

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

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

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

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

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed 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 <u>obtained before</u> 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, Can Line 1

Operations, Property and/or Equipment Description:

Modification of an existing 2-Piece Aluminum Beverage Container Manufacturing Line (last modified under PTI #03-13296 issued on 09/18/07) to increase line speed.

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 operation(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 are identified below. 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), as effective 11/30/01	1.89 lbs of nitrogen oxides (NOx)/hour; 8.28 tons of NOx/year 1.59 lbs of carbon monoxide (CO)/hour; 6.96 tons of CO/year See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D)	184.43 tons of volatile organic compounds (VOC)/rolling, 52-week period (see b)(2)i.)
d.	ORC 3704.03(T)	See b)(2)d.
e.	OAC rule 3745-21-09(D)(1)(b)	2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an overvarnish coating line
f.	OAC rule 3745-21-09(D)(1)(c)	4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an interior body coating line
g.	OAC rule 3745-17-11(B)	See b)(2)e. and b)(2)h.
h.	OAC rule 3745-17-11(C)	See b)(2)g.
i.	OAC rule 3745-17-07(A)(1)	See b)(2)f. and b)(2)h.
j.	40 CFR Part 60 Subpart WW	0.46 kilogram of VOC per liter of coating solids from each two-piece can over-varnish coating operation 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		spray coating operation
k.	40 CFR Part 63 Subpart KKKK	See 40 CFR Part 63.3490(b) Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period See b)(2)k.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirement under OAC rule 3745-31-05(A)(3), effective 11/30/01, has been determined to be the establishment of emission limitations in section b)(1)a.

It should be noted that NOx and CO emissions are generated as the products of combustion from the use of natural gas in multiple drying ovens utilized in the can manufacturing line. The use of natural gas in the drying ovens also results in emissions of VOC, sulfur dioxide (SO2), and particulate matter equal to or less than ten microns in diameter (PM10). The potential emissions for all products of combustion are based on a cumulative maximum heat input of 19.3 mmBtu (natural gas) and result in negligible emission quantities of SO2, VOC*, and PM10 and therefore have not been addressed through individual BAT limitations within this permit. It should be noted that the negligible emission quantities were included in the evaluation of the total emission increases that resulted from the proposed project.

*VOC emissions generated from the use of natural gas have been included in the synthetic minor emission limitation established under OAC rule 3745-31-05(D) [see b)(1)c.].

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements OAC rule 3745-31-05(A)(3), effective 11/30/01 will no longer apply.

c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the NOx and CO emissions from this air contaminant source since the potential to emit for NOx and CO is each less than 10 tons per year. Additionally the BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to SO2, VOC, and PM10 emissions associated with natural gas combustion from this emissions unit since the uncontrolled potential to emit for each pollutant is less than 10 tons per year.

Potential emissions for all products of combustion were determined by applying the appropriate natural gas emission factors from AP-42, Table 3.2-3 (07/2000) to a cumulative maximum fuel heat input of 18.90 mmBtu/hr.

d. The BAT requirements under ORC 3704.03(T) have been determined to be the compliance with the rolling 52-week VOC limitation established under OAC rule 3745-31-05(D).

e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table 1 of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.

f. This emissions unit is exempt from the visible particulate emission 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.

g. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, recordkeeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

h. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

i. This permit establishes the following federally enforceable emission limitation for purposes of limiting the potential to emit (PTE) for VOC:

   i. Annual VOC emissions from emissions units K001 shall not exceed 184.43 tons per rolling 52-week period [see c)(1)].

The PTE is being restricted such that the emission increase for VOC allowed for in this permit action (P0106443) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 40 tons per year.

Rolling emission limitations for VOC were initially established in Permit to Install (PTI) #03-13296 issued on 01/15/02, and administratively modified on 09/18/07. Since rolling VOC emission records exist from these previously issued PTIs, it is

not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

j. The emissions limitations established under OAC rule 3745-31-05(A)(3) as effective November 30, 2001, represent the potential to emit of this emissions unit. Therefore, no monitoring, recordkeeping, and/or deviation reporting is necessary to ensure compliance.

k. The permittee shall comply with the emission limitation for this emissions unit by using one of the following compliance methods below:

40 CFR Part 63.3491(a) – compliant material option

40 CFR Part 63.3491(b) – emission rate without add-on controls option

c) Operational Restrictions

(1) The maximum rolling, 52-week quantity of VOC containing/emitting materials (coatings, varnishes, inks, cleanup materials, and use of natural gas) employed/utilized in emissions unit is limited by the following equation:

$$\sum_{M=1}^{52} \left\{ \left(\sum_{i=1}^{n} [(Vi)(Gi) + (Wi)(Pi)] \right) + (mmCF)(E) \right\} \div 2000 \text{ lbs/ton} \leq 184.43$$

where,

M = the increment of the rolling 12-month period;

Vi = VOC content in pounds per gallon of each material containing VOC (coatings, varnishes, and cleanup material) employed

Gi = gallons used of each material containing VOC (coatings, varnishes, and cleanup material) for the increment period M

Wi = VOC content in weight percent for each ink employed

Pi = pounds of each ink used for the increment period M

n = total number of unique materials containing VOC (coatings, varnishes, cleanup material, inks, etc) employed in this emissions unit.

mmCF = natural gas usage, in million cubic feet, for the increment period M

E = emission factor for VOC emissions from natural gas combustion in pounds per million cubic feet [AP-42, Table 1.4-2 (7/98)]

A rolling emission limitation for VOC was initially established in Permit to Install (PTI) #03-13296 issued on 01/15/02 (administratively modified on 09/18/07) and, as such, rolling emissions records exist. The applicant shall use the existing records to determine

compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating procedures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a weekly basis for emissions unit K001:

a. the name and identification of each VOC containing material (coating, varnish, cleanup material) employed;

the name and identification of each coating should contain information indicating whether the coating is use for overvarnish or internal body coating operations.

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

c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

d. the number of gallons of each VOC containing material employed;

e. the VOC emission rate for each VOC containing material, in tons per week [(b. times d.) divided by 2000];

f. the total VOC emission rate for VOC containing material, in tons per week (summation of e for all VOC containing materials employed);

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

h. the VOC emission rate resulting from natural gas combustion, in pounds per week [calculated based on weekly natural gas usage in (f) and appropriate emission factors from AP-42);

i. the total VOC emissions from the use of VOC containing materials and natural gas combustion, in tons, per week (summation of g and h);

j. the rolling, 52-month VOC emission rate, 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 b)(1)j. 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 of 40 CFR Part 60, Appendix A.

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 will 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 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).

b. If each individual coating has a VOC content equal to or less than the limit specified in section b)(1)j., the emissions unit is in compliance provided no VOC solvents are added to the coating during distribution or application. [40 CFR 60.493(b)(1)(iv)]

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Northwest District Office upon request.

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

In the absence of adequate manufacturer's recommendations, instructions, or operating manuals, the permittee shall develop its own guidance for inspections. The permittee shall maintain a copy of the recommended inspection frequency and have it available for Ohio EPA inspection upon request.

(5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Northwest District Office upon request.

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(8) The permittee shall comply with the applicable monitoring and recordkeeping requirements as per 40 CFR Part 63, Subpart KKKK, including the following sections:

a. A copy of each notification and report that you submitted to comply with this subpart and the documentation supporting each notification and report. [40 CFR 63.3512(a)]

b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating and thinner and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.3512(b)]

c. A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option. [40 CFR 63.3512(c)(1)]

d. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of 63.3521. [40 CFR 63.3512(c)(2)]

e. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings and thinners used

each month, using Equations 1, 1A through 1C, and 2 of 63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 63.3531(e)(3); the calculation of the total volume of coating solids used each month, using Equation 2 of 63.3531; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 63.3531. [40 CFR 63.3512(c)(3)]

f. A record of the name and volume of each coating and thinner used during each compliance period. [40 CFR 63.3512(d)]

g. A record of the mass fraction of organic HAP for each coating and thinner used during each compliance period. [40 CFR 63.3512(e)]

h. A record of the volume fraction of coating solids for each coating used during each compliance period. [40 CFR 63.3512(f)]

i. A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner used during each compliance period. [40 CFR 63.3512(g)]

j. If you use an allowance in Equation 1 of 63.3531 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, or disposal facility (TSDF) according to 63.3531(e)(3) or otherwise managed in accordance with applicable Federal and State waste management regulations, you must keep the following records of the information specified in paragraphs (h)(1) through (3) of 40 CFR 63.3512:

   i. The name and address of each TSDF or other applicable waste management location to which you sent waste materials for which you use an allowance in Equation 1 of 63.3531, a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility and the date of each shipment. [40 CFR 63.3512(h)(1)]

   ii. Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of 63.3531. [40 CFR 63.3512(h)(2)]

   iii. The methodology used in accordance with 63.3531(e)(3) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF or other applicable waste management location each month and the methodology to determine the mass of organic HAP contained in these waste materials. That must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [40 CFR 63.3512(h)(3)]

k. You must keep records of the date, time, and duration of each deviation. [40 CFR 63.3512(i)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the Northwest District Office in writing of any record showing the use of noncomplying coatings and/or deviations of the emission limitations specified in section b)(1). 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 each calendar month.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 52-week emission limitation for VOC.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(4) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as required pursuant to 40 CFR Part 63, Subpart KKKK, per the following section:

40 CFR 63.3511(a) – semiannual compliance report

f) Testing Requirements

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

a. Emission Limitation
184.43 tons of VOC per rolling, 52-week period.

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in section d)(1) of the terms and conditions of this permit.

b. Emission Limitation
2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an overvarnish coating line

Applicable Compliance Method
Compliance shall be based upon the recordkeeping requirements specified in section d)(1) of the terms and conditions of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

c. Emission Limitation
0.46 kilogram of VOC per liter of coating solids from each two-piece can overvarnish coating operation

Applicable Compliance Method
Compliance shall be based upon the recordkeeping requirements specified in section d)(2) of these terms and conditions.

d. Emission Limitation
4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an interior body coating line

Applicable Compliance Method
Compliance shall be based upon the recordkeeping requirements specified in section d)(1) of the terms and conditions of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

e. Emission Limitation
0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray operation

Applicable Compliance Method
Compliance shall be based upon the recordkeeping requirements specified in section d)(2) of these terms and conditions.

f. Emission Limitation
1.89 lbs of NOx/hour; 8.28 tons of NOx/year

Applicable Compliance Method
The hourly and annual emission limitations represent the potential to emit for this emissions unit. The hourly emission limitation was determined by multiplying a cumulative maximum heat input of 19.30 mmBtu/hour by a conversion factor of 0.001 mmscf/mmBtu and an emission factor of 100 lbs of NOx/MMcf (AP-42, Table 1.4-1 [7/98]).

The annual emission limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the pound per hour limitation, compliance with the annual emission limitation shall also be demonstrated.

g. Emission Limitation
1.59 lbs of CO/hour; 6.96 tons of CO/year

Applicable Compliance Method
The hourly and annual emission limitations represent the potential to emit for this emissions unit. The hourly emission limitation was determined by multiplying the a cumulative maximum heat input of 19.30 mmBtu/hour by a conversion factor of 0.001 mmscf/mmBtu and an emission factor of 84 lbs of CO/MMcf (AP-42, Table 1.4-1 [7/98]).

The annual emission limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the pound per hour limitation, compliance with the annual emission limitation shall also be demonstrated.

h. Emission Limitation
Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period

Applicable Compliance Method
Compliance shall be demonstrated in accordance with 40 CFR Part 63.3522(a) through 63.3522(d) for the compliant material option, or 40 CFR Part 63.3532(a) through 63.3532(d) for the emission rate without add-on controls option.

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

g) Miscellaneous Requirements

(1) None