Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

7/14/2011

John Munsch
Ball Metal Food Container Corporation
9300 W 108TH CIRCLE
Broomfield, CO 80021

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125041920
Permit Number: P0107984
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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 Josh Mandel," 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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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: Ohio EPA-CDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Ball Metal Food Container Corporation

Facility ID:	0125041920
Permit Number:	P0107984
Permit Type:	Renewal
Issued:	7/14/2011
Effective:	7/14/2011
Expiration:	8/26/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Ball Metal Food Container Corporation

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Authorization

Facility ID: 0125041920
Application Number(s): A0041695
Permit Number: P0107984
Permit Description: Renewal of FEPTIO for can coating lines 1-6.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 7/14/2011
Effective Date: 7/14/2011
Expiration Date: 8/26/2015
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Ball Metal Food Container Corporation
2690 Charter Street
Columbus, OH 43228

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107984
Permit Description: Renewal of FEPTIO for can coating lines 1-6.

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

Emissions Unit ID:	**K006**
Company Equipment ID:	Can Line 6
Superseded Permit Number:	P0106389
General Permit Category and Type:	Not Applicable

Group Name: Can Coating Lines 1-5

Emissions Unit ID:	**K001**
Company Equipment ID:	Can Line 1
Superseded Permit Number:	P0083066
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Can Line 2
Superseded Permit Number:	P0083066
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Can Line 3
Superseded Permit Number:	P0083066
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Can Line 4
Superseded Permit Number:	P0083066
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Can Line 5
Superseded Permit Number:	P0083066
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. 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).

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K006, Can Line 6

Operations, Property and/or Equipment Description:

Can Line 6

a) 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.

b. b)(1)b, b)(2)b & c, d (1), (3) & (4) and e(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from all coatings, thinners, and cleanup materials employed in emissions unit K006 shall not exceed 22.6 tons as a rolling, 12-month summation.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	VOC emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 99.0 tons as a rolling, 12-month summation. Combined hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 24.9 tons as a rolling, 12-month summation. See b)(2)a.-c. below

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V and MACT	Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 9.9 tons as a rolling 12-month summation.
c.	OAC rule 3745-17-11(B)(1)	Total allowable particulate emissions from the application of coating materials in this emissions unit shall not exceed 0.551 pound of particulate matter (PM) per hour. See b)(2)d.
d.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-21-09(D)(2)(d)	VOC content of coatings employed in this emission unit shall not exceed 5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. The VOC content of each thinner and clean up material, as applied, shall not exceed 7.6 pounds of VOC per gallon, minus water and exempt solvents.

b. The maximum annual coating usage for this emissions unit shall not exceed 8,181 gallons based upon a rolling, 12-month summation of the coating usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	1,000
1-2	2,000
1-3	3,000
1-4	4,000
1-5	5,000
1-6	6,000
1-7	7,000
1-8	8,181
1-9	8,181
1-10	8,181
1-11	8,181
1-12	8,181

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

c. The maximum annual thinner and cleanup material usage shall not exceed 110 gallons, based upon a rolling, 12-month summation of usage figures.

d. The hourly PE limitation established for this emissions unit is greater than the potential-to-emit for PE as vented to the fabric filter and in accordance with the information provided in the PTIO application. The recordkeeping and monitoring requirements that ensure PE from this emissions unit are captured and directed to the fabric filter are sufficient to ensure compliance with this limit.

c) Operational Restrictions

(1) The permittee shall operate the mesh pad filter for the overspray whenever the spray coating is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. the coating usage for each month; and

b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures.

(2) The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

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

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

(3) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in emissions units K001-K006:

a. the number of gallons of each coating applied <u>or</u> the number of gallons of all coatings applied during the month;

b. the maximum VOC content (excluding water and exempt solvents) of each coating applied; <u>or</u> the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for $C_{VOC,2}$ above;

c. the total VOC emissions from all coatings applied, i.e., the summation of the products of “a” times “b” for all the individual coatings applied during the month; <u>or</u> the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e.,“a” times “b” for worst case coating;

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

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

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

g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of “e” times “f” for all cleanup materials employed; and

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of “c” and “g”.

i. the total combined VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in “h” above, for the present month plus the previous 11 months of operation, in ton(s).

(4) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units K001-K006:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "d" above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

(5) The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) The permittee shall maintain daily records that document any time periods when the fabric filter was not in service during operation of this emissions unit.

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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation (22.6 tons);

ii. all exceedances of the rolling 12-month coating usage limitation (8,181 gallons)

iii. all exceedances of the rolling, 12-month thinner and cleanup material usage limitation (110 gallons)

iv. all exceedances of the rolling, 12-month individual HAP limitation (9.9) tons;

v. all exceedances of the rolling, 12-month total combined HAP emission limitation (24.9 tons); and

vi. all exceedances of the rolling, monthly limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels**.**

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(5) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d.(6) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

a. <u>Emissions Limitation:</u>

VOC emissions shall not exceed 22.6 tons as a rolling, 12-month summation

<u>Compliance Method</u>

Compliance with this VOC emission limitation shall be demonstrated through the records required in Section d)(1) above.

b. Emissions Limitation

VOC emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 99.0 tons as a rolling, 12-month summation.

Compliance Determination

Compliance with this VOC emission limitation shall be demonstrated through the records required in Section d)(4) above.

c. Emissions Limitation

Combined hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 24.9 tons as a rolling, 12-month summation.

Compliance Determination

Compliance with this HAP emission limitation shall be demonstrated through the records required in Section d)(5) above.

d. Emissions Limitation

Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 9.9 tons as a rolling, 12-month summation.

Compliance Determination

Compliance with this HAP emission limitation shall be demonstrated through the records required in Section d)(5) above.

e. Emissions Limitation

Total allowable particulate emissions from the application of coating materials in this emissions unit shall not exceed 0.551 pound of particulate matter (PM) per hour.

Compliance Determination

The potential to emit for this emissions unit is less than the limit established by OAC rule 3745-17-11. The potential to emit for emissions unit K006 is calculated as follows:

Application Rate(a) (gal/can)	**Line Speed(b)** (cans/min)	**Conversion(c)** (min/hr)	**VOC(d)**
0.000028	550	60	

Coating usage

a x b x c = 0.93 gal/hr

PM emissions = coating usage x weight of coating x % solids x transfer efficiency x control efficiency

PM emissions = 0.93gal/hr x 7.95 lb/gal x 0.317% solids x .06 x 0.1 = 0.0014lb/hr

f. Emissions Limitation

Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Compliance Determination

Compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emissions Limitation

VOC content of coatings employed in this emission unit shall not exceed 5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Compliance Determination

Compliance with this VOC content limitation shall be demonstrated through the records required in Section d)(3) above.

(2) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Can Coating Lines 1-5: K001, K002, K003, K004, K005,

EU ID	Operations, Property and/or Equipment Description
K001	Can Line 1
K002	Can Line 2
K003	Can Line 3
K004	Can Line 4
K005	Can Line 5

a) 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. b)(1)b., b)(2)g, h and I, d)(1), (3) and (4), and e)(3)

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)	See b)(2)a-e. below.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)	VOC emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 99.0 tons as a rolling, 12-month summation. Combined hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 24.9 tons as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 9.9 tons as a rolling 12-month summation. See b)(2)g, h and i. below.
c.	OAC rule 3745-17-11(B)(1)	Total allowable particulate emissions from the application of coating materials in each emissions unit shall not exceed 0.551 pound of particulate matter (PM) per hour. See b)(2)f.
d.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from any stack in emissions units K001-K006 shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-21-09(D)(2)(d)	VOC content of coatings employed in emissions units K001-K006 shall not exceed 5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. VOC emissions from all coating, thinners, and cleanup materials employed shall not exceed 15.75 tons as a rolling, 12-month summation from emissions unit K001.

b. VOC emissions from all coating, thinners, and cleanup materials employed shall not exceed 19.85 tons as a rolling, 12-month summation from emissions unit K002.

c. VOC emissions from all coating, thinners, and cleanup materials employed shall not exceed 19.85 tons as a rolling, 12-month summation from emissions unit K003.

d. VOC emissions from all coating, thinners, and cleanup materials employed shall not exceed 21.31 tons as a rolling, 12-month summation from emissions unit K004.

e. VOC emissions from all coating, thinners, and cleanup materials employed shall not exceed 21.31 tons as a rolling, 12-month summation from emissions unit K005.

f. The hourly PE limitation established for this emissions unit is greater than the potential-to-emit for PE in accordance with the information provided in the PTIO application. It is not necessary to maintain records to demonstrate compliance with this limitation.

g. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

i. The maximum amount of annual coating usage emissions units K001-K006 shall not exceed 35,100 gallons, based upon a rolling, 12-month summation of coating usage figures.

h. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the thinner and cleanup material usage, upon issuance of this permit. The maximum annual thinner and cleanup material usage in emissions units K001-K006 shall not exceed 660 gallons, based upon a rolling, 12-month summation of usage figures.

i. The VOC content of each thinner and clean up material, as applied, shall not exceed 8.2 pounds of VOC per gallon, minus water and exempt solvents in emissions units K001-K005.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each emissions unit:

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage figures.

(2) The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

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

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

(3) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in emissions units K001-K006:

a. the number of gallons of each coating applied <u>or</u> the number of gallons of all coatings applied during the month;

b. the maximum VOC content (excluding water and exempt solvents) of each coating applied; <u>or</u> the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for $C_{VOC,2}$ above;

c. the total VOC emissions from all coatings applied, i.e., the summation of the products of “a” times “b” for all the individual coatings applied during the month; <u>or</u> the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e.,“a” times “b” for worst case coating;

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

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

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

g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of “e” times “f” for all cleanup materials employed; and

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of “c” and “g”.

i. the total combined VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in “h” above, for the present month plus the previous 11 months of operation, in ton(s).

(4) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units K001-K006:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "d" above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

(5) The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation for each emissions inut;

ii. all exceedances of the rolling 12-month coating usage limitation for each emission unit;

iii. all exceedances of the rolling, 12-month thinner and cleanup material usage limitation (660 gallons);

iv. all exceedances of the rolling, 12-month individual HAP limitation (9.9) tons;

v. all exceedances of the rolling, 12-month total combined HAP emission limitation (24.9 tons); and

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(5) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d.(4) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

a. <u>Emissions Limitation:</u>

VOC emissions from emissions unit K001 shall not exceed 15.75 tons as a rolling, 12-month summation.
VOC emissions from emissions unit K002 shall not exceed 19.85 tons as a rolling, 12-month summation.
VOC emissions from emissions unit K003 shall not exceed 19.85 tons as a rolling, 12-month summation.
VOC emissions from emissions unit K004 shall not exceed 21.31 tons as a rolling, 12-month summation.
VOC emissions from emissions unit K005 shall not exceed 21.31 tons as a rolling, 12-month summation.

Compliance Method

Compliance with this VOC emission limitation shall be demonstrated through the records required in Section d)(4) above.

b. Emissions Limitation

VOC emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 99.0 tons as a rolling, 12-month summation.

Compliance Determination

Compliance with this VOC emission limitation shall be demonstrated through the records required in Section d)(4) above.

c. Emissions Limitation

Combined hazardous air pollutant (HAP) emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 24.9 tons as a rolling, 12-month summation.

Compliance Determination

Compliance with this HAP emission limitation shall be demonstrated through the records required in Section d)(5) above.

d. Emissions Limitation

Individual HAP emissions from all coatings, thinners, and cleanup materials employed in emissions units K001-K006 shall not exceed 9.9 tons as a rolling, 12-month summation.

Compliance Determination

Compliance with this HAP emission limitation shall be demonstrated through the records required in Section d)(5) above.

e. Emissions Limitation

Total allowable particulate emissions from the application of coating materials in each emissions unit shall not exceed 0.551 pound of particulate matter (PM) per hour.

Compliance Determination

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

f. Emissions Limitation

Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Compliance Determination

If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emissions Limitation

VOC content of coatings employed in this emission unit shall not exceed 5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Compliance Determination

Compliance with this VOC content limitation shall be demonstrated through the records required in Section d)(3) above.

(2) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) None.