

1/11/2012

Certified Mail

Mr. Brian Cromie
REXAM Beverage Can Co
10444 Waterville
Whitehouse, OH 43571

Facility ID: 0448002007
Permit Number: P0088013
County: Lucas

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
TDES; Michigan; Indiana

PUBLIC NOTICE
1/11/2012 Issuance of Draft Air Pollution Title V Permit

REXAM Beverage Can Co
10444 Waterville Swanton Rd.,
Whitehouse, OH 43571
Lucas County
FACILITY DESC.: Metal Can Manufacturing
PERMIT #: P0088013
PERMIT TYPE: Renewal
PERMIT DESC: Renewal of Title V permit for can manufacturing facility

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Mary Lehman-Schmidt, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Title V Permit Statement of Basis
Permit Number: P0088013
Facility ID: 0448002007

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0448002007
Facility Name:	REXAM Beverage Can Co
Facility Description:	Metal beverage can manufacturing facility
Facility Address:	10444 Waterville Swanton Rd., Whitehouse, OH 43571
Permit #:	P0088013, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s)	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any [common control] issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



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Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	<p>Emission Units (EU) K001, K002, K003 were combined into EU K009 (PTI 04-01429 issued 11/29/2005) EU K004, K005, K006 were combined into EU K010 (PTI 04-01429 issued 11/29/2005) EU K007 and K008 were combined into EU K011 (PTI 04-01379 issued 1/20/2005) EU K012, a new can coating line, was added (04-01473 issued 8/27/2007) A federally enforceable, facility wide restriction of less than 10 TPY of any HAP and less than 25 TPY of any combination of HAPs to avoid major status. (04-01429 issued 11/29/2005) All the emissions for clean-up solvent, facility wide, were combined into the new EU K015 (PTI P0105177 issued 9/1/2009) EU B001, B002, B003 were permanently shut down on 11/17/2011</p>

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
HAPs from this facility, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.	31-05(D)		This facility wide federally-enforceable emission limitation is to avoid major HAP status. Therefore not subject to 40 CFR Part 63 Subpart KKKK or Subpart DDDDD. This limitation applies to all emission units: B001 – B003, K009 - K012, K015 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), or deminimis (OAC rule 3745-15-05).
Insignificant Emission Units	31-03(A)(1)		Two natural gas can washer ovens, (8) 6,000 gallon coating tanks, (3) 8,000 gallon petroleum storage tanks, (3) 1.68 mmBtu/hr natural gas boilers
NSPS Applicability		40 CFR Part 60 Subpart WW	Emission Units K010 – K012 are two-piece beverage can surface coating lines with an over varnish and inside spray coating operation subject to the emission limitations specified in this section. Emission Unit K009 was constructed prior to November 26, 1980 and therefore not subject.



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C. Emissions Unit Terms and Conditions

Key:															
EU = emissions unit ID								ENF = did noncompliance issues drive the monitoring requirements?							
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)								R = record keeping requirements							
OR = operational restriction								Rp = reporting requirements							
M = monitoring requirements								ET = emission testing requirements (not including compliance method terms)							
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement								Misc = miscellaneous requirements							
EU(s)	Limitation	Basis		ND	O	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K009	HAPs from this facility, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – this is a facility wide restriction to keep HAPs below major emissions level. M,R,Rp – monthly tracking of coating usage and USEPA Method 24 of 40 CFR Part 60, Appendix A to determine the HAP content will be used to demonstrate compliance with this limitation. A rolling, 12-month calculation of individual HAP and combined HAP emissions from all emission units at this facility will determine compliance. HAPs identified per Section 112(b) of Title III of the Clean Air Act. ET – Since emissions based on record keeping and reporting of material usage, emission testing not required.
	4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents) for	21-09(D)		N	Y	Y	N	N	Y	N	Y	N	N	N	M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-04(B)(5) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant



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	the Interior Body Coating.																							<p>coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>Streamlining – PTI states monthly recordkeeping maintained on the VOC content of all coatings employed in recordkeeping requirements but incorrectly states daily records maintained on the VOC content under testing requirements. This was corrected so testing requirements matched the recordkeeping requirements.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
	2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the ink and overvarnish	21-09(D)		N	Y	Y	N	N	Y	N	Y	N	N	N	N									<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-04(B)(5) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>Streamlining – PTI states monthly recordkeeping maintained on the VOC content of all coatings employed in recordkeeping requirements but incorrectly states daily records maintained on the VOC content under testing requirements. This was corrected so testing requirements matched the recordkeeping requirements.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility</p>



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	2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the continuous motion base coater.	21-09(D)		N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-04(B)(5) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>Streamlining – PTI states monthly recordkeeping maintained on the VOC content of all coatings employed in recordkeeping requirements but incorrectly states daily records maintained on the VOC content under testing requirements. This was corrected so testing requirements matched the recordkeeping requirements.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
		17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – Permittee shall have particulate control for inside spray and perform inspections of filter system as required by permit and maintain system per operating manual(s). Records kept of inspections and when control system is not operating when EU is operating.</p>
	VE shall not exceed 20% opacity of visible PE, as a 6-minute average.	17-07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>M,R,Rp – daily opacity checks on stack emissions shall demonstrate compliance. Any opacity incident shall be recorded along with any corrective action taken. If no opacity incident occurs during a calendar quarter, checks can go to weekly but back to daily if an incident occurs.</p>



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															ET - Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1) shall be used to determine compliance.
		18-06(A)		Y	N	N	N	N	N	N	N	N	N	N	ND – no emission limitations with natural gas as a fuel.
			40 CFR Part 60 Subpart WW	Y	N	N	N	N	N	N	N	N	N	N	ND – Not subject to this rule since this emission unit commenced operation on June 1, 1974, prior to the applicable date of November 26, 1980.
			40 CFR Part 63 Subpart KKKK	Y	N	N	N	N	N	N	N	N	N	N	ND – Not subject to this rule due to federally enforceable restriction to avoid major HAP status.
K010	HAPs from this facility, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR – this is a facility wide restriction to keep HAPs below major emissions level.</p> <p>M,R,Rp – monthly tracking of coating usage and USEPA Method 24 of 40 CFR Part 60, Appendix A to determine the HAP content will be used to demonstrate compliance with this limitation. The capture & destructive efficiency of the oxidizer will be taken into account. Efficiencies will be based on the last successful stack test which showed compliance (91.8% control efficiency and 99.4% destructive efficiency based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012). A rolling, 12-month calculation of emissions will determine compliance. HAPs identified per Section 112(b) of Title III of the Clean Air Act.</p>



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																<p>CAM – throughput restrictions restrict HAP emissions, prior to controls, below major status. Therefore, CAM is not applicable for HAP emissions.</p> <p>ET – Since emissions based on record keeping and reporting of material usage, emission testing not required.</p>
	50.21 tons of VOC per rolling, 12-month period from this emissions unit		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	<p>Basis – volunteered by facility to avoid PSD review.</p> <p>M,R,Rp – compliance was determined with a worst case operating scenario, based on the maximum coating usage determined by federally enforceable restrictions and use of oxidizer, therefore compliance shall be verified by monthly recordkeeping of the quantities of all coatings used and VOC content of each determined through USEPA Method 24 of 40 CFR Part 60, Appendix A. Record keeping of oxidizer performance shall also be tracked. To this was added the VOC emissions from the maximum combustion of fuel in the ovens for this emissions unit.</p> <p>ET – Since emissions based on record keeping and reporting of material usage emission testing not required. Stack testing for oxidizer efficiency will be performed every 5 years.</p> <p>CAM – Facility shall track oxidizer chamber temperature as an indicator of oxidizer performance. The temperature shall not go less than 50F below the average value recorded during the last stack test that showed compliance. The temperature shall</p>



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																be monitored continuously, recorded once per minute, and sound an alarm if below the average value recorded during the last stack test showing compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).
	14.04 pounds of VOC per hour.		ORC 3704.03(T)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>OR – compliance based on a worst case operating scenario and is determined by the maximum coating usage per hour and the maximum burn rate on ovens. Calculation used: Sum of [(Gallons of coating applied per hour)(weight % of solvent)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmscf)(1-CE)]/(1020 mmBtu/mmscf). CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance (91.8% control efficiency and 99.4% destructive efficiency based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).</p> <p>M,R,Rp –tracking of oxidizer temperature will verify performance. Stack testing will determine efficiency of oxidizer.</p> <p>ET – Since emissions based on maximum possible coating usage, emission testing not required. If necessary, compliance could be determined using Methods 1 through 4 and 25A of 40 CFR 60, Appendix A. Stack testing for oxidizer efficiency will be performed every 5 years.</p> <p>CAM – Facility shall track oxidizer chamber temperature as an indicator of oxidizer</p>



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																performance. The temperature shall not go less than 50F below the average value recorded during the last stack test that showed compliance. The temperature shall be monitored continuously, recorded once per minute, and sound an alarm if below the average value recorded during the last stack test showing compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).
			31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	N	N	N	N	BAT requirements do not apply to SO ₂ , NO _x , CO, PM ₁₀ , and PE emissions from this air contaminant source since the uncontrolled potential to emit are less than 10 tons per year. This rule applies once U.S. EPA approves this rule revision (S.B. 265) effective 8/3/2006 to the State Implementation Plan (SIP). Once this is approved, the BAT limits for these emissions (OAC rule 3745-31-05(A)(3)) effective 11/30/2001 will no longer apply.
	SO ₂ shall not exceed 0.01 pound per hour or 0.01 ton per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens (3.55 mmBtu/hr inside bake oven & 3.00 mmBtu/hr printer pin oven) using AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective



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															until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.
NO _x shall not exceed 0.64 pound per hour or 2.79 tons per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens (3.55 mmBtu/hr inside bake oven & 3.00 mmBtu/hr printer pin oven) using AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.
CO shall not exceed 0.54 pound per hour or 2.38 tons per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens (3.55 mmBtu/hr inside bake oven & 3.00 mmBtu/hr printer pin oven) using AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.



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	<p>PM₁₀ shall not exceed 0.33 pound per hour or 1.21 tons per year.</p>		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens plus the particulate emissions from the inside spray coating. Since the dryer oven emissions are based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. The particulate emissions from the inside spray is based on maximum throughput usage of coating. Permittee is required through work practice standards to maintain the particulate filter system for spray coatings, therefore the record keeping and reporting required for the work practice standards and coating usage will demonstrate compliance with the spray coating particulate emissions.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p> <p>ET – not required per EG#16, under 25 tpy.</p>
	<p>PE shall not exceed 0.29 pound per hour or 1.05 tons per year.</p>		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens plus the particulate emissions from the inside spray coating. Since the dryer oven emissions are based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. The particulate emissions from the inside spray is based on maximum throughput usage of coating. Permittee is required through work practice standards to maintain the particulate filter system for</p>



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																<p>spray coatings, therefore the record keeping and reporting required for the work practice standards and coating usage will demonstrate compliance with the spray coating particulate emissions.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p> <p>ET – not required per EG#16, under 25 tpy.</p>
Basecoat: 1.8 pounds of VOC per gallon of coating (minus water and exempt solvents) & 2.40 pound of VOC per gallon of coating solids.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>	
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.	17-07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>M,R,Rp – daily opacity checks on stack emissions shall demonstrate compliance. Any opacity incident shall be recorded along with any corrective action taken. If no opacity incident occurs during a calendar quarter, checks can go to weekly but back to daily if an incident occurs.</p> <p>ET - Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1) shall be used to determine compliance.</p>		



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over varnish and exterior bottom end varnish: 2.1 pounds of VOC per gallon of coating (excluding water and exempt solvents) and 2.9 pounds of VOC per gallon of coating solids.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance. ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.	
Inks: 1.81 pounds of VOC per gallon of coating (excluding water and exempt solvents).		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance. ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.	
interior body: 3.5 pounds of VOC per gallon of coating (excluding		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any	



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	water and exempt solvents) & 6.8 pounds of VOC per gallon of coating solids.														<p>coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
		17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – Permittee shall have particulate control for inside spray and perform inspections of system as required by permit and maintain system per operating manual(s) and sound engineering judgment. Records kept of inspections and when control system is not operating when EU is operating.</p>
	95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the continuous motion printer and inside body spray.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR – RTO reduces VOC emissions from inside spray oven and continuous motion printer oven. Control efficiency will be determined by the latest emissions test that demonstrated compliance. (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012)</p> <p>RTO shall only burn natural gas as fuel.</p> <p>M,R,Rp – facility shall operate a continuous temperature monitor for combustion temperature, recording temperature once a minute. Must report any temperature greater than 50 degree Fahrenheit below that shown during the latest compliance test showing compliance.</p> <p>ET – facility shall perform compliance testing for destructive efficiency of RTO once every 5 years within 6 months of Title V renewal in</p>



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															<p>accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A. Further capture efficiency testing shall only be required if there is a change in process.</p> <p>CAM - Facility will monitor temperature of combustion chamber in oxidizer constantly and recorded in one minute intervals. If the temperature drops below 50F under average temperature reported during last successful stack test showing compliance, it will initiate investigation to bring temperature back into compliance. Maintenance will be performed as outlined in O&M plan.</p>
		18-06(A)		Y	N	N	N	N	N	N	N	N	N	N	ND – no emission limitations with natural gas as a fuel.
			40 CFR Part 60 Subpart WW	N	Y	Y	N	N	Y	N	Y	N	N	N	ND – Coating emission limits in pounds of VOC per gallon coating solids. These emission limits are less stringent than the BAT limits.
			40 CFR Part 63 Subpart KKKK	Y	N	N	N	N	N	N	N	N	N	N	ND – Not subject to this rule due to federally enforceable restriction to avoid major HAP status.
K011	HAPs from this facility, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR – this is a federally enforceable facility wide restriction to keep HAPs below major emissions level.</p> <p>M,R,Rp – monthly tracking of coating usage and USEPA Method 24 of 40 CFR Part 60, Appendix A to determine the HAP content will be used to demonstrate compliance with this limitation. The capture & destructive efficiency of the oxidizer will be taken into</p>



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	of HAPs.														<p>account. Efficiencies will be based on the last successful stack test which showed compliance (91.8% control efficiency and 99.4% destructive efficiency based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012). A rolling, 12-month calculation of emissions will determine compliance. HAPs identified per Section 112(b) of Title III of the Clean Air Act.</p> <p>ET – Since emissions based on record keeping and reporting of material usage, emission testing not required.</p> <p>CAM – throughput restrictions restrict HAP emissions, prior to controls, below major status. Therefore, CAM is not applicable for HAP emissions.</p>
	VOC emissions shall not exceed 71.60 tons per rolling, 12-month period from this emissions unit.		31-05(D)	N	Y	Y	Y	N	Y	N	Y	N	N	N	<p>Basis – volunteered by facility to avoid PSD review.</p> <p>M,R,Rp – compliance was determined with a worst case operating scenario, based on the maximum usage determined by federally enforceable restrictions on coating usage and use of an oxidizer, therefore compliance shall be verified by monthly recordkeeping of the quantities of all coatings used and VOC content of each determined through USEPA Method 24 of 40 CFR Part 60, Appendix A. Record keeping of oxidizer performance shall also be tracked. To this was added the VOC emissions from the maximum combustion of fuel in the ovens for this emissions unit (5.2 mmBtu/hr inside bake oven & 2.75 mmBtu/hr printer pin oven).</p> <p>ET – Since emissions based on record</p>



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																<p>keeping and reporting of material usage emission testing not required. Stack testing for oxidizer efficiency will be performed every 5 years.</p> <p>CAM – Facility shall track oxidizer chamber temperature as an indicator of oxidizer performance. The temperature shall not go less than 50F below the average value recorded during the last stack test that showed compliance. The temperature shall be monitored continuously, recorded once per minute and sound an alarm if below the average value recorded during the last stack test showing compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).</p>
	VOC emissions shall not exceed 22.51 pounds per hour in this emissions unit.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	<p>OR – compliance based on a worst case operating scenario. It is based on maximum coating usage per hour and maximum burn rate on ovens and the operation of the oxidizer. Calculation used: Sum of [(Gallons of coating applied per hour)(weight % of solvent)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmscf)(1-CE))/(1020 mmBtu/mmscf)] CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance. CE=0 for all coatings, inks, and other materials except inside spray and inside spray oven.</p> <p>M,R,Rp – since emissions based on maximum coating usage, no recordkeeping or reporting required to track coating, but tracking of oxidizer temperature will verify oxidizer performance.</p>



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																<p>ET – Since emissions based on maximum possible coating usage and RTO control, emission testing not required. If needed, compliance could be determined using Methods 1 through 4 and 25A of 40 CFR 60, Appendix A. Stack testing for oxidizer efficiency will be performed every 5 years.</p> <p>CAM – Facility shall track oxidizer chamber temperature as an indicator of oxidizer performance. The temperature shall not go less than 50F below the average value recorded during the last stack test that showed compliance. The temperature shall be monitored continuously, recorded once per minute, and sound an alarm if below the average value recorded during the last stack test showing compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).</p>
		31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	N	N	N	N	N	<p>BAT requirements do not apply to SO₂, NO_x, CO, PM₁₀, and PE emissions from this air contaminant source since the uncontrolled potential to emit are less than 10 tons per year.</p> <p>This rule applies once U.S. EPA approves this rule revision (S.B. 265) effective 8/3/2006 to the State Implementation Plan (SIP). Once this is approved, the BAT limits for these emissions (OAC rule 3745-31-05(A)(3)) effective 11/30/2001 will no longer apply.</p>
SO ₂ shall not exceed 0.01 pound per hour or		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens (5.2 mmBtu/hr inside bake oven & 2.75</p>



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	0.02 ton per year.														<p>mmBtu/hr printer pin oven) using AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p> <p>ET – not required per EG#16, under 25 tpy.</p>
	NO _x shall not exceed 0.78 pound per hour or 3.41 tons per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p> <p>ET – not required per EG#16, under 25 tpy.</p>
	CO shall not exceed 0.66 pound per hour or 2.89 tons per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens (5.2 mmBtu/hr inside bake oven & 2.75 mmBtu/hr printer pin oven) using AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is</p>



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																used. This must be reported within 30 days. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.
	PM ₁₀ shall not exceed 0.34 pound per hour or 1.15 tons per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens plus the particulate emissions from the inside spray coating. Since the dryer oven emissions are based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. The particulate emissions from the inside spray is based on maximum throughput usage of coating. Permittee is required through work practice standards to maintain the particulate filter system for spray coatings, therefore the record keeping and reporting required for the work practice standards and coating usage will demonstrate compliance with the spray coating particulate emissions. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.
	PE shall not exceed 0.30 pound per hour or 0.94		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens plus the particulate emissions from the inside spray coating. Since the dryer oven



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	ton per year.															emissions are based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. The particulate emissions from the inside spray is based on maximum throughput usage of coating. Permittee is required through work practice standards to maintain the particulate filter system for spray coatings, therefore the record keeping and reporting required for the work practice standards and coating usage will demonstrate compliance with the spray coating particulate emissions. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.
	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.	17-07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	M,R,Rp – daily opacity checks on stack emissions shall demonstrate compliance. Any opacity incident shall be recorded along with any corrective action taken. If no opacity incident occurs during a calendar quarter, checks can go to weekly but back to daily if an incident occurs. ET - Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1) shall be used to determine compliance.	
		17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	M,R,Rp – Permittee shall have particulate control for inside spray and perform inspections of system as required by permit and maintain system per operating	



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																manual(s) and sound engineering judgment. Records kept of inspections and when control system is not operating when EU is operating.
	inks: 1.81 pounds of VOC per gallon of coating excluding water and exempt solvents		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N		<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
	over varnish: 2.1 pounds of VOC per gallon of coating, excluding water and exempt solvents & 2.9 pounds of VOC per gallon of coating solids.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N		<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
	bottom varnish (exterior bottom end coating): 2.1		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N		<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC</p>



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	pounds of VOC per gallon of coating excluding water and exempt solvents & 2.9 pounds of VOC per gallon of coating solids.														<p>content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
	inside spray: 3.5 pounds of VOC per gallon of coating excluding water and exempt solvents & 6.8 pounds of VOC per gallon of coating solids		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
	95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the continuous motion printer and		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR – RTO reduces VOC emissions from inside spray oven. Control efficiency will be determined by the latest emissions test that demonstrated compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).</p> <p>RTO shall only burn natural gas as fuel.</p> <p>M,R,Rp – facility shall operate a continuous temperature monitor for combustion temperature. Must report any temperature</p>



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	inside body spray.														<p>greater than 50 degree Fahrenheit below the average value recorded during the last stack test that showed compliance.</p> <p>ET – facility shall perform compliance testing for destructive efficiency of RTO once every 5 years within 6 months of Title V renewal in accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A. Capture efficiency shall only be required if there is a change in process.</p> <p>CAM – Facility shall track oxidizer chamber temperature as an indicator of oxidizer performance. The temperature shall not go less than 50F below the average value recorded during the last stack test that showed compliance. The temperature shall be monitored continuously, recorded once per minute, and sound an alarm if below the average value recorded during the last stack test showing compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).</p>
		18-06(A)		Y	N	N	N	N	N	N	N	N	N	N	ND – no emission limitations with natural gas as a fuel.
			40 CFR Part 60 Subpart WW	Y	N	N	N	N	N	N	N	N	N	N	ND – Coating emission limits in pounds of VOC per gallon coating solids. These emission limits are less stringent than the BAT limits.
			40 CFR Part 63 Subpart KKKK	Y	N	N	N	N	N	N	N	N	N	N	ND – Not subject to this rule due to federally enforceable restriction to avoid major HAP status.



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K012	HAPs from this facility, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR – this is a federally enforceable facility wide restriction to keep HAPs below major emissions level.</p> <p>M,R,Rp – monthly tracking of coating usage and USEPA Method 24 of 40 CFR Part 60, Appendix A to determine the HAP content will be used to demonstrate compliance with this limitation. The capture and destructive efficiency of the oxidizer will be taken into account. Efficiencies will be based on the last successful stack test which showed compliance (91.8% control efficiency and 99.4% destructive efficiency based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012). A rolling, 12-month calculation of emissions will determine compliance. HAPs identified per Section 112(b) of Title III of the Clean Air Act.</p> <p>CAM – throughput restrictions restrict HAP emissions, prior to controls, below major status. Therefore, CAM is not applicable for HAP emissions.</p> <p>ET – Since emissions based on record keeping and reporting of material usage, emission testing not required.</p>
	VOC emissions shall not exceed 41.32 tons per rolling, 12-month period.		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Basis – volunteered by facility to avoid PSD review.</p> <p>M,R,Rp – compliance was determined with a worst case operating scenario, based on the maximum usage determined by federally enforceable restrictions on coating usage and use of oxidizer, therefore compliance shall be verified by monthly recordkeeping of the quantities of all coatings used and VOC content of each determined through USEPA</p>



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															<p>Method 24 of 40 CFR Part 60, Appendix A. Record keeping of oxidizer performance shall also be tracked. To this was added the VOC emissions from the maximum combustion of fuel in the ovens for this emissions unit.</p> <p>ET – Since emissions based on record keeping and reporting of material usage emission testing not required. Stack testing for oxidizer efficiency will be tested every 5 years.</p> <p>CAM – Facility shall track oxidizer chamber temperature as an indicator of oxidizer performance. The temperature shall not go less than 50F below the average value recorded during the last stack test that showed compliance. The temperature shall be monitored continuously, recorded once per minute, and sound an alarm if below the average value recorded during the last stack test showing compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012).</p>
VOC emissions shall not exceed 12.38 pounds per hour.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR – compliance based on a worst case operating scenario or maximum coating usage per hour, maximum burn rate on ovens, and the operation of oxidizer. Calculation used: Sum of [(Gallons of coating applied per hour)(weight % of solvent)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmscf)(1-CE)]/(1020 mmBtu/mmscf) CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.</p>	



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															(SIP). Once this is approved, the BAT limits for these emissions (OAC rule 3745-31-05(A)(3)) effective 11/30/2001 will no longer apply.
SO ₂ shall not exceed 0.03 pound per hour or 0.12 ton per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p> <p>ET – not required per EG#16, under 25 tpy.</p>
NO _x shall not exceed 1.12 pounds per hour or 4.92 tons per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens. Since it is based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p> <p>ET – not required per EG#16, under 25 tpy.</p>
CO shall not exceed 0.95 pound per hour or 4.13 tons per		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens. Since it is based on potential to emit, there are no recordkeeping or reporting</p>



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year.																required, unless a fuel source other than natural gas is used. This must be reported within 30 days. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.
PM ₁₀ shall not exceed 0.28 pound per hour or 1.03 tons per year.		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer ovens plus the particulate emissions from the inside spray coating. Since the dryer oven emissions are based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. The particulate emissions from the inside spray is based on maximum throughput usage of coating. Permittee is required through work practice standards to maintain the particulate filter system for spray coatings, therefore the record keeping and reporting required for the work practice standards and coating usage will demonstrate compliance with the spray coating particulate emissions. This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA. ET – not required per EG#16, under 25 tpy.
PE shall not exceed 0.23		31-05(A)(3)	N	Y	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp – this emission limit is based on potential to emit for natural gas for the dryer



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	pound per hour or 0.78 ton per year.																<p>ovens plus the particulate emissions from the inside spray coating. Since the dryer oven emissions are based on potential to emit, there are no recordkeeping or reporting required, unless a fuel source other than natural gas is used. This must be reported within 30 days. The particulate emissions from the inside spray is based on maximum throughput usage of coating. Permittee is required through work practice standards to maintain the particulate filter system for spray coatings, therefore the record keeping and reporting required for the work practice standards and coating usage will demonstrate compliance with the spray coating particulate emissions.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p> <p>ET – not required per EG#16, under 25 tpy.</p>
	1.8 pounds of VOC per gallon of coating (minus water and exempt solvents) & 2.40 pound of VOC per gallon of coating solids for the base coat.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N	<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>	



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	VE shall not exceed 20% opacity of visible PE, as a 6-minute average.	17-07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>M,R,Rp – daily opacity checks on stack emissions shall demonstrate compliance. Any opacity incident shall be recorded along with any corrective action taken. If no opacity incident occurs during a calendar quarter, checks can go to weekly but back to daily if an incident occurs.</p> <p>ET - Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1) shall be used to determine compliance.</p>
	2.1 pounds of VOC per gallon of coating (excluding water and exempt solvents) & 2.9 pounds of VOC per gallon of coating solids for over varnish and exterior bottom end varnish.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
	1.81 pounds of VOC per gallon of coating (excluding water and exempt solvents) for inks.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p>



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																ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.
3.5 pounds of VOC per gallon of coating (excluding water and exempt solvents) & 6.8 pounds of VOC per gallon of coating solids for the interior body coating.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	N		<p>M,R,Rp – compliance shall be determined per OAC rule 3745-21-10(B) and 21-09(B)(3)(f) using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of coatings for this facility. Records shall be compiled on a monthly basis for any coatings received and any use of non-compliant coatings shall be reported within 30 days following the end of the calendar month of non-compliance.</p> <p>ET –USEPA Method 24 of 40 CFR Part 60, Appendix A will verify VOC content of coatings for this facility.</p>
	17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	N		<p>M,R,Rp – Permittee shall perform inspections of filter system as required by permit and maintain system per manufacturer’s recommendation and good engineering judgment. Records of inspections shall be kept and also records of when filter system is down when EU in operation.</p>
95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N		<p>OR – RTO reduces VOC emissions from inside spray oven, the base coater oven and the continuous motion printer oven. Control efficiency will be determined by the latest emissions test that demonstrated compliance.</p> <p>RTO shall only burn natural gas as fuel.</p> <p>M,R,Rp – facility shall operate a continuous</p>	



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Title V Permit Statement of Basis
Permit Number: P0088013
Facility ID: 0448002007

	continuous motion printer, base coat and inside body spray.														<p>temperature monitor for combustion temperature of RTO. Must report any temperature more than 50 degree Fahrenheit below that shown during the latest compliance test showing compliance. Shall maintain RTO according to O&M plan.</p> <p>ET – facility shall perform compliance testing for destructive efficiency of RTO once every 5 years within 6 months of Title V renewal in accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A. Capture efficiency shall only be required if there is a change in process.</p> <p>CAM – The temperature shall be monitored continuously, recorded once per minute, and sound an alarm if below the average value recorded during the last stack test showing compliance (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012) If the temperature drops below 50F under the average temperature reported during the last successful stack test showing compliance, it will initiate investigation to bring temperature back into compliance.</p>
		18-06(A)		Y	N	N	N	N	N	N	N	N	N	N	ND – no emission limitations with natural gas as a fuel.
			40 CFR Part 63 Subpart KKKK	Y	N	N	N	N	N	N	N	N	N	N	ND – Not subject to this rule due to federally enforceable restriction to avoid major HAP status.
			40 CFR Part 60 Subpart	Y	N	N	N	N	N	N	N	N	N	N	ND – Coating emission limits in pounds of VOC per gallon coating solids. These emission limits are less stringent than the



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			WW												BAT limits.
K015	<p>Volatile Organic Compound (VOC) emissions shall not exceed 6.55 tons per rolling, 12-month period.</p>		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – compliance was determined with a worst case operating scenario, based on a federally enforceable restriction on clean-up material of 2,000 gallons per rolling 12-month period. Compliance shall be verified by monthly recordkeeping of the quantities clean-up materials used and VOC content determined through USEPA Method 24 of 40 CFR Part 60, Appendix A.</p> <p>ET – Since emissions based on record keeping and reporting of material usage, emission testing not required.</p>
	<p>Clean-up solvent: 6.55 pounds of VOC per gallon.</p>		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – compliance shall be determined using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of clean-up material for this facility. Records shall be compiled on a monthly basis for clean-up material received.</p> <p>ET – Since emissions based on record keeping and reporting of material usage, emission testing not required.</p> <p>This BAT limit is based on BAT requirements pursuant to OAC rule 3745-31-05(A)(3) effective 11/30/2001. This will be effective until the rule revisions (S.B. 265) effective 8/3/2006 are accepted by the U.S. EPA.</p>
	<p>Clean-up solvent: 6.55 pounds of VOC per gallon.</p>		31-05(A)(3)(a)(ii)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>M,R,Rp – compliance shall be determined using USEPA Method 24 of 40 CFR Part 60, Appendix A to verify VOC content of clean-up material for this facility. Records shall be compiled on a monthly basis for clean-up</p>



DRAFT

**Division of Air Pollution Control
Title V Permit
for
REXAM Beverage Can Co**

Facility ID:	0448002007
Permit Number:	P0088013
Permit Type:	Renewal
Issued:	1/11/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
REXAM Beverage Can Co

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Authorization

Facility ID: 0448002007
Facility Description: Metal beverage can manufacturing facility
Application Number(s): A0019129, A0019130, A0019131, A0019132, A0037967
Permit Number: P0088013
Permit Description: Renewal of Title V permit for can manufacturing facility
Permit Type: Renewal
Issue Date: 1/11/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0088012

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

REXAM Beverage Can Co
10444 Waterville Swanton Rd.
Whitehouse, OH 43571

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Toledo Department of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(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:
- (1) 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 Standard Term and Condition A.2.c)(2) 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) 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))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions 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

Effective Date:To be entered upon final issuance

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 Standard 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 Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) 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 Standard Term and Condition A.2)c)(2) 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; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) 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 section B. Facility-Wide Terms and Conditions 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 Standard Term and Condition A.2.c)(2) 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))

- (4) 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))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Toledo Department of Environmental Services.

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

3. 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 Standard Term and Condition A.2.c)(1) above.

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

4. 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))

5. 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))

6. 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))

7. 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 Standard Term and Condition A.11 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.

- (1) 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 when: 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 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 a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. 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))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. 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))

12. 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))

13. 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:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (3) 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 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:
- (1) 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.
 - (2) 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.
 - (3) 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))

14. 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))

15. 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))

16. 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))

17. 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))

18. 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.)

19. 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))

20. 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))

21. 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))

22. 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)

23. 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))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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.)

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.

25. 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.

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

26. 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).

27. 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.

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

28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 Standard Term and Condition A.2.c)(2); 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.

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed as B.2.a)(1), (2), and (3) below, which are federally enforceable.
 - a) Facility-wide emissions shall not exceed 9.9 tons of individual hazardous air pollutant (HAP) emissions and 24.9 tons of total combined HAP emissions per rolling, 12-month period.
 - (1) Facility-wide emissions shall be determined from a summation of monthly emissions from the following emission units: B001 – B003, K009 – K012, K015, and all emissions units that are exempt, permit by rule (OAC rule 3745-31-03), or de minimis (OAC rule 3745-15-05). The emissions from the previous eleven months shall be added to this amount.
 - (2) Therefore, the provisions for Title V permitting, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Cans in 40 CFR Part 63 Subpart KKKK and for Industrial, Commercial and Institutional Boilers and Process Heaters in 40 CFR Part 63 Subpart DDDDD are not applicable.
 - (3) A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-31-05(D)]

3. The following insignificant emissions units are located at this facility that are enforceable under state law only:
 - B004 – Washer Oven (24 oz cans)
 - B005 – Washer Oven
 - B006 – Natural Gas Boiler 1.68 mmBtu/hr
 - B007 – Natural Gas Boiler 1.68 mmBtu/hr
 - B008 – Natural Gas Boiler 1.68 mmBtu/hr
 - T001 – Coater Tanks: (8) 6,000 gallon coating tanks
 - T002 – (3) 8,000 gallon petroleum storage tanks

[Authority for term: OAC rule 3745-77-07(A)(3)]

4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart WW: K010 – K012. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.

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5. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved compliance assurance monitoring plan for the emissions units K010, K011, and K012 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

C. Emissions Unit Terms and Conditions



1. K009, Can Manufacturing Line 1

Operations, Property and/or Equipment Description:

Production Line 1 with Continuous Motion Coater, Continuous Motion Printer (Deco, O/V, B/V), Interior Body Coating (Inside Body Sprayers), Coater Oven, Decoration Oven, Inside Bake Oven and other can making equipment for 24 oz. size cans.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-31-05(D) (PTI P0104669 issued on 5/18/2009)	See b)(2)a.
b.	OAC rule 3745-21-09(D)(1)	4.2 pounds VOC per gallon of coating (excluding water and exempt solvents) for the interior body and bottom varnish coatings. 2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the over varnish and basecoat coatings.
c.	OAC rule 3745-17-07(A)(1)	Visible emissions from stacks serving this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
d.	OAC rule 3745-17-11(C)	See b)(2)b.
e.	OAC rule 3745-18-06(A)	See b)(2)c.

(2) Additional Terms and Conditions

a. The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

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- b. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of this rule shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices (particulate filter system) and follow the work practice standards as stated in (C)(2) of this rule.
- c. OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as a fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The permittee shall operate the particulate filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the operating manual(s) and sound engineering judgment.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(1) and (2)(b)]

- (2) In the event the particulate filter system is not operating in accordance with the operating manual(s) or sound engineering judgment, the control device shall be expeditiously repaired or otherwise returned to documented operating conditions.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating (i.e. overvarnish, bottom varnish, or inside spray coating), as applied;
 - b. the VOC content of each coating, in pounds of VOC per gallon of coating;

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- c. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents;
- d. the number of gallons of each coating employed;
- e. the total VOC emissions (VOC applied) from all coatings [the summation of b. times d. divided by 2000 pounds per ton for each coating], in tons;
- f. the rolling 12-month summation of the gallons of each coating employed, calculated by adding the current month's summation (as recorded in e.) to the summation for the preceding eleven calendar months.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-09(D), and OAC rule 3745-31-05(D)]

- (2) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
 - a. the name and identification number/code of each coating, thinner, additive, and any other material containing any HAP;
 - b. the weight fraction of each individual HAP contained in each material applied (and identified in [a.] above) i.e., pound of each individual HAP per pound of each HAP-containing material;
 - c. the number of gallons of each coating, thinner, additive, and other material applied during the month;
 - d. the density of each coating, thinner, additive, and other material employed, in pound(s) per gallon;
 - e. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of [b.] times [c.] times [d.] for all the materials applied during the month, divided by 2,000 pounds per ton;
 - f. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from [e.] above;
 - g. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in [e.] above, for the present month plus the previous 11 months of operation, in ton(s); and
 - h. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in [f.] above, for the present month plus the previous 11 months of operation, in ton(s).

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Toledo Division of Environmental Services. Material Safety

Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D)]

- (3) The permittee shall maintain documentation (operating manual(s)) for the particulate filter system, along with documentation of any modifications deemed necessary by the permittee. This documentation shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(a)]

- (4) The permittee shall conduct periodic inspections of the particulate filter system to determine whether it is operating in accordance with the operating manual(s) and sound engineering judgment. These inspections shall be performed at a frequency that shall be based upon sound engineering judgment and the permittee shall maintain a copy of the recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

- (6) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(d) & (f)]

- (7) The permittee shall maintain records that document any time periods when the particulate filter system was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the particulate filter system was not operated according to the operating manual(s) with any documented

modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1)]

- (8) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building window, doors, roof monitors, ect.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. The location and color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. The total duration of any visible emission incident; and
 - e. Any corrective actions taken to minimize or eliminate the visible emissions.

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

- (9) Notwithstanding the frequency of reporting requirements specified in d)(8), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(8).

The permittee shall revert to daily observations if any visible emissions are observed.

- (10) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0104669, issued on 5/18/2009:d)(1) through d)(7). The monitoring and record keeping requirements

contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall notify the Director (Toledo Division of Environment Services) of any monthly record showing the use of noncompliant coatings as defined in b)(1)b. The notification shall include a copy of such record and shall be sent to the Director (Toledo Division of Environment Services) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC 3745-21-09(B)(3)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all exceedances of the rolling, 12-month individual HAP emission limitation;
 - b. all exceedances of the rolling, 12-month total HAP emission limitation;
 - c. any daily record showing that the particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) and sound engineering judgement when the emissions unit(s) was/were in operation; and
 - d. identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions. If no visible emissions observed, then state no visible emissions occurred during this period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) OAC rule 3745-17-07(A), and OAC rule 3745-31-05(D)]

- (3) The permittee shall notify the Toledo Division of Environmental Services within two weeks of becoming aware of an exceedance of either of the limits specified under b)(2)a.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

- (4) Unless specified otherwise, the deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0104669, issued on 5/18/2009:e)(2) and e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

- (1) Compliance with the coating restrictions in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions for all emissions units at the facility shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method:

The monitoring and recordkeeping requirement of B.2.a) will be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)]

c. Emission Limitation:

4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the Interior Body Coating, line 1 can body sprayers with oven(s).

Applicable Compliance Method:

Monthly records shall be maintained of the VOC content of all coatings employed. The monitoring and recordkeeping requirement d)(1) will be used to demonstrate compliance. In accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5), only coatings supplied by companies or entities that use USEPA Method 24 to determine the VOC content of coatings and properly report that content on USEPA-approved VOC Data Sheets shall be employed. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the USEPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(D)]

d. Emission Limitation:

2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the Continuous Motion Printer, line 1 deco & overvarnish with oven(s).

Applicable Compliance Method:

Monthly records shall be maintained of the VOC content of all coatings employed. The monitoring and recordkeeping requirement d)(1) will be used to demonstrate compliance. In accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5), only coatings supplied by companies or entities that use USEPA Method 24 to determine the VOC content of coatings and properly report that content on USEPA-approved VOC Data Sheets shall be employed. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the USEPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(D)]

e. Emission Limitation:

2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the continuous motion coater, line 1 base coating line with oven(s).

Applicable Compliance Method:

Monthly records shall be maintained of the VOC content of all coatings employed. The monitoring and recordkeeping requirement d)(1) will be used to demonstrate compliance. In accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5), only coatings supplied by companies or entities that use USEPA Method 24 to determine the VOC content of coatings and properly report that content on USEPA-approved VOC Data Sheets shall be employed. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the USEPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(D)]

- f. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0104669 issued on 5/18/2009: f(1)c. through f(1)e. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



2. K010, Modified Can Manufacturing Line 3

Operations, Property and/or Equipment Description:

Modified beverage can production line #3 for 24 oz. size cans – consisting of can making equipment (cupper, body makers and trimmers), a continuous motion printer with 3.00 mmBtu/hr printer pin oven and an interior body sprayer with a 3.55 mmBtu/hr inside bake oven; both the continuous motion printer oven and the inside bake oven to be controlled with a 7.3 mmBtu/hr regenerative thermal oxidizer (RTO).

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI P0108645 issued on 10/18/2011)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 50.21 tons per rolling, 12-month period.</p> <p>See b)(2)a. and c)(2).</p>
b.	ORC 3704.03(T) (PTI P0108645 issued on 10/18/2011)	<p>VOC emissions shall not exceed 14.04 pounds per hour.</p> <p>See b)(2)e. and b)(2)f.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0108645 issued on 10/18/2011)	<p>Sulfur dioxide (SO₂) emissions shall not exceed 0.01 pound per hour and 0.01 ton per year.</p> <p>Nitrogen Oxides (NO_x) emissions shall not exceed 0.64 pound per hour and 2.79 tons per year.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.54 pound per hour and 2.38 tons per year.</p> <p>Particulate matter of less than 10 microns in diameter (PM₁₀) shall not exceed 0.33 pound per hour and 1.21 tons per year.</p> <p>Filterable particulate (PE) emissions shall not exceed 0.29 pound per hour and 1.32 tons per year.</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)h.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)i.
e.	OAC rule 3745-17-07(A)(1)	Visible emissions from stacks serving this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
f.	OAC rule 3745-17-11(C)	See b)(2)j.
g.	OAC rule 3745-18-06(A)	See b)(2)c.
h.	40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496) [In accordance with 40 CFR 60.492, this emissions unit is a two-piece beverage can surface coating line with an over varnish and inside spray coating operation subject to the emission limitations specified in this section.]	See b)(2)b. and b)(2)d.
i.	OAC rule 3745-21-09(D)(1)	See b)(2)b.
j.	40 CFR Part 60 Subpart A (40 CFR 60.1 – 60.19)	See b)(2)g.
k.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) (64.1 – 64.10) [In accordance with 40 CFR 64.2, this emission unit is a major source of VOC emissions controlled with a regenerative thermal oxidizer]	See d)(3) and e)(4).



(2) Additional Terms and Conditions

- a. The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.
- b. The emission limitations established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- c. OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

- d. This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 is also federally enforceable.
- e. Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:

inks:	1.81 pounds per gallon of coating excluding water and exempt solvents;
over varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
	2.9 pounds per gallon of coating solids;
exterior bottom end varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;



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2.9 pounds per gallon of coating solids;

inside spray:

3.5 pounds per gallon of coating excluding water and exempt solvents;

6.8 pounds per gallon of coating solids;

f. For the regenerative thermal oxidizer (RTO), the capture efficiency shall be a minimum of 72% and the destructive efficiency shall be a minimum of 95% for VOC emissions from the continuous motion printer oven and inside body spray oven.

g. 40 CFR Part 60 Subpart A provides applicability, provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, NO_x, PE, PM₁₀, and CO emissions from this air contaminant source since the uncontrolled potential to emit for SO₂, NO_x, PE, PM₁₀, and CO emissions is less than ten tons per year.

j. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of this rule shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices (particulate filter system) and follow the work practice standards as stated in (C)(2) of this rule.

c) Operational Restrictions

(1) The permittee shall burn only natural gas as fuel in this emissions unit.

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



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- (2) Coating usage shall not exceed the following levels for this emissions unit based upon a rolling, 12-month summation of the usage rates:

Over varnish: 74,435 gallons;
Bottom varnish: 4,120 gallons;
Inside spray: 186,095 gallons; and
Inks: 7,188 gallons.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart WW, including the following sections:

60.492	Volume weighted calendar-average discharge of VOC to atmosphere restrictions.
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[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart WW]

- (4) The permittee shall not operate the body making equipment when the oil mist collection system is not in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall operate the particulate filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the operating manual(s) and sound engineering judgment.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(1) and (2)(b)]

- (6) In the event the particulate filter system is not operating in accordance with the operating manual(s) or sound engineering judgment, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the line:
- a. For the coatings:
 - i. the name and identification number of each coating (i.e., over varnish, bottom varnish, or inside spray coating), as applied;
 - ii. the volume of each coating employed, in gallons;
 - iii. the VOC content of each coating, in pounds of VOC per gallon of coating;
 - iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents;
 - v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied;
 - vi. the uncontrolled VOC emissions from all coatings applied, i.e., "ii." x "iii."
 - vii. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
 - viii. the total VOC emissions, both controlled and uncontrolled, from all coatings applied, i.e., the summation of "vi." for all uncontrolled coatings plus the summation of "vi." x "vii." for all coatings controlled by the thermal oxidizer.

Note: The inside spray, over varnish, and the bottom varnish coating emissions are currently controlled by the thermal oxidizer.

- b. For the inks:
 - i. the name and identification number of each ink, as applied;
 - ii. the volume (and mass) of each ink employed, in gallons (and pounds);
 - iii. the VOC content of each ink, in pounds of VOC per gallon (and pounds of VOC per pound) of ink;
 - iv. the VOC content of each ink, in pounds of VOC per gallon (and pounds of VOC per pound) of ink excluding water and exempt solvents;
 - v. the uncontrolled VOC emissions from all inks applied, i.e., "ii." x "iii."
 - vi. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
 - vii. the total VOC emissions from all inks applied, i.e., the summation of "v" for all uncontrolled inks plus the summation of "v." x "vi." for all inks controlled by the thermal oxidizer.

Note: The ink emissions are currently controlled by the thermal oxidizer.

- c. the rolling 12-month summation of VOC emissions from all coatings and inks employed, in tons, calculated by adding the sum of (2)a.viii. plus (2)b.vii. to the totals from the previous eleven months.
- d. the rolling 12-month summation, of each type of coating employed in gallons, calculated by adding the amounts recorded in (2)a.ii. to the amounts recorded in the previous eleven months.
- e. the rolling 12-month summation, of all the types of ink employed in gallons (and pounds), calculated by adding the amounts recorded in (2)b.ii. to the amounts recorded in the previous eleven months.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (3) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 0.75 percent of the temperature being measured or ± 4.5 degrees Fahrenheit (± 2.5 degrees Celsius), whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test (1616° F based on the emissions test performed on 7/8/09 for EU# K010, K011 and K012) that demonstrated the emissions unit to be in compliance;
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit;
 - c. whenever the monitored value for the combustion temperature deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations; and
 - d. in response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable combustion temperature specified

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above, 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 of the deviation, the total period of time during which there was a deviation, the combustion temperature 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.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3) and 40 CFR part 64]

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)]

- (5) Notwithstanding the frequency of reporting requirements specified in d)(4), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

- a. for one full quarter the facility's visual observations indicate no visible emissions; and
- b. the permittee continues to comply with all the record keeping and monitoring requirements specified in d)(4).

The permittee shall revert to daily observations if any visible emissions are observed.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)]

- (6) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
 - a. the name and identification number/code of each coating, thinner, additive, and any other material containing any HAP;
 - b. the weight fraction of each individual HAP contained in each material applied (and identified in [a.] above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, and other material applied during the month identified in a. above;
 - d. the density of each coating, thinner, additive, and other material employed and identified in a. above, in pound(s) per gallon;
 - e. for each coating operation not subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." for each HAP in coating;
 - f. for each coating operation subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." times "1 minus the overall control efficiency of the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance" for each HAP in each coating;
 - g. for each individual HAP, the sum of the calculated emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, in ton(s), i.e., the summation of the individual HAP emission rates calculated in [e.] and "f." above;
 - h. for combined HAPs, the calculated total combined HAPs emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates, calculated in [g.] above;
 - i. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in [g.] above, for the present month plus the previous 11 months of operation, in ton(s); and



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

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Toledo Division of Environmental Services contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

Note: The inside spray, over varnish, and the bottom varnish coating emissions and ink emissions are currently controlled by the thermal oxidizer.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart WW, including the following sections:

60.494	Recording device for incinerator
60.495(b) and (c)	Quarterly compliance coating recordkeeping
60.495(d)	Records retention duration

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart WW]

- (8) The permittee shall maintain daily records that document any time periods when the oil mist collection system was not in service when the body making equipment was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (9) The permittee shall maintain documentation (operating manual(s)) for the particulate filter system, along with documentation of any modifications deemed necessary by the permittee. This documentation shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(a)]

- (10) The permittee shall conduct periodic inspections of the particulate filter system to determine whether it is operating in accordance with the operating manual(s) and sound engineering judgment. These inspections shall be performed at a frequency that shall be based upon sound engineering judgment and the permittee shall maintain a copy of the recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

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- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the operating manual(s) and sound engineering judgment.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

- (12) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
- the date of the inspection;
 - a description of each/any problem identified and the date it was corrected;
 - a description of any maintenance and repairs performed; and
 - the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(d) & (f)]

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(e),(f), and (g)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emission unit, as fuel. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Toledo Division of Environmental Services of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60.495]

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

- a. all exceedances of the rolling, 12-month usage rate limitations for coatings specified under c)(2);
- b. all exceedances of the rolling, 12-month emission limitation for VOC;
- c. all exceedances of the rolling, 12-month emission limitations for individual HAP or any combination of HAP; and
- d. identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions. If no visible emissions observed, then state no visible emissions occurred during that period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

- (4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:
 - a. each period of time when the combustion temperature was outside the acceptable range;
 - b. an identification of each incident of deviation described in (4)a. where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (4)a. where prompt corrective action, that would bring the temperature 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 (4)a. where proper records were not maintained for the investigation and/or the corrective action.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) The permittee shall submit quarterly reports and other such notifications and reports through the Ohio EPA's eBusiness Center: Air Services online web portal as are required pursuant to 40 CFR Part 60, Subpart WW, per the following sections:



60.495(b) and (c)	Quarterly reporting requirements
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[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart WW]

- (6) The permittee shall notify the Toledo division of Environmental Services of any daily record showing that the oil mist collector 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 Toledo Division of Environmental Services) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall submit quarterly reports with any daily record showing that the particulate filter system was not in service or not operated according to the operating manual(s) and sound engineering judgment when the emissions unit(s) was/were in operation.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions from all emissions units at the facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

Applicable Compliance Method:

The monitoring and recordkeeping requirement of B.2.a) will be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]



b. Emission Limitation:

50.21 tons of VOC per rolling, 12-month period for this emissions unit

Applicable Compliance Method:

A one-time calculation of the yearly (12-month) federally enforceable usage limitation emissions, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

The emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

[Sum of {(Gallons of coating applied per year)(weight % of solvent)(density of coating)(1-CE)} + sum of {(fuel usage rating)(8760 hrs/yr)(5.5 lb/mmescf)(1-CE)}/(1020 mmBtu/mmescf)}/ (2000 lb/ton)

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

[(74,435 gal overvarnish/yr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)(1-0.684)+(4120 gal bottom varnish/yr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)(1-0.684)+(186,095 gal inside spray/yr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(7188 gal ink/yr)(0.14 lb VOC/lb ink)(12.96 lb/gal)(1-0.684)+(5.5 lb/mmescf)(3.00 mmBtu/hr)(8760 hr/yr)(1-0.684)/ (1020 mmBtu/mmescf)+(5.5 lb/mmescf)(3.55 mmBtu/hr)(8760 hr/yr)(1-0.684)/(1020 mmBtu/mmescf)]/(2000 lb/ton)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

c. Emission Limitation:

14.04 pounds of VOC per hour.

Applicable Compliance Method:

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

Sum of [(Gallons of coating applied per hour)(weight % of solvent)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmescf)(1-CE)}/(1020 mmBtu/mmescf)]

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.



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$(10.31 \text{ gal overvarnish/hr})(0.112 \text{ lb VOC/lbovervarnish})(8.75 \text{ lb/gal})(1-0.684)+(0.58 \text{ gal bottom varnish/hr})(0.149 \text{ lb VOC/lb bottom varnish})(9.0 \text{ lb/gal})(1-0.684)+(26.08 \text{ gal inside spray/hr})(0.144 \text{ lb VOC/lb inside spray})(8.43 \text{ lb/gal})(1-0.684)+(1.01 \text{ gal ink/hr})(0.14 \text{ lb VOC/lb ink})(12.96 \text{ lb/gal})(1-0.684)+(5.5 \text{ lb/mmBtu/hr})(3.00 \text{ mmBtu/hr})(1-0.684)/(1020 \text{ mmBtu/mmBtu/hr})+(5.5 \text{ lb/mmBtu/hr})(3.55 \text{ mmBtu/hr})(1-0.684)/(1020 \text{ mmBtu/mmBtu/hr})$

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

d. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)]

e. Emission Limitation:

2.1 pounds of VOC per gallon of coating (excluding water and exempt solvents) for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

2.9 pounds of VOC per gallon of coating solids for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

g. Emission limitation:

1.81 pounds of VOC per gallon of coating (excluding water and exempt solvents) for inks.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

h. Emission Limitation:

3.5 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the inside spray.



Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

i. Emission Limitation:

6.8 pounds of VOC per gallon of coating solids for the Inside spray.

Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be based upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

j. Emission Limitation:

PE shall not exceed 0.29 pound per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of

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Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: Divide the emission factor of 1.9 pounds of PE emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by the worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.90)=0.006)$.

If required, the permittee shall demonstrate compliance using Methods 1 thru 5 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

k. Emission Limitation:

PE shall not exceed 1.32 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PE emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

l. Emission Limitation:

SO₂ emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO₂ emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and

procedures specified in OAC rule 3745-18-04, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

m. Emission Limitation:

SO₂ emissions shall not exceed 0.01 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly SO₂ emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

n. Emission Limitation:

NO_x emissions shall not exceed 0.64 pound per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: Divide the emission factor of 100 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

o. Emission Limitation:

NO_x emissions shall not exceed 2.79 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly NO_x emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with

the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

p. Emission Limitation:

CO emissions shall not exceed 0.54 pound per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: Divide the emission factor of 84 pounds of CO emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

q. Emission Limitation:

CO emissions shall not exceed 2.38 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly CO emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

r. Emission Limitation:

PM₁₀ emissions shall not exceed 0.33 pound per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: Divide the emission factor of 7.6 pounds of PM₁₀ per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply by the maximum fuel use

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rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by the worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.90)=0.006)$.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

s. Emission Limitation:

PM₁₀ emissions shall not exceed 1.21 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PM₁₀ emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

t. Emission Limitation:

95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the continuous motion printer and inside body spray.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A and Method 204 through 204F of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternate method or procedure for the determination of capture efficiency in accordance with the US EPA'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 alternate if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall conduct, or have conducted, emission testing for the RTO in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall destructive efficiency limitation for VOC on the RTO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The control (destruction) efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Method 25 or 25A of 40 CFR Part 60 Appendix A, as appropriate, using the methods and procedures specified in OAC rule 3745-21-10(C) or an alternative test protocol approved by the Ohio EPA. 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.
 - d. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - e. The test(s) shall be conducted while the all the emissions units associated with the RTO are operating at or near their maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.
 - f. The permittee shall record the combustion temperature of the RTO at a minimum of 15-minute intervals during each run. The readings, as well as the 3-hour average combustion temperature during the test, shall be included in the test report.
 - g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services' refusal to accept the results of the emission test(s).
 - h. Personnel from Toledo Division of Environmental Services 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.
 - i. 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



Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



3. K011, Modified Can Manufacturing Line 4

Operations, Property and/or Equipment Description:

Modified beverage can production line #4 for 24 oz. size cans – consisting of can making equipment (cupper, body makers and trimmers), a continuous motion printer with a 2.75 mmBtu/hr oven and an interior body spray coater with a 5.2 mmBtu/hr inside bake oven; the inside bake oven controlled with a 7.3 mmBtu/hr regenerative thermal oxidizer (RTO).

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI P0108645 issued 10/18/2011)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 71.60 tons per rolling, 12-month period from line 4.</p> <p>See b)(2)a. and c)(2).</p>
b.	ORC 3704.03(T) (PTI P0108645 issued 10/18/2011)	<p>VOC emissions shall not exceed 22.51 pounds per hour.</p> <p>See b)(2)c. and b)(2)e.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0108645 issued 10/18/2011)	<p>Sulfur dioxide (SO₂) emissions shall not exceed 0.01 pound per hour and 0.02 ton per year.</p> <p>Nitrogen Oxides (NO_x) emissions shall not exceed 0.78 pound per hour and 3.41 tons per year.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.66 pound per hour and 2.89 tons per year.</p> <p>Particulate matter of less than 10 microns in diameter (PM₁₀) shall not exceed 0.34 pound per hour and 1.15 tons per year.</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Filterable particulate (PE) shall not exceed 0.30 pound per hour and 0.94 ton per year. See b)(2)h.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See (2)i.
e.	OAC rule 3745-17-07(A)(1)	Visible Emissions (VE) from this emissions unit shall not exceed 20% opacity as a six minute average.
f.	OAC rule 3745-17-11(C)	See b)(2)j.
g.	OAC rule 3745-18-06(A)	See (2)f.
h.	40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496) [In accordance with 40 CFR 60.492, this emissions unit is a two-piece beverage can surface coating line with an overvarnish and inside spray coating operation subject to the emission limitations specified in this section.]	See b)(2)b. and (2)d.
i.	OAC rule 3745-21-09(D)	See b)(2)b.
j.	40 CFR Part 60 Subpart A (40 CFR 60.1 – 60.19)	See b)(2)g.
k.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) (40 CFR 64.1 – 64.10) [In accordance with 40 CFR 64.2, this facility is a major source of VOC emissions and the emissions are controlled by a regenerative thermal incinerator.]	See b)(2)e., d)(4), and e)(5).

(2) Additional Terms and Conditions

- a. The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

- b. The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- c. Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:
 - inks: 1.81 pounds per gallon of coating excluding water and exempt solvents;
 - over varnish: 2.1 pounds per gallon of coating excluding water and exempt solvents;
2.9 pounds per gallon of coating solids;
 - exterior bottom end varnish: 2.1 pounds per gallon of coating excluding water and exempt solvents;
2.9 pounds per gallon of coating solids;
 - inside spray: 3.5 pounds per gallon of coating excluding water and exempt solvents;
6.8 pounds per gallon of coating solids; and
- d. This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- e. For the regenerative thermal oxidizer (RTO), the capture efficiency shall be a minimum of 72% and the destructive efficiency shall be a minimum of 95% for VOC emissions from the inside body spray oven.
- f. OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 BTU per standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore,

this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

- g. 40 CFR Part 60 Subpart A provides applicability, provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- i. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO_x, SO₂, PE, and PM₁₀ emissions from this air contaminant source since the uncontrolled potential to emit for CO, NO_x, SO₂, PE, and PM₁₀ emissions are less than 10 tons per year.
- j. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of this rule shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices (particulate filter system) and follow the work practice standards as stated in (C)(2) of this rule.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]
- (2) Coating material usage shall not exceed the following levels for this emissions unit based upon a rolling, 12-month summation of the usage rates:

Inside spray:	165,812 gallons;
Over varnish:	64,088 gallons;
Bottom varnish:	3,671 gallons; and



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Inks: 6,404 gallons.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D)]

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart WW, including the following sections:

60.492	Volume weighted calendar-average discharge of VOC to atmosphere restrictions.
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[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart WW]

- (4) The permittee shall not operate the body making equipment when the oil mist collection system is not in operation.

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

- (5) The permittee shall operate the particulate filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the operating manual(s) and sound engineering judgment.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(1) and (2)(b)]

- (6) In the event the particulate filter system is not operating in accordance with the operating manual(s) or sound engineering judgment, the control device shall be expeditiously repaired or otherwise returned to documented operating conditions.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain daily records that document any time periods when the oil mist collection system was not in service when the body making equipment was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the line:

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- a. For the coatings:
- i. the name and identification number of each coating (i.e., over varnish, bottom varnish or inside spray coating), as applied,
 - ii. the total volume of each coating for the month, in gallons;
 - iii. the VOC content of each coating, in pounds of VOC per gallon of coating;
 - iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents;
 - v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied;
 - vi. the uncontrolled VOC emissions from all coatings applied, i.e., "ii." x "iii."
 - vii. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
 - viii. the total VOC emissions, both controlled and uncontrolled, from all coatings applied, i.e., summation of "vi." for all uncontrolled coating plus the summation of "vi." x "vii." for all coatings controlled by the thermal oxidizer.

Note: The inside spray coating VOC emissions are the only emissions currently controlled by the thermal oxidizer.

- b. For the inks:
- i. the name and identification number of each ink, as applied,
 - ii. the volume (and mass) of each ink, in gallons (and pounds),
 - iii. the VOC content of each ink, in pounds of VOC per gallon (and pounds of VOC per pound) of ink,
 - iv. the VOC content of each ink, in pounds of VOC per gallon of coating excluding water and exempt solvents, and
 - v. the uncontrolled VOC emissions from all inks applied, i.e. "ii." x "iii."

Note: The ink emissions are not currently controlled by the thermal oxidizer.

- c. the rolling 12-month summation of VOC emissions from all coatings and inks employed, in tons, calculated by adding the sum of (3)a.viii. and (3)b.v. to the totals from the previous eleven months.
- d. the rolling 12-month summation, of each type of coating employed in gallons, calculated by adding the amounts recorded in (3)a.ii. to the amounts recorded in the previous eleven months.

- e. the rolling 12-month summation, of all the types of ink employed in gallons, calculated by adding the amounts recorded in (3)b.ii. to the amounts recorded in the previous eleven months.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (4) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 0.75 percent of the temperature being measured or ± 4.5 degrees Fahrenheit (± 2.5 degrees Celsius), whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test (1616° F based on the emissions test performed on 7/8/08 for EU # K010, K011 and K012) that demonstrated the emissions unit to be in compliance;
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit;
 - c. whenever the monitored value for the combustion temperature deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations; and
 - d. in response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable combustion temperature specified above, 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 of the deviation, the total period of time during which there was a deviation, the combustion temperature 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
- a. the name and identification number/code of each coating, thinner, additive, and any other material containing any HAP;
 - b. the weight fraction of each individual HAP contained in each material applied (and identified in [a.] above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, and other material applied during the month as identified in a. above;
 - d. the density of each coating, thinner, additive, and other material employed, in pound(s) per gallon as identified in a. above;
 - e. for each coating operation not subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." for each HAP in each coating;
 - f. for each coating operation subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." times "1 minus the overall control efficiency of the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance" for each HAP in each coating;
 - g. for each individual HAP, the sum of the calculated emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, in ton(s), i.e., the summation of the individual HAP emission rate calculated in [e.] and "f." above;
 - h. for combined HAPs, the calculated total combined HAPs emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates, calculated in [g.] above;
 - i. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in [g.] above, for the present month plus the previous 11 months of operation, in ton(s); and

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

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Toledo Division of Environmental Services contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

Note: The inside spray coating VOC emissions are the only emissions currently controlled by the thermal oxidizer.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (7) Notwithstanding the frequency of reporting requirements specified in d)(6), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:



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- a. For one full quarter the facility’s visual observations indicate no visible emissions; and
- b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d(6).

The permittee shall revert to daily observations if any visible emissions are observed.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart WW, including the following sections:

60.495(b) and (c)	Quarterly compliance coating recordkeeping
60.495(d)	Records retention duration

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart WW]

- (9) The permittee shall maintain documentation (operating manual(s)) for the particulate filter system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(a)]

- (10) The permittee shall conduct periodic inspections of the particulate filter system to determine whether it is operating in accordance with the operating manual(s) with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the sound engineering judgment and the permittee shall maintain a copy of the recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(c)]

- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the operating manual(s) and sound engineering judgment.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(c)]

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

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

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC 3745-17-11(C)(2)(d) and (f)]

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit as fuel. Each report shall be submitted within 30 days after the deviation occurs to the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Toledo Division of Environmental Services of any daily record showing that the oil mist collector 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 Toledo Division of Environmental Services) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall notify the Toledo Division of Environmental Services of any monthly record showing the use of non-complying coatings or inks. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60.495]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all exceedances of the rolling, 12-month usage rate limitations for coatings and inks specified under c)(2);



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- b. all exceedances of the rolling, 12-month emission limitation for VOC;
- c. all exceedances of the rolling, 12-month emission limitations for individual HAP or any combination of HAPs;
- d. identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions. If no visible emissions observed, then state no visible emissions occurred during that period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (5) The permittee shall submit quarterly reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:
 - a. each period of time when the combustion temperature was outside the acceptable range;
 - b. an identification of each incident of deviation described in (5)a. where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (5)a. where prompt corrective action, that would bring the temperature 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 (5)a. where proper records were not maintained for the investigation and/or the corrective action.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) The permittee submit semiannual reports and other such notifications and reports through the Ohio EPA's eBusiness Center: Air Services online web portal as are required pursuant to 40 CFR Part 60, Subpart WW, per the following sections:

60.495(b) and (c)	Quarterly reporting requirements
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[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall submit quarterly reports with any daily record showing that the particulate filter system was not in service or not operated according to the operating manual(s) and sound engineering judgment when the emissions unit(s) was/were in operation.

[Authority for term: OAC rule 3745-31-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with b)(1) and (b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions from all emissions units at the facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

Applicable Compliance Method:

The monitoring and record keeping requirement of B.2.a) will be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

b. Emission Limitation:

VOC emissions shall not exceed 71.60 tons per rolling, 12-month period from this emissions unit.

Applicable Compliance Method:

A one-time calculation of the yearly (12-month) federally enforceable usage limitation of emissions, based upon the worst case scenario, shall be used to demonstrate compliance with this limitation.

The emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:



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[Sum of {(Gallons of coating applied per year)(weight % of solvent)(density of coating)(1-CE)} + sum of {(fuel usage rating)(8760 hrs/yr)(5.5 lb/mmscf)(1-CE)/(1020 mmBtu/mmscf)}]/(2000 lb/ton)

CE = overall percentage capture and control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance. CE=0 for overvarnish, bottom varnish and inks on coating and oven emissions due to no RTO controls.

[(64,088 gal overvarnish/yr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)+(3671 gal bottom varnish/yr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)+(165,812 gal inside spray/yr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(6404 gal ink/yr)(0.14 lb VOC/lb ink)(12.96 lb/gal)+(5.5 lb/mmscf)(2.75 mmBtu/hr)(8760 hr/yr)/(1020 mmBtu/mmscf)+(5.5 lb/mmscf)(5.20 mmBtu/hr)(8760 hr/yr)(1-0.684)/(1020 mmBtu/mmscf)]/(2000 lb/ton)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

c. Emission Limitation:

VOC emissions shall not exceed 22.51 pounds per hour.

Applicable Compliance Method:

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings with the inside spray emissions controlled by the RTO:

Sum of [Gallons of coating applied per hour](weight % of solvent)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmscf)(1-CE)]/1020 mmBtu/mmscf] CE=0 for all coatings, inks, and other materials except inside spray and inside spray oven.

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

(10.08 gal overvarnish/hr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)+(0.58 gal bottom varnish/hr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)+(26.08 gal inside spray/hr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(1.01 gal ink/hr)(0.14 lb VOC/lb ink)(12.96 lb/gal)+(5.5 lb/mmscf)(2.75 mmBtu/hr)/(1020 mmBtu/mmscf)+(5.5 lb/mmscf)(5.20 mmBtu/hr)(1-0.684)/(1020 mmBtu/mmscf)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

d. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions readings taken in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)]

e. Emission Limitation:

PE shall not exceed 0.30 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 1.9 pounds of PE per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by the worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.90)=0.006)$.

If required, the permittee shall demonstrate compliance using Methods 1 thru 5 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

PE shall not exceed 0.94 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PE emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

g. Emission Limitation:

SO₂ emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 0.6 pound of SO₂ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

If required, the permittee shall demonstrate compliance with this emission limitation through the methods and procedures of OAC rule 3745-18-04(E)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

h. Emission Limitation:

SO₂ emissions shall not exceed 0.02 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly SO₂ emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

i. Emission Limitation:

NO_x emissions shall not exceed 0.78 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 100 pounds of NO_x per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4

and Method 7 of 40 CFR, Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

j. Emission Limitation:

NO_x emissions shall not exceed 3.41 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly NO_x emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

k. Emission Limitation:

CO emissions shall not exceed 0.66 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 84 pounds of NO_x per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

l. Emission Limitation:

CO emissions shall not exceed 2.89 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly CO emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with

the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

m. Emission Limitation:

PM₁₀ emissions shall not exceed 0.34 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 7.6 pounds of PM₁₀ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by the worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency ((1-0.94)(1-0.90)=0.006).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

n. Emission Limitation:

PM₁₀ emissions shall not exceed 1.15 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PM₁₀ emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

o. Emission limitation:

inks: 1.81 pounds of VOC per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

p. Emission limitation:

over varnish: 2.1 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

q. Emission limitation:

over varnish: 2.9 pounds of VOC per gallon of coating solids

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and 40 CFR



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60.496 using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

r. Emission limitation:

bottom varnish (exterior bottom end coating): 2.1 pounds of VOC per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

s. Emission limitation:

bottom varnish (exterior bottom end coating): 2.9 pounds of VOC per gallon of coating solids.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix



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A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

t. Emission limitation:

inside spray: 3.5 pounds of VOC per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

u. Emission limitation:

inside spray: 6.8 pounds of VOC per gallon of coating solids

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US

EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

v. Emission Limitation:

95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the inside body spray.

Applicable compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through emissions testing performed in accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A and Method 204 through 204F of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternate method or procedure for the determination of capture efficiency in accordance with US EPA's "Guidelines of 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.)

(2) The permittee shall conduct, or have conducted, emission testing for the RTO in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the overall destructive efficiency limitation for VOC on the RTO.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The control (destruction) efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Method 25 or 25A of 40 CFR Part 60 Appendix A, as appropriate, using the methods and procedures specified in OAC rule 3745-21-10(C) or an alternative test protocol approved by the Ohio EPA. 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.

- d. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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- e. The test(s) shall be conducted while the all the emissions units associated with the RTO are operating at or near their maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.
- f. The permittee shall record the combustion temperature of the RTO at a minimum of 15-minute intervals during each run. The readings, as well as the 3-hour average combustion temperature during the test, shall be included in the test report.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services' refusal to accept the results of the emission test(s).
- h. Personnel from Toledo Division of Environmental Services 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.
- i. 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 Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) **Miscellaneous Requirements**

- (1) None.



4. K012, Can Manufacturing Line 2

Operations, Property and/or Equipment Description:

Modified beverage can production line #2 for 8 oz. and 12 oz. size sleek and regular cans – consisting of can making equipment (cupper, body makers and trimmers); a continuous motion basecoater with a 3.00 mmBtu/hrbasecoater oven; continuous motion printer with 2.75 mmBtu/hr continuous motion printer oven; and an interior body sprayer with a 5.70 mmBtu/hr inside bake oven; all controlled with a regenerative thermal oxidizer (RTO).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI P0108645 issued 10/18/2011)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 41.32 tons per rolling, 12-month period.</p> <p>See b)(2)b. and c)(2).</p>
b.	ORC 3704.03(T) (PTI P0108645 issued 10/18/2011)	<p>VOC emissions shall not exceed 12.38 pounds per hour.</p> <p>See b)(2)a. and b)(2)c.</p>
	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0108645 issued 10/18/2011)	<p>Sulfur dioxide (SO₂) emissions shall not exceed 0.03 pound per hour and 0.12 ton per year.</p> <p>Nitrogen Oxides (NO_x) emissions shall not exceed 1.12 pounds per hour and 4.92 tons per year.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.95 pound per hour and 4.13 tons per year.</p> <p>Particulate matter of less than 10 microns in diameter (PM₁₀) shall not exceed 0.28</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pound per hour and 1.03 tons per year. Filterable particulate (PE) shall not exceed 0.23 pound per hour and 0.78 ton per year. See b)(2)h.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)i.
d.	OAC rule 3745-17-07(A)(1)	Visible emissions from stacks serving this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
e.	OAC rule 3745-17-11(C)	See b)(2)j.
f.	OAC rule 3745-18-06(A)	See b)(2)d.
g.	40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496) [In accordance with 40 CFR 60.492, this emissions unit is a two-piece beverage can surface coating line with an exterior base coating, overvarnish, and inside spray coating operation subject to the emission limitations specified in this section.]	See b)(2)e. and b)(2)f.
h.	OAC rule 3745-21-09(D)(1)	See b)(2)e.
i.	40 CFR Part 60 Subpart A (40 CFR 60.1 – 60.19)	See b)(2)g.
j.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) (40 CFR 64.1 – 64.10) [In accordance with 40 CFR 64.2, this facility is a major source of VOC emissions and the emissions are controlled by a regenerative thermal incinerator.]	See d)(3) and e)(4).

(2) Additional Terms and Conditions

- a. For the regenerative thermal oxidizer (RTO), the capture efficiency shall be a minimum of 72% and the destructive efficiency shall be a minimum of 95% for VOC emissions from the coatings and inks.
- b. The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.
- c. Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:

Inks:	1.81 pounds per gallon of coating excluding water and exempt solvents;
basecoat:	1.8 pounds per gallon of coating excluding water and exempt solvents;
	2.4 pounds per gallon of coating solids;
over varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
	2.9 pounds per gallon of coating solids;
Exterior bottom end varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
	2.9 pounds per gallon of coating solids;
inside spray:	3.5 pounds per gallon of coating excluding water and exempt solvents;
	6.8 pounds per gallon of coating solids; and

- d. OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

- e. The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- f. This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 is also federally enforceable.
- g. 40 CFR Part 60 Subpart A provides applicability, provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- i. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, NO_x, PE, PM₁₀, and CO emissions from this air contaminant source since the uncontrolled potential to emit for SO₂, NO_x, PE, PM₁₀ and CO is less than 10 tons per year.

- j. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of this rule shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices (particulate filter system) and follow the work practice standards as stated in (C)(2) of this rule.



c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emission unit.

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

- (2) Coating and ink usage in this emissions unit shall not exceed the following levels for this emissions unit based upon a rolling, 12-month summation of the usage rates:

- Base coat: 35,597 gallons;
- Over varnish: 64,335 gallons;
- Bottom varnish: 2,885 gallons;
- Inside spray: 124,021 gallons; and
- Inks: 4,363 gallons.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D)]

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart WW, including the following sections:

60.492	Volume weighted calendar-average discharge of VOC to atmosphere restrictions.
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[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart WW]

- (4) The permittee shall not operate the body making equipment when the oil mist collection system is not in operation.

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

- (5) The permittee shall operate the particulate filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the operating manual(s) and sound engineering judgment.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 374517-11(C)(1) and (2)(b)]

- (6) In the event the particulate filter system is not operating in accordance with operating manual(s) or sound engineering judgment, the control device shall be expeditiously repaired or otherwise returned to documented operating conditions.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the line:

a. For the coatings:

- i. the name and identification number of each coating (i.e., over varnish, bottom varnish, inside spray coating, or basecoat coating), as applied;
- ii. the volume of each coating employed, in gallons;
- iii. the VOC content of each coating, in pounds of VOC per gallon of coating;
- iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents;
- v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied; and
- vi. the uncontrolled VOC emissions from all coatings applied, i.e. "ii." x "iii.";
- vii. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
- viii. the total VOC emissions, both controlled and uncontrolled, from all coatings applied, i.e. summation of "vi." for all uncontrolled coatings plus the summation of "vi." x "vii." for all coatings controlled by the thermal oxidizer.

Note: The basecoat, inside spray, over varnish, and the bottom varnish coating emissions are currently controlled by the thermal oxidizer.

b. For the inks:

- i. the name and identification number of each ink, as applied;
- ii. the volume (and mass) of ink employed, in gallons (and pounds);
- iii. the VOC content of each ink, in pounds of VOC per gallon (and pounds of VOC per pound) of ink;
- iv. the VOC content of each ink, in pounds of VOC per gallon (and pounds of VOC per pound) of ink excluding water and exempt solvents; and

- v. the uncontrolled VOC emissions from all inks applied, i.e. "ii." x "iii.";
- vi. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
- vii. the total controlled VOC emissions from all inks applied, i.e. "v." x "vi."

Note: The ink emissions are currently controlled by the thermal oxidizer.

- c. the rolling 12-month summation of VOC emissions from all coatings and inks employed, in tons, calculated by adding the sum of (2)a.viii. and (2)b.vii. to the totals from the previous eleven months.
- d. the rolling 12-month summation, of each type of coating employed in gallons, calculated by adding the amounts recorded in (2)a.ii. to the amounts recorded in the previous eleven months.
- e. the rolling 12-month summation, of all the types of ink employed in gallons (and pounds), calculated by adding the amounts recorded in (2)b.ii. to the amounts recorded in the previous eleven months.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (3) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 0.75 percent of the temperature being measured or ± 4.5 degrees Fahrenheit (± 2.5 degrees Celsius), whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test (1616° F based on the emissions test performed on 7/8/08 for EU # K010, K011 and K012) that demonstrated the emissions unit to be in compliance;
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit;
 - c. whenever the monitored value for the combustion temperature deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for

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each investigation: the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations; and

- d. in response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable combustion temperature specified above, 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 of the deviation, the total period of time during which there was a deviation, the combustion temperature 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (4)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (5) Notwithstanding the frequency of reporting requirements specified in d)(4), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(4).

The permittee shall revert to daily observations if any visible emissions are observed.

- (6) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
- a. the name and identification number/code of each coating, thinner, additive, and any other material containing any HAP;
 - b. the weight fraction of each individual HAP contained in each material applied (and identified in [a.] above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, and other material applied during the month as identified in a. above;
 - d. the density of each coating, thinner, additive, and other material employed, in pound(s) per gallon as identified in a. above;
 - e. for each coating operation not subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." for each HAP in each coating;
 - f. for each coating operation subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." times "1 minus the overall control efficiency of the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance" for each HAP in each coating;
 - g. for each individual HAP, the sum of the calculated emission rate for all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, in ton(s), i.e., the summation of the individual HAP emission rates, calculated in "e." and "f." above;
 - h. the combined HAPs, the calculated total combined HAPs emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates, calculated in "g." above;
 - i. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded



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in "g." above, for the present month plus the previous 11 months of operation, in ton(s); and

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

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Toledo Division of Environmental Services' contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

Note: The basecoat, inside spray, over varnish, inks and the bottom varnish coating emissions are currently controlled by the thermal oxidizer.

[Authority for term: OAC rule 3745-77-07(C)(1) and AOC rule 3745-31-05(D)]

- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart WW, including the following sections:

60.495(b) and (c)	Quarterly compliance coating recordkeeping
60.495(d)	Records retention duration

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart WW]

- (8) The permittee shall maintain daily records that document any time periods when the oil mist collection system was not in service when the body making equipment was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (9) The permittee shall maintain documentation (operating manual(s)) for the particulate filtering system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(a)]

- (10) The permittee shall conduct periodic inspections of the particulate filter system to determine whether it is operating in accordance with the operating manual(s) and sound engineering judgment. These inspections shall be performed at a frequency that shall be based upon sound engineering judgment and the permittee shall maintain a copy of the recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the operating manual(s) and sound engineering judgment.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

- (12) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
- The date of the inspection;
 - A description of each/any problem identified and the date it was corrected;
 - A description of any maintenance and repairs performed; and
 - The name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Toledo Division of Environmental Services upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(e),(f), and (g), for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emission unit, as fuel. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Toledo Division of Environmental Services of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60.495]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all exceedences of the rolling, 12-month usage rate limitations for coatings specified under c)(2);
 - b. all exceedences of the rolling, 12-month emission limitation for VOC;
 - c. all exceedences of the rolling, 12-month emission limitations for individual HAP or any combination of HAPs;
 - d. all days during which any visible particulate emissions were observed from any stack serving this emissions unit; and
 - e. describe any corrective actions taken to eliminate the visible particulate emissions. If no visible emissions observed, then submit a report which states no visible emissions occurred during that period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:
- a. each period of time when the combustion temperature was outside the acceptable range;
 - b. an identification of each incident of deviation described in (4)a. where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (4)a. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. and identification of each incident of deviation described in (4)a. where proper records were not maintained for the investigation and/or the corrective action.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



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- (5) The permittee submit semiannual reports and other such notifications and reports through the Ohio EPA's eBusiness Center: Air Services online web portal as are required pursuant to 40 CFR Part 60, Subpart WW, per the following sections:

60.495(b) and (c)	Quarterly reporting requirements
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[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart WW]

- (6) The permittee shall notify the Toledo Division of Environmental Services of any daily record showing that the oil mist collector 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 Toledo Division of Environmental Services within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall submit quarterly reports with any daily record showing that the particulate filter system was not in service or not operating according to the operating manual(s) and sound engineering judgment when the emissions unit(s) was/were in operation.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions from all emissions units at the facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.



Applicable Compliance Method:

The monitoring and record keeping requirements of B.2.a) will be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

b. Emission Limitation:

VOC emissions shall not exceed 41.32 tons per rolling, 12-month period.

Applicable Compliance Method:

A one-time calculation of the yearly (12-month) federally enforceable usage limitation of emissions, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

The emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

[Sum of {(Gallons of coating applied per year)(weight % of solvent)(density of coating)(1-CE)} + sum of {(fuel usage rating)(8760 hrs/yr)(5.5 lb/mmscf)(1-CE)}/(1020 mmBtu/mmscf)}/(2000 lb/ton)

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

[(35,597 gal basecoat/yr)(0.088 lb VOC/lb basecoat)(11.0 lb/gal)(1-0.684)+(64,335 gal overvarnish/yr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)(1-0.684)+(2885 gal bottom varnish/yr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)(1-0.684)+(124,021 gal inside spray/yr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(4363 gal ink/yr)(0.14 lb VOC/lb ink)(12.96 lb/gal)(1-0.684)+(5.5 lb/mmscf)(3.00 mmBtu/hr)(8760 hrs/yr)(1-0.684)/(1020 mmBtu/mmscf)+(5.5 lb/mmscf)(2.75 mmBtu/hr)(8760 hrs/yr)(1-0.684)/(1020 mmBtu/mmscf)+5.5 lb/mmscf)(5.70 mmBtu/hr)(8760 hrs/yr)(1-0.684)/(1020 mmBtu/mmscf)}/(2000 lb/ton)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

c. Emission Limitation:

VOC emissions shall not exceed 12.38 pounds per hour.

Applicable Compliance Method:

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

Effective Date: To be entered upon final issuance

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

Sum of [(Gallons of coating applied per hour)(weight % of solvent)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmBtu)(1-CE)]/1020 mmBtu/mmBtu

CE = overall percentage capture and control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

(5.75 gal basecoat/hr)(0.088 lb VOC/lb basecoat)(11.0 lb/gal)(1-0.684)+(9.43 gal overvarnish/hr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)(1-0.684)+(0.43 gal bottom varnish/hr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)(1-0.684)+(18.39 gal inside spray/hr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(0.71 gal ink/hr)(0.14 lb VOC/lb ink)(12.96 lb/gal)(1-0.684)+(5.5 lb/mmBtu)(3.00 mmBtu/hr)(1-0.684)/(1020 mmBtu/mmBtu)+(5.5 lb/mmBtu)(2.75 mmBtu/hr)(1-0.684)/(1020 mmBtu/mmBtu)+ (5.5 lb/mmBtu)(5.70 mmBtu/hr)(1-0.684)/(1020 mmBtu/mmBtu)

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

d. Emission limitation:

1.8 pounds of VOC per gallon of coating (minus water and exempt solvents) for the continuous motion base coat coating line.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

e. Emission limitation:

2.40 pound of VOC per gallon of coating solids for the continuous motion base coat coating line.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)]

g. Emission Limitation:

2.1 pounds of VOC per gallon of coating (excluding water and exempt solvents) for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use

formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

h. Emission Limitation:

2.9 pounds of VOC per gallon of coating solids for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

i. Emission limitation:

1.81 pounds of VOC per gallon of coating (excluding water and exempt solvents) for inks.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

j. Emission Limitation:

3.5 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the interior body coating line, line 2 can body sprayers.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

k. Emission Limitation:

6.8 pounds of VOC per gallon of coating solids for the Interior Body Coating, line 2 can body sprayers.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be based upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

I. Emission Limitation:

PE shall not exceed 0.23 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 1.9 pounds of PE per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.70 mmBTU per hour inside bake oven and 3.0 mmBTU per hour coating oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by the worst case emissions calculation as follows: multiplying the maximum coating usage (18.39 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.90)=0.006)$.

If required, the permittee shall demonstrate compliance using Methods 1 thru 5 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

m. Emission Limitation:

PE shall not exceed 0.78 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PE emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

n. Emission Limitation:

SO₂ emissions shall not exceed 0.03 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

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Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 0.6 pound of SO₂ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven, and 3.0 mmBTU per hour coating oven.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with Method 19 or Methods 1 through 4 and 6 of 40 CFR, Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

o. Emission Limitation:

SO₂ emissions shall not exceed 0.12 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly SO₂ emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

p. Emission Limitation:

NO_x emissions shall not exceed 1.12 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 100 pounds of NO_x per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven, and 3.0 mmBTU per hour coating oven.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and Method 7 of 40 CFR, Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

q. Emission Limitation:

NO_x emissions shall not exceed 4.92 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly NO_x emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

r. Emission Limitation:

CO emissions shall not exceed 0.95 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 84 pounds of NO_x per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven, and 3.0 mmBTU per hour coating oven.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

s. Emission Limitation:

CO emissions shall not exceed 4.13 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly CO emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

t. Emission Limitation:

PM₁₀ emissions shall not exceed 0.28 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 7.6 pounds of PM₁₀ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven, and 3.0 mmBTU per hour coating oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by the worst case emissions calculation as follows: multiplying the maximum coating usage (18.39 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.90)=0.006)$.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

u. Emission Limitation:

PM₁₀ emissions shall not exceed 1.03 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PM₁₀ emission limitation by the maximum annual hours of operation (8,760 hour), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

v. Emission Limitation:

95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the basecoater, continuous motion printer and the inside body spray.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 and 25A of 40 CFR Part 60 Appendix A and Method 204 through 204F of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternate method or procedure for the determination of capture efficiency in accordance with the US EPA'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 alternate if such approval does not contravene any other applicable requirement.)

- (2) The permittee shall conduct, or have conducted, emission testing for the RTO in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall destructive efficiency limitation for VOC on the RTO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The control (destruction) efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Method 25 or 25A of 40 CFR Part 60 Appendix A, as appropriate, using the methods and procedures specified in OAC rule 3745-21-10(C) or an alternative test protocol approved by the Ohio EPA. 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.

- d. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- e. The test(s) shall be conducted while the all the emissions units associated with the RTO are operating at or near their maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.
- f. The permittee shall record the combustion temperature of the RTO at a minimum of 15-minute intervals during each run. The readings, as well as the 3-hour average combustion temperature during the test, shall be included in the test report.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services' refusal to accept the results of the emission test(s).

- h. Personnel from Toledo Division of Environmental Services 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.
- i. 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 Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) **Miscellaneous Requirements**

- (1) None.



5. K015, Clean-up Operation

Operations, Property and/or Equipment Description:

Clean-up operation, facility-wide

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0108645 issued 10/18/2011)	<p>Volatile Organic compounds (VOC) emissions shall not exceed 6.55 pounds of VOC per gallon of solvent.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06 (PTI P0108645 issued 10/18/2011)	See b)(2)b.
c.	OAC rule 3745-31-05(D)(3) (PTI P0108645 issued 10/18/2011)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 6.55 tons per rolling, 12-month period.</p> <p>See c)(1) and c)(2).</p>

(2) Additional Terms and Conditions

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

December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

Permit to Install P0108645 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Clean-up material usage shall not exceed 2,000 gallons per rolling, 12-month period;
- ii. VOC emissions shall not exceed 6.55 pounds of VOC per gallon; and
- iii. Clean-up solvent shall not contain HAP.

c) **Operational Restrictions**

- (1) Clean-up material usage shall not exceed 2,000 gallons per rolling, 12-month period.

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

- (2) Clean-up solvent shall not contain HAP.

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for the clean-up solvent:

- a. The name and identification number of each clean-up material employed;
- b. The volume of each clean-up material employed, in gallons;
- c. the VOC content of each clean-up material employed, in pounds of VOC per gallon;
- d. An identification of whether or not each clean-up material employed contains HAP;
- e. The monthly total VOC emissions from all clean-up materials employed, [b. x c.]/2000, in tons;
- f. The rolling, 12-month summation of VOC emissions from all clean-up materials employed, calculated by adding the monthly total emissions calculated in d)(1)e. with the monthly totals of the previous eleven months; and

- g. The rolling, 12-month summation of clean-up materials employed, in gallons, calculated by adding the monthly total volume of clean-up materials used as recorded in d)(1)b. with the amount used the previous eleven months.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All exceedances of the VOC emissions limit of 6.55 pounds of VOC per gallon;
 - b. All exceedances of the rolling, 12-month usage rate limitation for clean-up materials specified under c)(1);
 - c. All exceedances of the rolling, 12-month emission limitation of VOC; and
 - d. Any day in which a HAP-containing clean-up material was employed and the individual HAP emissions for each such day.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
Clean-up solvent: 6.55 pounds of VOC per gallon

Applicable Compliance Method:

The permittee shall determine the VOC content of the clean-up solvent from the manufacturer's formulation data. The monitoring and record keeping requirement of d)(1) will be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation:

6.55 tons of VOC per rolling, 12-month period for this emissions unit.

Applicable Compliance Method:

A one-time calculation of the federally enforceable usage limitation emissions, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation. Therefore compliance with the material usage restriction will demonstrate compliance with this restriction.

(material usage in gallons per year)(VOC content of solvent in pounds per gallon)/(2000 pounds per ton)

(2000 gallons/yr)(6.55 lb VOC/gallon)/(2000 lbs/ton)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D)]

g) Miscellaneous Requirements

(1) None.