



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

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

Mailing Address:

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

06/11/08

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77  
permit**

03-35-01-0053  
Silgan Can Company  
Phillip Cesen  
12-733 St Route 110  
Suite 101  
Napoleon, OH 43545

Dear Phillip Cesen:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. 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 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 Northwest District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northwest District Office  
File, DAPC PIER



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 06/11/08

Effective Date: 07/02/08

Expiration Date: 07/02/13

This document constitutes issuance of a Title V permit for Facility ID: 03-35-01-0053 to:

Silgan Can Company
12-733 St Route 110
Suite 101
Napoleon, OH 43545

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units K005 through K028 with their respective descriptions.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below.

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

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

Ohio Environmental Protection Agency

Chris Korleski (handwritten signature)

Chris Korleski
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Record Keeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

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

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

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

## 3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

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

**9. Reasonably Anticipated Operating Scenarios**

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

**10. Reopening for Cause**

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

**13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

**14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides

the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

**15. Emergencies**

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

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

**16. Off-Permit Changes**

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

**17. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

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

**19. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

**20. Air Pollution Nuisance**

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

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

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**2. Records Retention Requirements**

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

**3. Inspections and Information Requests**

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

**4. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**5. Permit Transfers**

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforceable Section**

1. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units K005, K006 and K010 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR Part 64)

### **B. State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

L001 - solvent cleaning tank;  
L002 - solvent cleaning tank;  
L003 - solvent cleaning tank;  
L004 - solvent cleaning tank;  
L005 - solvent cleaning tank;  
L006 - solvent cleaning tank;  
L007 - solvent cleaning tank;  
L008 - solvent cleaning tank;  
L010 - solvent cleaning tank;  
Z001 - enamel storage tank;  
Z002 - MP I/S storage tank;  
Z003 - MP washcoat storage tank;  
Z004 - end compound tank 1;  
Z005 - end compound tank 2;  
Z007 - videojet ink printers;  
Z010 - MP can bailer;  
Z011 - can bailer; and  
Z012 - UV line.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Coating Line 1 (K005)  
**Activity Description:** Sheet Coating Line 1 (Application and Oven)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sheet coating line #1, with thermal incinerator	OAC rule 3745-21-09(D)(2)(a)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	4.5 lbs volatile organic compounds (VOC)/gallon of coating solids  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.I.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.a.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

- i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28, combined (See A.II.2).
- ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28, combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{[V_i G_i \{1 - ((R_i) \times (K/100))\}]}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{[V_i G_i \{1 - ((R_i) \times (K/100))\}]}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information for each day for the coating line and control equipment:
  - a. The name and identification number of each coating employed.
  - b. The pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating.
  - c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings
  - d. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) the maximum VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
- the company identification of each coating and cleanup material employed;
  - the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - the number of gallons of each coating and cleanup material employed;
  - the emission rate for each individual HAP from each coating and cleanup material employed (A.III.3.b x A.III.3.c) for each individual HAP, in pounds;
  - the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of A.III.3.d for all coatings and cleanup materials), in pounds;
  - the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of A.III.3.e for all HAPs for all coatings and cleanup materials), in pounds;
  - for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

4. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

[40 CFR, Part 64.3(a), OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

5. The CAM plan for this emissions unit has been developed for volatile organic compounds. The CAM performance indicator for the regenerative thermal oxidizer controlling this emissions unit is the combustion temperature, which was established in accordance with the manufacturer's recommendations. When the combustion temperature shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

6. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(b)]

7. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(e)]

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation. 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 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.

b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.

c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).

d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-17111]

#### V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - 1.a The emissions testing shall be conducted by June 2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - 1.b The emission testing shall be conducted to determine the overall mass emission rate of 4.5 lbs VOC/gallon of coating solids.
  - 1.c The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for VOC are specified below.

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

- 1.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

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

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

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

3. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:

- 3.a Emission Limitation: 4.5 lbs VOC/gallon of coating solids

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit and also on the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of this permit.

- 3.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

- 3.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II.2)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III.2 of this permit.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sheet coating line #1, with thermal incinerator	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Coating Line 2 (K006)  
**Activity Description:** Sheet Coating Line 2 (Applicatoin and Oven)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sheet coating line #2, with thermal incinerator	OAC rule 3745-21-09(D)(2)(a)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	4.5 lbs volatile organic compounds (VOC)/gallon of coating solids  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.I.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.a.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

- i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28, combined (See A.II.2).
- ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28, combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{[V_i G_i \{1 - ((R_i) \times (K/100))\}]}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{[V_i G_i \{1 - ((R_i) \times (K/100))\}]}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information for each day for the coating line and control equipment:
  - a. The name and identification number of each coating employed.
  - b. The pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating.
  - c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings
  - d. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) the maximum VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
- the company identification of each coating and cleanup material employed;
  - the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - the number of gallons of each coating and cleanup material employed;
  - the emission rate for each individual HAP from each coating and cleanup material employed (A.III.3.b x A.III.3.c) for each individual HAP, in pounds;
  - the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of A.III.3.d for all coatings and cleanup materials), in pounds;
  - the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of A.III.3.e for all HAPs for all coatings and cleanup materials), in pounds;
  - for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

4. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

[40 CFR, Part 64.3(a), OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

5. The CAM plan for this emissions unit has been developed for volatile organic compounds. The CAM performance indicator for the regenerative thermal oxidizer controlling this emissions unit is the combustion temperature, which was established in accordance with the manufacturer's recommendations. When the combustion temperature shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

6. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(b)]

7. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(e)]

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation. 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 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

- a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
- c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
- d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-17111]

#### V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - 1.a The emissions testing shall be conducted by June 2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - 1.b The emission testing shall be conducted to determine the overall mass emission rate of 4.5 lbs VOC/gallon of coating solids.
  - 1.c The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for VOC are specified below.

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

- 1.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

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

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

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

3. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:

**3.a** Emission Limitation: 4.5 lbs VOC/gallon of coating solids

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit and also on the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of this permit.

**3.b** Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

**3.c** Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II.2)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III.2 of this permit.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sheet coating line #2, with thermal incinerator	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Welded Line (K008)  
**Activity Description:** Welded Line V8

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line V8	OAC rule 3745-21-09(D)(2)(d)	5.5 lbs volatile organic compounds (VOC) gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.55 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) [PTI #03-17111, issued 10/17/06]	The requirements established pursuant to this rule in PTI 03-2521 are equivalent to the requirements of OAC rules 3745-21-09(D)(2)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.I.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period. (See A.I.2.a.i.)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

## II. Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

**II. Operational Restrictions (continued)**

2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

3. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a the name and identification number of each coating employed; and
  - b the VOC content of each coating employed (in lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

4. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:

- 1.a Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

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

- 1.b Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

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

$$E = \text{PE rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

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

If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10).

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

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

## **V. Testing Requirements (continued)**

- 1.d** Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.e** Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II.3)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III.3 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line V8	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Welded Line 2 (K009)  
**Activity Description:** Welded Line 2 (Application and Oven)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line V8	OAC rule 3745-21-09(D)(2)(d)	5.5 lbs volatile organic compounds (VOC) gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.55 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) [PTI #03-17111, issued 10/17/06]	The requirements established pursuant to this rule in PTI 03-2521 are equivalent to the requirements of OAC rules 3745-21-09(D)(2)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.I.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period. (See A.I.2.a.i.)

**2. Additional Terms and Conditions**

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

- i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
- ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

**II. Operational Restrictions (continued)**

2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{[V_i G_i \{1 - ((R_i) \times (K/100))\}]}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

3. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{[V_i G_i \{1 - ((R_i) \times (K/100))\}]}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a the name and identification number of each coating employed; and
  - b the VOC content of each coating employed (in lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

4. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:

- 1.a Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

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

- 1.b Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

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

$$E = \text{PE rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

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

If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10).

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

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

## **V. Testing Requirements (continued)**

- 1.d** Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.e** Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II.3)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III.3 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line V8	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** D&I Line (K010)  
**Activity Description:** Drawn & Ironed 2-Piece Food Can Line

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
drawn and ironed 2-piece food can line (Main Plant), with thermal oxidizer	OAC rule 3745-31-05(A)(3) [PTI #03-17111, issued 10/17/06]	223.92 lbs volatile organic compounds (VOC)/day (including cleanup materials)  1.74 lbs nitrogen oxides (NOx)/hr  See A.II.1.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(D)(1)(b)&(c), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-21-09(D)(1)(b)	4.5 lbs VOC/gallon of coating solids (for overvarnish coatings)
	OAC rule 3745-21-09(D)(1)(c)	9.8 lbs VOC/gallon of coating solids (for interior body coatings)
	OAC rule 3745-17-11(B)	0.98 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
		The requirements of this rule were established in PTI 03-6720.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C)	<p>9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.I.2.b.ii.)</p> <p>The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)</p>

**2. Additional Terms and Conditions**

- 2.a** The permittee shall operate a thermal oxidizer that has capture and destruction efficiencies for VOC sufficient to comply with the emission limitations above.
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
  - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.3).
  - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum annual number of hours of operation for this emissions unit shall not exceed 8,400 hours, based upon a rolling, 365-day summation of the daily numbers of operating hours.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i \{1 - ((R_i) \times (K/100))\}] \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

3. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{Month=1}^M \sum_{i=1}^n [V_i G_i \{1 - ((R_i) \times (K/100))\}] \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.3(a) and PTI #03-17111]

2. The permittee shall record and maintain each day the following information for this emissions unit:
  - a. the number of hours the emissions unit was in operation; and
  - b. the rolling, 365-day summation of the daily numbers of hours in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following information each day for the overvarnish coating operation associated with this emissions unit:
- a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
  - e. the uncontrolled amount of VOCs emitted from each coating employed (this is calculated, for each coating, by multiplying the lbs of VOC/gallon of solids by the volume solids content, and then multiplying by the number of gallons of each coating), in pounds;
  - f. the uncontrolled amount of VOC emitted from all the coatings employed (summation of 2.e for all coatings), in pounds; and
  - g. the calculated, controlled VOC emissions, in tons [ $3.f \times (1 - \text{the overall control efficiency of the thermal oxidizer as determined during the most recent compliance test that demonstrated the emissions unit was in compliance}) \div 2000$ ].

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

4. The permittee shall collect and record the following information each day for the interior body coating operation associated with this emissions unit:
- the name and identification number of each coating, as applied;
  - the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
  - the uncontrolled amount of VOCs emitted from each coating employed (this is calculated, for each coating, by multiplying the lbs of VOC/gallon of solids by the volume solids content, and then multiplying by the number of gallons of each coating), in pounds;
  - the uncontrolled amount of VOC emitted from all the coatings employed (summation of 4.e for all coatings), in pounds; and
  - the calculated, controlled VOC emissions, in tons [4.f x (1 - the overall control efficiency of the thermal oxidizer as determined during the most recent compliance test that demonstrated the emissions unit was in compliance) divided by 2000].

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

5. The permittee shall collect and record the following information each day for the cleanup materials employed in this emissions unit:
- The name and identification number for each cleanup material employed.
  - The volume, in gallons, of each cleanup material employed.
  - The VOC content, in pounds/gallon, for each cleanup material employed.
  - The amount of VOC emitted from each cleanup material employed (5.b x 5.c), in pounds
  - The total amount of VOC emitted from all the cleanup materials employed (summation of d. for all cleanup materials), in pounds.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

6. The permittee shall calculate and record, each day, the total VOC emissions, in pounds, from all the coatings and cleanup materials employed. The total VOC emissions shall be calculated as follows:

total VOC emissions (lbs/day) = VOC emissions from section 3.g + VOC emissions from section 4.g + VOC emissions from section 5.e

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

7. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
- The name and identification number of each coating and cleanup material employed;
  - The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - the volume, in gallons, of each coating and cleaning material employed;
  - the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.7.b x A.III.7.c);
  - the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.7.b and A.III.7.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.7.d and A.III.7.e for all coatings and cleanup materials), in pounds or tons;
  - for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

8. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
- the company identification of each coating and cleanup material employed;
  - the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - the number of gallons of each coating and cleanup material employed;
  - the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

9. The CAM plan for this emissions unit has been developed for volatile organic compounds. The CAM performance indicator for the regenerative thermal oxidizer controlling this emissions unit is the combustion temperature, which was established in accordance with the manufacturer's recommendations. When the combustion temperature shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

10. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(b)]

11. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(e)]

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- All exceedances of the rolling, 365-day limitation of 8,400 hours of operation.
  - All exceedance of the daily VOC emission limitation of 223.92 pounds.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The rule shall notify the director of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitations. A copy of such record shall be sent to the director within forty-five days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.3.
  - All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.b.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
  - an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-17111]

#### V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emissions testing shall be conducted by June 2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - The emission testing shall be conducted to determine the overall control efficiency for VOC and the overall mass emission limitations of 4.5 lbs VOC VOC/gallon of overvarnish coating solids and 9.8 lbs VOC/gallon of interior body coating solids.

## V. Testing Requirements (continued)

- 1.c** The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for VOC are specified below.

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

- 1.d** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- 2.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

- 3.** Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:

- 3.a** Emission limitation: 223.92 lbs VOC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in A.III. 3, 4, 5 and 6 of this permit.

- 3.b** Emission Limitation: 9.8 lbs VOC/gallon of coating solids (for interior body coatings)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit and also on the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of this permit.

- 3.c** Emission Limitation: 4.5 lbs VOC/gallon of coating solids (for overvarnish coatings)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit and also on the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of this permit.

## V. Testing Requirements (continued)

### 3.d Emission Limitation: 1.74 lbs NO<sub>x</sub>/hour

Applicable Compliance Method: Compliance with the hourly limitation above may be determined by multiplying the maximum natural gas consumption rate (mm cu. ft/hr) by the AP-42, Table 1.4-1 (revised 1/95) emission factor of 100 lbs NO<sub>x</sub>/mm cu.ft. of natural gas.

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

### 3.e Emission Limitation: 0.98 lb PE/hr

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

$$E = \text{PE rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10).

### 3.f Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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

### 3.g Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section 2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.

### 3.h Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
drawn and ironed 2-piece food can line (Main Plant), with thermal oxidizer	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Welded Line 6 (K011)  
**Activity Description:** Welded Line 6 (Application and Oven)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #6	OAC rule 3745-31-05(A)(3) [PTI #03-17111, issued 10/17/06]	1,850 lbs volatile organic compounds (VOC)/month (including cleanup materials)  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(D)(2)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-21-09(D)(2)(d)	The requirements of this rule were established in PTI 03-6946. 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.b.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.1.2.b.i)

**2. Additional Terms and Conditions**

- 2.a** Each coating employed in this emissions unit shall comply with the VOC content in section A.I.1 on an "as applied" basis.
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
  - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
  - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

**II. Operational Restrictions (continued)**

2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

;

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

3. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed, as applied;
  - b. the VOC content of each coating employed (in lbs/gallon, excluding water and exempt solvents), as applied;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - d. the volume, in gallons, of each coating and cleanup material employed;
  - e. the amount of VOC emitted from each coating employed (1.c x 1.d), in pounds;
  - f. the amount of VOC emitted from each cleanup material employed (1.c x 1.d), in pounds; and
  - g. the amount of VOC emitted from all the coatings and cleanup materials employed [(summation of 1.e) for all coatings + (summation of 1.f) for all cleanup materials)], in pounds.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

4. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly VOC limitation of 1,850 pounds. All of the quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.2.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.b.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 1,850 lbs VOC/month  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.c Emission Limitation: 0.551 lb PE/hr  
  
Applicable Compliance Method: To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations.  
  
$$E = \text{PE rate (lbs/hr)}$$
$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1 - \text{TE}) \times (1 - \text{CE})$$
  
  
where:  
  
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  
  
If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10).
  - 1.d Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  
  
Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limit above pursuant to OAC rule 3745-17-03(B)(1).

## **V. Testing Requirements (continued)**

- 1.e** Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.

- 1.f** Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #6	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Welded Line 7 (K012)  
**Activity Description:** Welded Line 7 (Application and Oven)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #7	OAC rule 3745-31-05(A)(3) [PTI #03-17111, issued 10/17/06]	1,850 lbs volatile organic compounds (VOC)/month (including cleanup materials)  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(D)(2)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-21-09(D)(2)(d)	5.5 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.b.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.1.2.b.i)

**2. Additional Terms and Conditions**

- 2.a** Each coating employed in this emissions unit shall comply with the VOC content in section A.I.1 on an "as applied" basis.
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
  - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
  - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

**II. Operational Restrictions (continued)**

2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

M=1

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28;

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

3. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed, as applied;
  - b. the VOC content of each coating employed (in lbs/gallon, excluding water and exempt solvents), as applied;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - d. the volume, in gallons, of each coating and cleanup material employed;
  - e. the amount of VOC emitted from each coating employed (1.c x 1.d), in pounds;
  - f. the amount of VOC emitted from each cleanup material employed (1.c x 1.d), in pounds; and
  - g. the amount of VOC emitted from all the coatings and cleanup materials employed [(summation of 1.e) for all coatings + (summation of 1.f) for all cleanup materials)], in pounds.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

4. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly VOC limitation of 1,850 pounds. All of the quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.2.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.b.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28 , combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 1,850 lbs VOC/month  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.c Emission Limitation: 0.551 lb PE/hr  
  
Applicable Compliance Method: To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations.  
  
$$E = \text{PE rate (lbs/hr)}$$
$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$
  
  
where:  
  
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  
  
If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10).
  - 1.d Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  
  
Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limit above pursuant to OAC rule 3745-17-03(B)(1).

## **V. Testing Requirements (continued)**

- 1.e** Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.

- 1.f** Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #7	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Welded Line 4 (K013)  
**Activity Description:** Welded Line 4 (Application and Oven)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #4	OAC rule 3745-31-05(A)(3) [PTI #03-17111, issued 10/17/06]	The requirements established pursuant to this rule in PTI 03-2521 are equivalent to the requirements of OAC rules 3745-21-09(D)(2)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-21-09(D)(2)(d)	5.5 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.55 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provide by rule.
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.I.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period. (See A.I.2.a.i.)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

## II. Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

## II. Operational Restrictions (continued)

2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i}{M} \{1 - (R_i) \times (K/100)\} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

## III. Monitoring and/or Record Keeping Requirements

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

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

b. the VOC content of each coating employed (in lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-7707(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
- The name and identification number of each coating and cleanup material employed;
  - The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - the volume, in gallons, of each coating and cleaning material employed;
  - the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
  - the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;
  - for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

4. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
- the company identification of each coating and cleanup material employed;
  - the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - the number of gallons of each coating and cleanup material employed;
  - the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:

- 1.a Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

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

## V. Testing Requirements (continued)

### 1.b Emission Limitation: 0.551 lb PE/hr

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

$$E = \text{PE rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

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

If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10).

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

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

### 1.d Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.

### 1.e Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #4	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Welded Line 3 (K014)  
**Activity Description:** Welded Line 3 (Application and Oven)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #3	OAC rule 3745-31-05(A)(3) [PTI #03-17111, issued 10/17/06]	The requirements established pursuant to this rule in PTI 03-2521 are equivalent to the requirements of OAC rules 3745-21-09(D)(2)(d), 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-21-09(D)(2)(d)	5.5 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.55 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provide by rule.
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.I.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period. (See A.I.2.a.i.)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

## II. Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

## II. Operational Restrictions (continued)

2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i}{M} \{1 - ((R_i) \times (K/100))\} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28;

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

## III. Monitoring and/or Record Keeping Requirements

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

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

b. the VOC content of each coating employed (in lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-7707(C)(1) and PTI #03-17111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
- The name and identification number of each coating and cleanup material employed;
  - The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - the volume, in gallons, of each coating and cleaning material employed;
  - the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
  - the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;
  - for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

4. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
- the company identification of each coating and cleanup material employed;
  - the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - the number of gallons of each coating and cleanup material employed;
  - the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-171111]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-171111]

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-171111]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:

- 1.a Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

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

## V. Testing Requirements (continued)

### 1.b Emission Limitation: 0.551 lb PE/hr

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

$$E = \text{PE rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

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

If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10).

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

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

### 1.d Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.

### 1.e Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)

Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side seam coater - welded line #3	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 1 (K015)  
**Activity Description:** End Press 1 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #1	OAC rule 3745-21-09(D)(2)(e)	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.1.2.b.i)

**2. Additional Terms and Conditions**

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28;

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #1	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 2 (K016)  
**Activity Description:** End Press 2 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #2	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)

**2. Additional Terms and Conditions**

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28;

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #2	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 3 (K017)  
**Activity Description:** End Press 3 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #3	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

- i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
- ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #3	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 5 (K019)  
**Activity Description:** End Press 5 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #5	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)

**2. Additional Terms and Conditions**

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

2000 lbs/ton

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #5	none	none

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 6 (K020)  
**Activity Description:** End Press 6 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #6	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #6	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** End Press 7 (K021)  
**Activity Description:** End Press 7 (Application)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #7	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)

**2. Additional Terms and Conditions**

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

2000 lbs/ton

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #7	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 8 (K022)  
**Activity Description:** End Press 8 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #8	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)

**2. Additional Terms and Conditions**

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #8	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** End Press 9 (K023)  
**Activity Description:** End Press 9 (Application)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #9	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.I.2.b.i)

**2. Additional Terms and Conditions**

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #9	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 10 (K024)  
**Activity Description:** End Press 10 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #10	OAC rule 3745-21-09(D)(2)(e)	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.1.2.b.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000 \text{ lbs/ton} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \div 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #10	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** End Press 12 (K026)  
**Activity Description:** End Press 12 (Application)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #12	OAC rule 3745-21-09(D)(2)(e)	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.1.2.b.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

- i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
- ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #12	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** End Press 13 (K027)  
**Activity Description:** End Press 13 (Application)

#### A. State and Federally Enforceable Section

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #13	OAC rule 3745-21-09(D)(2)(e)  OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents  9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)  The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.1.2.b.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

2000 lbs/ton

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #13	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** End Press 14 (K028)  
**Activity Description:** End Press 14 (Application)

**A. State and Federally Enforceable Section**

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #14	OAC rule 3745-21-09(D)(2)(e)	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(C) [PTI #03-17111, issued 10/17/06]	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs [for emission units K005, K006, K008-17, K019-24, and K026-28 combined] (See A.2.a.ii.)
		The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28 combined shall not exceed 249.5 tons per rolling, 12-month period (See A.1.2.b.i)

## 2. Additional Terms and Conditions

**2.a** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:

i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPs
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**II. Operational Restrictions**

1. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

$$\sum_{i=1}^{12} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \geq 249.5$$

where,

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

n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28

V<sub>i</sub> = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G<sub>i</sub> = gallons used of each coating and cleanup material;

R<sub>i</sub> = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G<sub>i</sub>, R<sub>i</sub> equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G<sub>i</sub>;

K = % overall control efficiency of control employed as determined during the most recent performance test

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined shall not exceed the following:

Maximum Allowable Cumulative VOC Emission Rates (tons):

$$\sum_{i=1}^{\text{Month}} \frac{V_i G_i \{1 - ((R_i) \times (K/100))\}}{M} \leq 2000$$

is less than or equal to

1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating and cleanup material usage restriction shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17111]

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed (lbs/gallon, excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

2. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleaning material employed;
  - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.2.b x A.III.2.c);
  - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.2.b and A.III.2.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.2.d and A.III.2.e for all coatings and cleanup materials), in pounds or tons;
  - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
  - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

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

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
  - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
  - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

### IV. Reporting Requirements

1. 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 (i.e., for VOC content). 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
  - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17111]

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
  - 1.b Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs and the cumulative monthly HAP emissions (see section A.I.2.a)  
  
Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
  - 1.c Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period and the cumulative monthly VOC emissions (see section A.II)  
  
Applicable Compliance Method: Compliance with the rolling, 12-month and cumulative monthly VOC emission limitations above shall be determined through the record keeping requirements established in section A.III of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can end sealing liner - end press #14	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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