Facility ID: 0250110920 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Facility ID: 0250110920 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **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
can coating line 5 with thermal incinerator	OAC Rule 3745-31-05 (A)(3) PTI#: 02-14856	VOC: 85% overall reduction, and 2.4 lbs/hr and 10.5 tons/year (from coatings) VOC: 2.5 tons/year (from cleanup materials)
	OAC Rule 3745-21-09 (D)	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. **Additional Terms and Conditions**

   (a) The interior body spray booth, exterior basecoat applicator, overvarnish applicator and all bake ovens shall be vented to the thermal incinerator.
   The permittee shall maintain for this emissions unit an overall VOC removal efficiency which is at least 85% by weight and a control efficiency (i.e., destruction or removal efficiency) which is at least 90% by weight.

B. **Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day of operation of the emissions unit:

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

   c. The name and identification number of each coating employed.

   d. The amount of each coating used, "CT", in gallons.

   e. The VOC content of each coating, in pounds of VOC per gallon of coating applied (PVGC).

   f. The total number of hours the emissions unit was in operation (HPD).

   g. For each coating, the amount of VOC emitted, in pounds per hour, defined as "CVOC" and calculated as follows:

CVOC = [(CT) * (1/HPD) * (PVGC)] * (1 - DE)

where:
DE = destruction efficiency from the most recent performance test that demonstrated compliance.

h. The total amount of VOC emitted from all the coatings employed, in pounds per hour.

3. The permittee shall collect and record the following information each month for the cleanup materials employed in this emissions unit:

a. The name and identification number of each cleanup material employed.

b. The amount of each cleanup material used, "CM", which shall be equal to the amount of each fresh cleanup material required minus the amount of each used cleanup material recovered for disposal, in gallons.

c. The VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material used (PVGCM).

d. For each cleanup material, the amount of VOC emitted, in tons, defined as "CMVOC" and calculated as follows:

CMVOC = (CM) * (PVGCM)/2000

e. The total amount of VOC emitted from all the cleanup materials employed, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. (These reports do not waive any applicable reporting requirements of OAC Rule 3745-15-06.)

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly VOC emissions exceeded 2.4 lbs/hr, and the actual average hourly VOC emissions for each such day.

3. The permittee shall also submit annual reports that specify the total VOC emissions from the coatings and the total VOC emissions from the cleanup materials, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. The facility shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 30 days following start of full production capacity.

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

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the overall control efficiency limitations for VOC are specified below.

d. The test(s) shall be conducted under maximum production rates unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC Rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

2. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the appropriate Ohio EPA District Office or local air agency's refusal to accept the results of the emission tests.

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

4. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

5. Emissions Limitation:
2.5 tons per year of VOC from cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.3. The monthly estimates of VOC emissions from cleanup materials shall be summed to provide the annual emissions.

6. Emissions Limitation:
85% overall control of VOC

Applicable Compliance Method:
Compliance shall be determined according to OAC Rule 3745-21-10(C) and the emissions testing procedures required in Section E.1.

7. Emissions Limitation:
2.4 pounds VOC per hour

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2. and the emission testing requirements specified in Section E.1.

8. Emissions Limitation:
10.5 tons VOC per year

Applicable Compliance Method:
Provided that compliance with the hourly emissions limit is demonstrated, compliance with the annual limit (which is based on the hourly limit times 8760 hours/year) will be demonstrated.

9. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

F. **Miscellaneous Requirements**

1. Prior to coating cans which will be used to hold beverages (as defined in 40 CFR Part 60, Subpart WW), the permittee shall apply for an Ohio EPA Permit to Install.

2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.