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

Certified Mail

6/28/2012

Mr. THOMAS ALCARO
EXAL CORP
ONE PERFORMANCE PL
YOUNGSTOWN, OH 44502

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0250110920
Permit Number: P0110001
Permit Type: Initial Installation
County: Mahoning

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NEDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
EXAL CORP

Facility ID:	0250110920
Permit Number:	P0110001
Permit Type:	Initial Installation
Issued:	6/28/2012
Effective:	6/28/2012
Expiration:	1/25/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
EXAL CORP

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Authorization

Facility ID: 0250110920
Application Number(s): A0044340
Permit Number: P0110001
Permit Description: Initial Installation for a one-piece aluminum can extrusion and coating process; emissions vented to a catalytic oxidizer
Permit Type: Initial Installation
Permit Fee: $200.00
Issue Date: 6/28/2012
Effective Date: 6/28/2012
Expiration Date: 1/25/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

EXAL CORP
ONE PERFORMANCE PL
YOUNGSTOWN, OH 44502

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0110001
Permit Description: Initial Installation for a one-piece aluminum can extrusion and coating process; emissions vented to a catalytic oxidizer

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

Emissions Unit ID:	**K016**
Company Equipment ID:	Can Line #15
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K016, Can Line #15

Operations, Property and/or Equipment Description:

One piece aluminum can extrusion and coating; emissions vented to catalytic oxidizer

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

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

a. None.

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

a. d)(8), d)(9), d)(10), d)(11) and e)(5)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 6.35 lbs/hr from all coatings and clean-up materials. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). See b)(2)a.
b.	OAC rule 3745-31-05(F) Voluntary restriction to align requirements with permits for other units. These requirements are similar to, but more stringent than OAC requirements.	VOC emissions shall not exceed 19.0 tons/year from all coatings and clean-up materials. See b)(2)b, b)(2)c and b)(2)d.
c.	OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(D)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V, MACT and PSD.	Facility-wide* VOC emissions from all coatings and cleanup materials shall not exceed 97.0 tons per rolling, 12-month period. See b)(2)e and b)(2)f.
e.	ORC 3704.03(F)(4)(c)	See d)(8), d)(9), d)(10), d)(11) and e)(5).

(2) Additional Terms and Conditions

a. The hourly VOC emissions limit was established to reflect the potential to emit (PTE) for this emissions unit using the maximum coating usage (gal/ 1000 cans), maximum production rate (cans/minute) and a 90% overall control efficiency. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emission limitation.

b. All of the VOC emissions from this emissions unit shall be vented to a catalytic incinerator that shall meet the operational, monitoring and record keeping requirements of this permit, when the emissions unit is in operation.

c. The permittee shall maintain an overall VOC removal efficiency that is at least 90%, by weight, and a control device removal efficiency that is at least 92%, by weight.

d. Overspray from the interior body spray booth shall be captured by a fabric filter.

e. The maximum annual VOC emissions for this facility* shall not exceed 97.0tons, based upon a rolling, 12-monthsummation of VOC emissions. The maximum annual HAP emissions for this facility* shall not exceed 9.9 tons of any individual HAP and 24.9 tons of total combined HAPs, based upon a rolling, 12-month summation of HAP emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Emissions, tons/month		
	VOC	Individual HAP	Total Combined HAPs
1	8.08	0.83	2.08
1-2	16.17	1.65	4.15
1-3	24.25	2.48	6.23
1-4	32.33	3.3	8.3
1-5	40.42	4.13	10.38
1-6	48.50	4.95	12.45
1-7	56.58	5.78	14.53

1-8	64.66	6.6	16.6
1-9	72.75	7.43	18.68
1-10	80.83	8.25	20.75
1-11	88.91	9.08	22.83
1-12	97.0	9.9	24.9

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

*The facility includes the following emissions units: K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K014, K015 and K016.

c) Operational Restrictions

(1) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The conversion efficiency of the catalyst, as determined in anannual catalyst activity test, shall be sufficient to meet the control device removal efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. The acceptable average temperature difference across the catalyst bed, for any 3-hour block of time (when the emissions unit(s) is/are in operation), shall not be less than 80% of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1% of the temperature being measured or ± 5° F, whichever is greater. The temperature monitors and recorder(s) 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 record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed. These records shall be maintained at the facility for a period of no less than 3 years.

(3) The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.

The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

(4) Whenever the monitored average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s)/limit(s) specified in this permit, 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:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature of the exhaust gases immediately before the catalyst and the average temperature difference across the catalyst bed immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted temperature range(s) based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) of the controlled pollutant(s). In addition, approved revisions to the temperature range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(5) The permittee shall collect and record the following information each month for this emissions unit:

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

b. the VOC content of each coating and cleanup material, as applied, in lbs/gal;

c. the amount each coating and cleanup material (fresh clean up material minus the amount of cleanup recovered for disposal) employed, in gallons;

d. for each coating and cleanup material, the uncontrolled VOC emitted, [d)(5)b x d)(5)c x (1 ton/2000 lbs)], in tons/month;

e. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, [summation of monthly emissions in d)(5)d], in tons/month;

f. the total controlled VOC emissions from all coatings and cleanup material employed, calculated by multiplying the uncontrolled VOC emissions by 1 minus the overall control efficiency of the catalytic incinerator [as determined by the most recent emission test that demonstrated that the emissions unit was in compliance], in tons/month; and

g. the total annual controlled VOC emissions from all coatings and clean-up materials, [summation of monthly VOC emissions in d)(5)f], in tons/year.

(6) The permittee shall maintain monthly records of the following information for all emissions units at the facility:

a. the total uncontrolled VOC emissions during the rolling, 12-month period, i.e., the summation of the VOC emissions, as recorded in d)(5)d above, for the present month plus the previous 11 months of operation, for each emissions unit, in tons; and

b. the total controlled VOC emissions during the rolling, 12-month period, i.e., the summation of the VOC emissions, as recorded in d)(5)f above, for the present month plus the previous 11 months of operation, for each emissions unit, in tons.

(7) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)[1] that are applied at the facility:

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

b. the name/identification of each individual HAP contained in each material applied (and identified in d)(7)a above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

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

d. for each individual HAP, the total uncontrolled emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(7)b times d)(7)c for all the materials applied during the month, divided by 2,000 pounds;

e. the uncontrolled total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(7)d above;

f. for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in d)(7)d above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;

g. the calculated, controlled total combined HAPs emission rate for all the materials employed, in ton(s), i.e., the uncontrolled total combined HAPs emission rate, calculated in d)(7)e above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;

h. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(7)f above, for the present month plus the previous 11 months of operation, in ton(s); and

i. the total combined HAP emissions during the rolling, 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(7)g 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 Ohio EPA Northeast District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean-up materials.

(8) The FEPTIO application for this/these emissions unit(s), K016, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours/day and **Y** days/week, from that of 8 hours/day and 5 days/week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Xylene
TLV (mg/m3): 434.19
Maximum Hourly Emission Rate (lbs/hr): 0.61
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 30.15
MAGLC (ug/m3): 10337.91

The permittee, has demonstrated that emissions of Xylene, from emissions unit(s) K016, are calculated to be less than 80% of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC

3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

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

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

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

i. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed was outside of the acceptable ranges;

ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the catalytic incinerator;

iii. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit;

iv. all exceedances of the rolling, 12-month HAP emission limitations for individual and total combined HAPs; and

v. during the first 12 calendar months of operation, all exceedances of the cumulative monthly VOC, individual HAP and total combined HAP emission limitations;

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

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

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

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

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

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual PER the following information concerning the operations of the catalytic incinerator during the 12-month reporting period for this emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed was outside of the acceptable ranges;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the catalytic incinerator;

c. each incident of deviation described in 'a' or "b" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in 'a' or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed into compliance with the acceptable range(s), was determined to be necessary and was not taken;

e. each incident of deviation described in 'a' or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit; and

f. the results of any catalyst activity test(s) along with a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator.

(5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum groundlevel concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

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

VOC emissions shall not exceed 6.35 lbs/hr from all coatings and clean-up materials.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated in accordance with the emission testing procedures specified in f)(4).

b. <u>Emission Limitation</u>:

VOC emissions shall not exceed 19.0 tons/year from all coatings and clean-up materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

c. Emission Limitation:

The permittee shall maintain an overall VOC removal efficiency that is at least 90%, by weight, and a control device removal efficiency that is at least 92%, by weight.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the emission testing procedures specified in f)(4).

d. Emission Limitation:

Facility-wide VOC emissions from all coatings and cleanup materials shall not exceed 97.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5) and d)(6).

e. Emission Limitation:

The maximum annual HAP emissions for this facility* shall not exceed 9.9 tons of any individual HAP and 24.9 tons of total combined HAPs, based upon a rolling, 12-month summation of HAP emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(7).

(2) Formulation data or US EPA Method 24 or 24A shall be used to determine the VOC content of the coatings and clean up materials.

(3) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in this permit. An intent to test notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.

(4) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit

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

c. Methods 1 through 4, and Method 25 or 25A of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for VOC.

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

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 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.

f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

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

h. Personnel from the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

g) Miscellaneous Requirements

(1) Prior to coating beverage cans (as defined in 40 CFR Part 60, Subpart WW), the permittee shall apply for and obtain an Ohio EPA permit to install and operate.

40 CFR Part 60, Subpart WW (60.491) defines “beverage cans” as:

*“*any two-piece steel or aluminum container in which soft drinks or beer, including malt liquor, are packaged. The definition does not include containers in which fruit or vegetable juices are packaged.”