Facility ID: 0278000201 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0278000201 Issuance type: Title V Preliminary Proposed Permit

Part II - Specific Facility Terms and Conditions

a **State and Federally Enforceable Section**

1. None

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Facility ID: 0278000201 Issuance type: Title V Preliminary Proposed Permit

b **State Only Enforceable Section**

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

B010- natural gas fired boiler
B011- natural gas fired boiler
B012- Hartzel natural gas fired space heater
B013- Hartzel natural gas fired space heater
B014- Hartzel natural gas fired space heater
B015- Hartzel natural gas fired space heater
K008- Grease Drum Side Seam Touch-up
K010- Berwick Drum Line
K011- Off line spray touch-up booth
P001- 5 Stage Bonderizer
P002- Acid Pickling Tank
P003-Hand Metalizing Gun
P004-Metalizing Gun Welder
P005-Metalizing Gun Welder
P006-Galvanized Sheet Grinders
P007-Shell Lubricator
P008-Peck Welder

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.
The following insignificant emissions units are located at this facility:

B010- natural gas fired boiler
B011- natural gas fired boiler
B012- Hartzel natural gas fired space heater
B013- Hartzel natural gas fired space heater
B014- Hartzel natural gas fired space heater
B015- Hartzel natural gas fired space heater
K008- Grease Drum Side Seam Touch-up
K010- Berwick Drum Line
K011- Off line spray touch-up booth
P001- 5 Stage Bonderizer
P002- Acid Pickling Tank
P003-Hand Metalizing Gun
P004-Metalizing Gun Welder
P005-Metalizing Gun Welder
P006-Galvanized Sheet Grinders
P007-Shell Lubricator
P008-Peck Welder

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.
The following insignificant emissions units are located at this facility:

B010- natural gas fired boiler
B011- natural gas fired boiler
B012- Hartzel natural gas fired space heater

B013- Hartzel natural gas fired space heater
B014- Hartzel natural gas fired space heater
B015- Hartzel natural gas fired space heater
K008- Grease Drum Side Seam Touch-up
K010- Berwick Drum Line
K011- Off line spray touch-up booth
P001- 5 Stage Bonderizer
P002- Acid Pickling Tank
P003-Hand Metalizing Gun
P004-Metalizing Gun Welder
P005-Metalizing Gun Welder
P006-Galvanized Sheet Grinders
P007-Shell Lubricator
P008-Peck Welder

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.
The following insignificant emissions units are located at this facility:

B010- natural gas fired boiler
B011- natural gas fired boiler
B012- Hartzel natural gas fired space heater
B013- Hartzel natural gas fired space heater
B014- Hartzel natural gas fired space heater
B015- Hartzel natural gas fired space heater
K008- Grease Drum Side Seam Touch-up
K010- Berwick Drum Line
K011- Off line spray touch-up booth
P001- 5 Stage Bonderizer
P002- Acid Pickling Tank
P003-Hand Metalizing Gun
P004-Metalizing Gun Welder
P005-Metalizing Gun Welder
P006-Galvanized Sheet Grinders
P007-Shell Lubricator
P008-Peck Welder

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

2. The facility is hereby notified that this permit and all agency records covering the operation of these permitted emissions units are subject to public disclosure in accordance with OAC Rule 3745-49-03.
The facility is hereby notified that this permit and all agency records covering the operation of these permitted emissions units are subject to public disclosure in accordance with OAC Rule 3745-49-03.
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000201 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Roller coating of cut sheets for quarter drum bodies, with bake oven.	OAC Rule 3745-21-09(U)(1)(e)	4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum
	OAC Rule 3745-21-09(U)(1)(f)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each day for the line:

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

b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily volume-weighted average VOC content of all interior coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

d. The daily volume-weighted average VOC content of all exterior coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office (NEDO) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to NEDO within 45 days after the

exceedance occurs.

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V. **Testing Requirements**

1. Compliance with the VOC emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

   1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000201 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Roller coating and lithograph of cut sheets for quarter drum bodies, with bake oven.	OAC Rule 3745-21-09(U)(1)(e)	4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum
	OAC Rule 3745-21-09(U)(1)(f)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each day for the line:

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

b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily volume-weighted average VOC content of all interior coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

d. The daily volume-weighted average VOC content of all exterior coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office (NEDO) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to NEDO within 45 days after the exceedance occurs.

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V. **Testing Requirements**

1. Compliance with the VOC emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000201 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Interior coating of heads and bottoms of drums. Exterior coating of open head parts. Bake oven.	OAC Rule 3745-21-09(U)(1)(e)	4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum
	OAC Rule 3745-21-09(U)(1)(f)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum
	OAC Rule 3745-17-11(B)(1)	PM: 1.72 lbs/hr
	OAC Rule 3745-17-07(A)(1)	Visible particulate matter emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. The permittee shall employ both a dry exhaust filtration system and a water wash filtration system while this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for the line:

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

b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily volume-weighted average VOC content of all interior coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

d. The daily volume-weighted average VOC content of all exterior coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office (NEDO) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to NEDO within 45 days after the exceedance occurs.

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V. **Testing Requirements**

1. Compliance with the VOC emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 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.

2. Emission Limitation:
   1.72 lbs particulate matter/hr

   Applicable Compliance Method:
   To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

   E = particulate matter emissions rate (lbs/hr)

   TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

   CE = control efficiency of the control equipment

3. Emission Limitation:
   20% opacity

   Applicable Compliance Method:
   U.S.EPA reference method 9, if required by the Ohio EPA

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000201 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Interior coating of drums, first coat, with pre-dry oven.	OAC Rule 3745-21-09(U)(1)(e)	4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum
	OAC Rule 3745-17-11(B)(1)	PM: 0.63 lb/hr
	OAC Rule 3745-17-07(A)(1)	Visible particulate matter emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. The permittee shall employ a dry exhaust filtration system while this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for the line:

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

b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office (NEDO) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to NEDO within 45 days after the exceedance occurs.

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V. **Testing Requirements**

1. Compliance with the VOC emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 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.

2. Emission Limitation:
0.63 lb particulate matter/hr

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

3. Emission Limitation:
20% opacity as a 6 minute average

Applicable Compliance Method:
U.S. EPA reference method 9, if required by the Ohio EPA

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Interior coating of drums, second coat, with bake oven.	OAC Rule 3745-21-09(U)(1)(e)	4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum
	OAC Rule 3745-17-11(B)(1)	PM: 0.63 lb/hr
	OAC Rule 3745-17-07(A)(1)	Visible particulate matter emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. The permittee shall employ a dry exhaust filtration system while this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for the line:

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

b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office (NEDO) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to NEDO within 45 days after the exceedance occurs.

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V. **Testing Requirements**

1. Compliance with the VOC emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 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.

2. Emission Limitation:
0.63 lb particulate matter/hr

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

3. Emission Limitation:
20% opacity as a 6 minute average

Applicable Compliance Method:
U.S. EPA reference method 9, if required by the Ohio EPA

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Exterior drum coating line with bake oven, chime booth and silk screen.	OAC Rule 3745-21-09(U)(1)(f)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum
	OAC Rule 3745-17-11(B)(1)	PM: 2.1 lbs/hr
	OAC Rule 3745-17-07(A)(1)	Visible particulate matter emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. The permittee shall employ a dry exhaust filtration system while this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for the line:

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

b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office (NEDO) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to NEDO within 45 days after the exceedance occurs.

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V. **Testing Requirements**

1. Compliance with the VOC emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 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.

2. Emission Limitation:
   2.1 lbs particulate matter/hr

   Applicable Compliance Method:
   To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

   E = particulate matter emissions rate (lbs/hr)

   TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

   CE = control efficiency of the control equipment

3. Emission Limitation:
   20% opacity as a 6 minute average

   Applicable Compliance Method:
   U.S. EPA reference method 9, if required by the Ohio EPA

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000201 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

   1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None