

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **03-17111**

A. Source Description

Silgan Can Company manufactures steel cans and ends for subsequent sale to both on-site (Campbell Soup Company) and off-site customers for food manufacturing. Five types of processes are utilized in the manufacturing of cans at the Napoleon plant: a Drawn and Ironed two-piece process, a three-piece can assembly process, an end manufacturing process, a sheet coating operation and a coil shearing operation.

The purpose of this application is to request enforceable permit language to limit facility-wide emissions of 1) VOCs to less than 250 tons per year, 2) HAPs to less than 10 tons per year for any single HAP, and 3) HAPs to less than 25 tons per year for any combination of HAPs. This permit will also combine previously issued individual process and line construction permits into a single permit. This application does not involve installation of new emissions units or modification of any existing units.

B. Facility Emissions and Attainment Status

The Napoleon plant is a minor source as defined in paragraph (KKK)(2)(b) of rule 3745-31-01 of the Ohio Administrative Code because site-wide potential to emit Volatile Organic Compounds (VOC) is less than two hundred fifty tons per year. Additionally, the plant's site-wide potential to emit HAPs is less than 10 tons per year for any single HAP and less than 25 tons per year for all HAPs combined. The plant therefore will not need to change any of its current practices to avoid PSD major levels, or to avoid having to comply with the MACT (40 CFR Part 63 Subpart KKKK). The plant only needs appropriate language in its permit to enforce its current practices.

C. Source Emissions

The potential VOC emissions from units K005, K006, K008-17, K019-24, and K026-28 combined are 192.16 tons/year for VOC, and 23.89 tons/year for all HAPs. The greatest potential to emit for any single HAP is 1.12 tons/year (from each of units K011, K013 and K014). Units K005, K006, K008-17, K019-24, and K026-28 also have combined potentials to emit of 5.02 tons/year for PM, 0.22 tons per year for SO₂, 36.13 tons per year for NO_x, and 30.35 tons per year for CO.

D. Conclusion

As a result of the federally enforceable emission limitations of this permit, the facility will avoid PSD major levels, and MACT (40 CFR Part 63 Subpart KKKK) requirements, without having to alter any of its current practices.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
HENRY COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 03-17111

Fac ID: 0335010053

DATE: 8/31/2006

Silgan Can Company
D. Michael Huff
PO Box 40
Paris, TX 75461

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$4200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

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HENRY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17111 FOR AN AIR CONTAMINANT SOURCE FOR
Silgan Can Company**

On 8/31/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Silgan Can Company**, located at **P.O. Box 29, Napoleon, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17111:

Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402
[(419)352-8461]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-17111

Application Number: 03-17111
Facility ID: 0335010053
Permit Fee: **To be entered upon final issuance**
Name of Facility: Silgan Can Company
Person to Contact: D. Michael Huff
Address: PO Box 40
Paris, TX 75461

Location of proposed air contaminant source(s) [emissions unit(s)]:

**P.O. Box 29
Napoleon, Ohio**

Description of proposed emissions unit(s):

Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Silgan Can Company

PTI Application: 03-17111

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0335010053

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

Silgan Can Company

PTI Application: 03-17111

Issued: To be entered upon final issuance

Facility ID: 0335010053

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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then 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 are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain,

Silgan Can Company
PTI Application: 03-17111

Facility ID: 0335010053

Issued: To be entered upon final issuance

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.

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- 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, revoked, or revoked and reissued, for cause. 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 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.

7. Fees

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

8

Silgan Can Company

Facility ID: 0335010053

PTI Application: 03-17111

Issued: To be entered upon final issuance

permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

Silgan Can Company
PTI Application: 03-17111
Issued: To be entered upon final issuance

Facility ID: 0335010053

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or

Silgan Can Company**Facility ID: 0335010053****PTI Application: 03-17111****Issued: To be entered upon final issuance**

more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or

11

Silgan Can Company

Facility ID: 0335010053

PTI Application: 03-17111

Issued: To be entered upon final issuance

"modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

Silgan Can Company
PTI Application: 03-17111
Issued: To be entered upon final issuance

Facility ID: 0335010053

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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.)

3. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of

Silgan Can Company**Facility ID: 0335010053****PTI Application: 03-17111****Issued: To be entered upon final issuance**

the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

Silgan Can Company

PTI Application: 03-17111

Issued: To be entered upon final issuance

Facility ID: 0335010053

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Silgan Can Company**PTI Application: 03-17111****Issued: To be entered upon final issuance****Facility ID: 0335010053****C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	249.5
Individual HAP	9.90
Combined HAPs	24.90

Silgan Can Company

PTI Application: 03-17111

Issued: To be entered upon final issuance

Facility ID: 0335010053

Silgan Can Company

DTI Application: 03 17111

Facility ID: 0335010053

Emissions Unit ID: K005

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K005) - Sheet Coating Line No. 1, with Thermal Incinerator

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28, combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Issued: To be entered upon final issuance

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

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

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

Issued: To be entered upon final issuance

- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i , R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i ;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating line and control equipment:
- a. The name and identification number of each coating employed.

Emissions Unit ID: K005

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

Issued: To be entered upon final issuance

- a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed (A.III.3.b x A.III.3.c) for each individual HAP, in pounds;
 - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of A.III.3.d for all coatings and cleanup materials), in pounds;
 - f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of A.III.3.e for all HAPs for all coatings and cleanup materials), in pounds;
 - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
4. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

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

Emissions Unit ID: K005

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

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

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
 - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
 - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit,

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all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28 , combined).

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

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 4.5 lbs VOC/gallon of coating solids

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

Emissions Unit ID: K005

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

the cumulative monthly HAP emissions (see section 2.a)

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

- c. Emission Limitation:
The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II.2)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K005) - Sheet Coating Line No. 1, with Thermal Incinerator

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: K005

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K006) - Sheet Coating Line No. 2, with Thermal Incinerator

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Silgan Can Company

DTI Application: 03 17111

Facility ID: 0335010053

Emissions Unit ID: K006

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

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Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

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

;

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

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- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ <p>is less than or equal to</p>
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. The name and identification number of each coating employed.
 - b. The pounds of VOC per gallon of coating solids, as applied, the volume solids

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

Emissions Unit ID: K006

issuance of this permit, the rolling, 12-month VOC emission rates, in tons.

3. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) where no control system is employed, in pounds;
 - e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
 - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
 - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
 - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.
4. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value

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

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

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

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for

Emissions Unit ID: K006

emissions units K005, K006, K008-17, K019-24, and K026-28 combined.

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

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

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:

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

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

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

the cumulative monthly HAP emissions (see section 2.a)

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

Silgan Can Company

DTL Application: 02 17111

Facility ID: 0335010053

Emissions Unit ID: K006

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II.2)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K006) - Sheet Coating Line No. 2, with Thermal Incinerator

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K008) - Side Seam Coater - Welded Line V8

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

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

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

Emissions Unit ID: K008

$$\sum_{i=1}^n \left[\sum_{j=1}^M V_i G_j \{1 - ((R_i) \times (K/100))\} \right] \div 2000 \text{ lbs/ton} \leq 249.5$$

where,

- M = the increment of the rolling 12-month period;
- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n \left[\sum_{j=1}^M V_i G_j \{1 - ((R_i) \times (K/100))\} \right] \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

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III. Monitoring and/or Record keeping Requirements

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

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

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleaning material employed;
 - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
 - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

Emissions Unit ID: K008

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
 - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
 - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28 , combined).

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record

Emissions Unit ID: K008

keeping requirements specified in section A. III.1 of this permit.

- b. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

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

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

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

where:

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

CE = control efficiency of the control equipment

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

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

Applicable Compliance Method:

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

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

the cumulative monthly HAP emissions (see section 2.a)

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

- e. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

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the cumulative monthly VOC emissions (see section II.3)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K008) - Side Seam Coater - Welded Line V8

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K009) - Side Seam Coater - Welded Line No. 2

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

Emissions Unit ID: K009

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

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

- 1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- 2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

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

M=1 i=1

where,

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

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- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- ;
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i , R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i ;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n \left[\frac{V_i G_i}{1 - ((R_i) \times (K/100))} \right] \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

Issued: To be entered upon final issuance**III. Monitoring and/or Record keeping Requirements**

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

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

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleaning material employed;
 - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
 - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

Emissions Unit ID: K009

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

Emissions Unit ID: K009

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
 - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
 - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28 , combined).

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

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

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- b. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

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

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

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

where:

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

CE = control efficiency of the control equipment

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

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

Applicable Compliance Method:

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

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

the cumulative monthly HAP emissions (see section 2.a)

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

Emissions Unit ID: K009

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- e. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II.3)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Emissions Unit ID: K009

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K009) - Side Seam Coater - Welded Line No. 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K010) - Drawn and Ironed 2-Piece Food Can Line (Main Plant), with Thermal Oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	223.92 lbs volatile organic compounds (VOC) day (including cleanup materials) 1.74 lbs nitrogen oxides (NOx) hr See A.II 1 The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(D)(1)(b)&(c), 3745-17-11(B) and 3745-17-07(A). The requirements of this rule were established in PTI 03-6720.
OAC rule 3745-21-09(D)(1)(b)	4.5 lbs VOC/gallon of coating solids (for overvarnish coatings)
OAC rule 3745-21-09(D)(1)(c)	9.8 lbs VOC/gallon of coating solids (for interior body coatings)
OAC rule 3745-17-11(B)	0.98 lb particulate emissions (PE)/hr
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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

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

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48

Emissions Unit ID: K010

1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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

II. Operational Restrictions

- The maximum annual number of hours of operation for this emissions unit shall not exceed 8,400 hours, based upon a rolling, 365-day summation of the daily numbers of operating hours.
- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

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

where,

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

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

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G_i = gallons used of each coating and cleanup material;

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

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

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

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Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i + G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of

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the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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

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

2. The permittee shall record and maintain each day the following information for this emissions unit:
 - a. the number of hours the emissions unit was in operation; and
 - b. the rolling, 365-day summation of the daily numbers of hours in operation.
3. The permittee shall collect and record the following information each day for the overvarnish coating operation associated with this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

Emissions Unit ID: K010

- e. the uncontrolled amount of VOCs emitted from each coating employed (this is calculated, for each coating, by multiplying the lbs of VOC/gallon of solids by the volume solids content, and then multiplying by the number of gallons of each coating), in pounds;
 - f. the uncontrolled amount of VOC emitted from all the coatings employed (summation of 2.e for all coatings), in pounds; and
 - g. the calculated, controlled VOC emissions, in tons [3.f x (1 - the overall control efficiency of the thermal oxidizer as determined during the most recent compliance test that demonstrated the emissions unit was in compliance) divided by 2000].
4. The permittee shall collect and record the following information each day for the interior body coating operation associated with this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
 - e. the uncontrolled amount of VOCs emitted from each coating employed (this is calculated, for each coating, by multiplying the lbs of VOC/gallon of solids by the volume solids content, and then multiplying by the number of gallons of each coating), in pounds;
 - f. the uncontrolled amount of VOC emitted from all the coatings employed (summation of 4.e for all coatings), in pounds; and
 - g. the calculated, controlled VOC emissions, in tons [4.f x (1 - the overall control efficiency of the thermal oxidizer as determined during the most recent compliance test that demonstrated the emissions unit was in compliance) divided by 2000].

Emissions Unit ID: K010

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

total VOC emissions (lbs/day) = VOC emissions from section 3.g + VOC emissions from section 4.g + VOC emissions from section 5.e
7. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleaning material employed;
 - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.7.b x A.III.7.c);
 - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.7.b and A.III.7.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - f. The total VOC emission rate from all coatings and cleanup materials employed

Emissions Unit ID: K010

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

IV. Reporting Requirements

Emissions Unit ID: K010

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

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

2. The rule shall notify the director of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitations. A copy of such record shall be sent to the director within forty-five days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
 - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.3.
 - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.b.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28 , combined).

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

4. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in

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compliance.

- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission limitation: 223.92 lbs VOC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in A.III. 3, 4, 5 and 6 of this permit.
 - b. Emission Limitation: 9.8 lbs VOC/gallon of coating solids (for interior body coatings)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.
 - c. Emission Limitation: 4.5 lbs VOC/gallon of coating solids (for overvarnish coatings)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.
 - d. Emission Limitation: 1.74 lbs NOx/hour

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Applicable Compliance Method: Compliance with the hourly limitation above may be determined by multiplying the maximum natural gas consumption rate (mm cu. ft/hr) by the AP-42, Table 1.4-1 (revised 1/95) emission factor of 100 lbs NOx/mm cu.ft. of natural gas.

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

- e. Emission Limitation: 0.98 lb PE/hr

Applicable Compliance Method:

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

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

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

where:

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

CE = control efficiency of the control equipment

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

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

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

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

Emissions Unit ID: K010

the cumulative monthly HAP emissions (see section 2.a)

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

- h. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K010) - Drawn and Ironed 2-Piece Food Can Line (Main Plant), with Thermal Oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Emissions Unit ID: K010

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K011) - Side Seam Coater - Welded Line No. 6

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

2. Additional Terms and Conditions

Emissions Unit ID: K011

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

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

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

where,

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

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

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

G_i = gallons used of each coating and cleanup material;

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

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

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

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Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ <p>is less than or equal to</p>
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

Emissions Unit ID: K011

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleaning material employed;
 - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
 - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;
 - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
 - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emission rates, in tons.
4. The permittee shall collect and record the following HAP information each month for emissions units K005, K006, K008-17, K019-24, and K026-28, combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating and cleanup

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- material employed (b x c) where no control system is employed, in pounds;
- e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
 - g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
 - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
 - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly VOC limitation of 1,850 pounds. All of the quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy

Emissions Unit ID: K011

of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 1,850 lbs VOC/month

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - c. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be

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used for the paint spraying operations.

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

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

where:

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

CE = control efficiency of the control equipment

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

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

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

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

the cumulative monthly HAP emissions (see section 2.a)

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

- f. **Emission Limitation:** The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

Silgan Can Company

DTI Application: 03 17111

Facility ID: 0335010053

Emissions Unit ID: K011

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

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K011) - Side Seam Coater - Welded Line No. 6

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K012) - Side Seam Coater - Welded Line No. 7

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

2. Additional Terms and Conditions

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

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

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

where,

- M = the increment of the rolling 12-month period;
- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i \{1 - ((R_i) \times (K/100))\}] \div 2000$ is less than or equal to
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1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - 1.a the name and identification number of each coating and cleanup material employed, as applied;
 - 1.b the VOC content of each coating employed (in lbs/gallon, excluding water and exempt solvents), as applied;
 - 1.c the VOC content of each coating and cleanup material employed, in pounds per gallon, as applied;
 - 1.d the volume, in gallons, of each coating and cleanup material employed;
 - 1.e the amount of VOC emitted from each coating employed (1.c x 1.d), in pounds;
 - 1.f the amount of VOC emitted from each cleanup material employed (1.c x 1.d), in pounds; and
 - 1.g the amount of VOC emitted from all the coatings and cleanup materials employed [(summation of 1.e)] for all coatings + (summation of 1.f) for all cleanup materials], in pounds.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17,

Issued: To be entered upon final issuance

K019-24, and K026-28 combined:

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

Emissions Unit ID: K012

material employed (b x c) where no control system is employed, in pounds;

- e. the calculated, controlled individual HAP emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled HAP emission rate shall be calculated using the information in b and c above and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
- f. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d and e for all coatings and cleanup materials), in pounds;
- g. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of f for all HAPs for all coatings and cleanup materials), in pounds;
- h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and for all HAPs, combined, in tons; and
- i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and of all HAPs combined, in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly VOC limitation of 1,850 pounds. All of the quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 1,850 lbs VOC/month

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - c. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be

Emissions Unit ID: K012

used for the paint spraying operations.

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

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

where:

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

CE = control efficiency of the control equipment

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

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

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

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

the cumulative monthly HAP emissions (see section 2.a)

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

- f. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

Emissions Unit ID: K012

Issued: To be entered upon final issuance
coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K012) - Side Seam Coater - Welded Line No. 7

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K013) - Side Seam Coater - Welded Line No. 4

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling,

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12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

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

where,

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- M = the increment of the rolling 12-month period;
- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\frac{M}{1} \sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ <p>is less than or equal to</p>
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleaning material employed;
 - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed (A.III.3.b x A.III.3.c);
 - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - f. The total VOC emission rate from all coatings and cleanup materials employed (summation of A.III.3.d and A.III.3.e for all coatings and cleanup materials), in pounds or tons;

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
 - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
 - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28 , combined).

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record

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keeping requirements specified in section A. III.1 of this permit.

- b. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

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

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

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

where:

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

CE = control efficiency of the control equipment

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

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

Applicable Compliance Method:

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

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

the cumulative monthly HAP emissions (see section 2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the

Emissions Unit ID: K013

record keeping requirements specified in section A.III of this permit.

- e. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

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VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K013) - Side Seam Coater - Welded Line No. 4

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K014) - Side Seam Coater - Welded Line No. 3

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).

Issued: To be entered upon final issuance

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

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The maximum rolling, 12-month coating and cleanup material usage for emissions units K005, K006, K008-17, K019-24, and K026-28 combined is limited by the following equation:

Emissions Unit ID: K014

$$\sum_{i=1}^n \left[\sum_{j=1}^M V_i G_j \{1 - ((R_i) \times (K/100))\} \right] \div 2000 \text{ lbs/ton} \leq 249.5$$

where,

- M = the increment of the rolling 12-month period;
- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n \left[\sum_{j=1}^M V_i G_j \{1 - ((R_i) \times (K/100))\} \right] \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

Issued: To be entered upon final issuance

III. Monitoring and/or Record keeping Requirements

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

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

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for all the coatings and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28 combined:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleaning material employed;
 - d. the VOC emission rate, in pounds, for each coating and cleanup material used where no control is employed ($A.III.3.b \times A.III.3.c$);
 - e. the calculated, controlled VOC emission rate, in pounds, for each coating and cleanup material used where a control system is employed. The controlled VOC emission rate shall be calculated using the information in A.III.3.b and A.III.3.c and applying the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

Emissions Unit ID: K014

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
 - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage rates specified in section A.II.1.
 - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K005, K006, K008-17, K019-24, and K026-28 combined).
 - d. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.I.2.a.ii (for emissions units K005, K006, K008-17, K019-24, and K026-28 , combined).

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping

Emissions Unit ID: K014

requirements specified in section A. III.1 of this permit.

- b. Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method:

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

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

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

where:

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

CE = control efficiency of the control equipment

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

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

Applicable Compliance Method:

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

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

the cumulative monthly HAP emissions (see section 2.a)

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

- e. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

Issued: To be entered upon final issuance

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K014) - Side Seam Coater - Welded Line No. 3

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K015) - Can End Sealing Liner - End Press No. 1

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Silgan Can Company

DTI Application: 02 17111

Facility ID: 0335010053

Emissions Unit ID: K015

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

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Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

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

;

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

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- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ <p>is less than or equal to</p>
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

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

Emissions Unit ID: K015

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. **Emission Limitation:** Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Emissions Unit ID: K015

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K015) - Can End Sealing Liner - End Press No. 1

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K016) - Can End Sealing Liner - End Press No. 2

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Silgan Can Company

DTI Application: 03 17111

Facility ID: 0335010053

Emissions Unit ID: K016

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

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Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

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

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

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- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i , R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i ;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

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

Emissions Unit ID: K016

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Issued: To be entered upon final issuance

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Emissions Unit ID: K016

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K016) - Can End Sealing Liner - End Press No. 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K017) - Can End Sealing Liner - End Press No. 3

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Silgan Can Company

DTI Application: 02 17111

Facility ID: 0335010053

Emissions Unit ID: K017

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

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Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

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

;

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

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- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ <p>is less than or equal to</p>
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

Issued: To be entered upon final issuance

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

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

Emissions Unit ID: K017

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Issued: To be entered upon final issuance

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. **Emission Limitation:** Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Silgan Can Company

DTI Application: 02-17111

Facility ID: 0335010053

Emissions Unit ID: K017

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K017) - Can End Sealing Liner - End Press No. 3

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K019) - Can End Sealing Liner - End Press No. 5

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Silgan Can Company

DTI Application: 02 17111

Facility ID: 0335010053

Emissions Unit ID: K019

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

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Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

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

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

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- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i , R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i ;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

Issued: To be entered upon final issuance

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

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

Emissions Unit ID: K019

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Issued: To be entered upon final issuance

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Silgan Can Company

DTI Application: 02-17111

Facility ID: 0335010053

Emissions Unit ID: K019

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K019) - Can End Sealing Liner - End Press No. 5

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K020) - Can End Sealing Liner - End Press No. 6

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

Emissions Unit ID: K020

- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

Issued: To be entered upon final issuance

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

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

Emissions Unit ID: K020

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Issued: To be entered upon final issuance

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. **Emission Limitation:** Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Emissions Unit ID: K020

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K020) - Can End Sealing Liner - End Press No. 6

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K021) - Can End Sealing Liner - End Press No. 7

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Issued: To be entered upon final issuance

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

Emissions Unit ID: K021

- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

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

Emissions Unit ID: K021

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Issued: To be entered upon final issuance

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Silgan Can Company

DTI Application: 02-17111

Facility ID: 0335010053

Emissions Unit ID: K021

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K021) - Can End Sealing Liner - End Press No. 7

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K022) - Can End Sealing Liner - End Press No. 8

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

Emissions Unit ID: K022

- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

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

Emissions Unit ID: K022

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Emissions Unit ID: K022

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K022) - Can End Sealing Liner - End Press No. 8

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K023) - Can End Sealing Liner - End Press No. 9

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Emissions Unit ID: K023

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

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Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

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

V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;

Emissions Unit ID: K023

- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i , R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i ;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i] \{1 - ((R_i) \times (K/100))\} \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must

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be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

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

Emissions Unit ID: K023

pounds per gallon, as applied;

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined.
 - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative coating and cleanup

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material usage rates specified in section A.II.1.

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

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

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
 - c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Silgan Can Company

DTL Application: 03 17111

Facility ID: 0335010053

Emissions Unit ID: K023

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K023) - Can End Sealing Liner - End Press No. 9

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K024) - Can End Sealing Liner - End Press No. 10

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

Emissions Unit ID: K024

- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i \{1 - ((R_i) \times (K/100))\}] \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

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

Emissions Unit ID: K024

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Issued: To be entered upon final issuance

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. **Emission Limitation:** Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Silgan Can Company

DTI Application: 02-17111

Facility ID: 0335010053

Emissions Unit ID: K024

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K024) - Can End Sealing Liner - End Press No. 10

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K026) - Can End Sealing Liner - End Press No. 12

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

where,

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

Emissions Unit ID: K026

- n = total number of unique coating and cleanup materials employed in emissions units K005, K006, K008-17, K019-24, and K026-28
- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i \{1 - ((R_i) \times (K/100))\}] \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

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

Emissions Unit ID: K026

emissions units K005, K006, K008-17, K019-24, and K026-28, combined:

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Issued: To be entered upon final issuance

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. Emission Limitation: Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

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

Silgan Can Company

DTI Application: 02-17111

Facility ID: 0335010053

Emissions Unit ID: K026

- c. Emission Limitation: The VOC emissions from emissions units K005-6, K008-17, K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K026) - Can End Sealing Liner - End Press No. 12

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K027) - Can End Sealing Liner - End Press No. 13

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

M=1 i=1

where,

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

n = total number of unique coating and cleanup materials employed in

Emissions Unit ID: K027

emissions units K005, K006, K008-17, K019-24, and K026-28

- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i \{1 - ((R_i) \times (K/100))\}] \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

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

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

Emissions Unit ID: K027

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for

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emissions units K005, K006, K008-17, K019-24, and K026-28 combined.

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

 Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. **Emission Limitation:** Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 the cumulative monthly HAP emissions (see section 2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
 - c. **Emission Limitation:** The VOC emissions from emissions units K005-6, K008-17,

Silgan Can Company

DTI Application: 02-17111

Facility ID: 0335010053

Emissions Unit ID: K027

K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K027) - Can End Sealing Liner - End Press No. 13

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K028) - Can End Sealing Liner - End Press No. 14

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

2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of PSD and Maximum Achievable Control Technology (MACT) regulations:
 - i. 249.5 tons of VOC per rolling, 12-month period for emissions units K005, K006, K008-17, K019-24, and K026-28 combined (See A.II.2).
 - ii. Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

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

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

II. Operational Restrictions

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

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

M=1 i=1

where,

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

n = total number of unique coating and cleanup materials employed in

Emissions Unit ID: K028

emissions units K005, K006, K008-17, K019-24, and K026-28

- V_i = VOC content, in pounds per gallon, of each coating and cleanup material employed;
- G_i = gallons used of each coating and cleanup material;
- R_i = a value of 1 (one) when control (i.e. thermal oxidation, etc.) is employed for coating and/or cleanup material usage G_i, R_i equals a value of 0 (zero) when no control is employed for coating/cleanup material usage G_i;
- K = % overall control efficiency of control employed as determined during the most recent performance test

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

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month	$\sum_{i=1}^n [V_i G_i \{1 - ((R_i) \times (K/100))\}] \div 2000$ is less than or equal to
1	50
1-2	100
1-3	150
1-4	200
1-12	249.5

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

III. Monitoring and/or Record keeping Requirements

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

Issued: To be entered upon final issuance

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

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

Emissions Unit ID: K028

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 249.5 tons of VOC per rolling, 12-month period for

Issued: To be entered upon final issuance

emissions units K005, K006, K008-17, K019-24, and K026-28 combined.

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

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 shall be determined in accordance with the following methods:
 - a. **Emission Limitation:** 3.7 lbs VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - b. **Emission Limitation:** Annual HAP emissions from emissions units K005, K006, K008-17, K019-24, and K026-28, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

the cumulative monthly HAP emissions (see section 2.a)

Applicable Compliance Method: Compliance with the annual allowable and cumulative monthly HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III of this permit.
 - c. **Emission Limitation:** The VOC emissions from emissions units K005-6, K008-17,

Silgan Can Company

DTI Application: 02-17444

Facility ID: 0335010053

Emissions Unit ID: K028

K019-24, and K026-28, combined, shall not exceed 249.5 tons per rolling, 12-month period.

the cumulative monthly VOC emissions (see section II)

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K028) - Can End Sealing Liner - End Press No. 14

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

Emissions Unit ID: K028

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-23 EMISSIONS UNIT ID K005
4-02-017-24

EMISSIONS UNIT DESCRIPTION Sheet Coating Line No. 1, with Thermal Incinerator

DATE INSTALLED June 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.43 lbs/hr	1.87		
PM ₁₀	attainment	0.43 lbs/hr	1.87		
Sulfur Dioxide	attainment	0.03 lbs/hr	0.15		
Organic Compounds	attainment	8.53 lbs/hr	7.82	4.5 lbs/gallon coating solids	249.5 tons per rolling 12-month period*
Nitrogen Oxides	attainment	5.61 lbs/hr	24.56		
Carbon Monoxide	attainment	4.71 lbs/hr	20.63		
Total HAPs	attainment	5.92 lbs/hr	2.12	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	2.16 lbs/hr	1.04	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A NESHAP? N/A PSD? N/A OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION	Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT.	CITY/TWP	Napoleon
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NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-23 EMISSIONS UNIT ID K006
 EMISSIONS UNIT DESCRIPTION Sheet Coating Line No. 2, with Thermal Incinerator
 DATE INSTALLED June 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	8.53 lbs/hr	7.82	4.5 lbs/gallon coating solids	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	5.92 lbs/hr	2.12	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	2.16 lbs/hr	1.04	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Napoleon

Emissions Unit ID: K028

SIC CODE 2032 SCC CODE 4-02-017-25 EMISSIONS UNIT ID K008

EMISSIONS UNIT DESCRIPTION Side Seam Coater - Welded Line V8

DATE INSTALLED 1983

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.08 lbs/hr	0.28	0.551 lb/hr	N/A
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	1.97 lbs/hr	7.34	5.5 lbs/gallon coating excluding water & exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.50 lbs/hr	1.87	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.25 lbs/hr	0.94	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A NESHAP? N/A PSD? N/A OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

SIC CODE 2032 SCC CODE 4-02-017-25 EMISSIONS UNIT ID K009

EMISSIONS UNIT DESCRIPTION Side Seam Coater - Welded Line No. 2

DATE INSTALLED 1983

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.08 lbs/hr	0.28	0.551 lbs/hr	N/A
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	1.97	7.34	5.5 lbs/gallon coating excluding water & exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.50 lbs/hr	1.87	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.25 lbs/hr	0.94	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-35 EMISSIONS UNIT ID K010
 EMISSIONS UNIT DESCRIPTION Drawn and Ironed 2-Piece Food Can Line (Main Plant), with Thermal Oxidizer
 DATE INSTALLED 1993

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.30 lbs/hr	1.26	0.98 lbs/hr	
PM ₁₀	attainment	0.20 lbs/hr	0.88		
Sulfur Dioxide	attainment	0.02 lbs/hr	0.07		
Organic Compounds	attainment	6.54 lbs/hr	25.91	223.92 lbs/day (including cleanup materials) 4.5 lbs/gallon coating solids (overvarnish coatings) 9.8 lbs/gallon coating solids (interior body coatings)	249.5 tons per rolling 12-month period*
Nitrogen Oxides	attainment	2.64 lbs/hr	11.57	1.74 lbs/hr	
Carbon Monoxide	attainment	2.22 lbs/hr	9.72		
Total HAPs	attainment	0.35 lbs/hr	1.39	N/A	24.9 tons per rolling 12-month period*

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Napoleon

Emissions Unit ID: K028

Highest Single HAP	attainment	0.21 lbs/hr	0.83	N/A	9.9 tons per rolling 12-month period*
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*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-25 EMISSIONS UNIT ID K011
 EMISSIONS UNIT DESCRIPTION Side Seam Coater - Welded Line No. 6
 DATE INSTALLED 1987

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.09 lbs/hr	0.34	0.551 lbs/hr	
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	2.35 lbs/hr	8.88	1,850 lbs/month (including cleanup materials) 5.5 lbs/gallon coating excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.60 lbs/hr	2.24	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.30 lbs/hr	1.12	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-25 EMISSIONS UNIT ID K012
 EMISSIONS UNIT DESCRIPTION Side Seam Coater - Welded Line No. 7
 DATE INSTALLED 1988

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.08 lbs/hr	0.31	0.551 lbs/hr	N/A
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	2.16 lbs/hr	8.16	1,850 lbs/month (including cleanup materials) 5.5 lbs/gallon coating excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.55 lbs/hr	2.01	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.28 lbs/hr	1.03	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

NE
P1
F/

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT.

CITY/TWP Napoleon

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111

Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-25 EMISSIONS UNIT ID K013
 EMISSIONS UNIT DESCRIPTION Side Seam Coater - Welded Line No. 4
 DATE INSTALLED 1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.09 lbs/hr	0.34	0.551 lbs/hr	N/A
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	2.35 lbs/hr	8.88	5.5 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.60 lbs/hr	2.24	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.30 lbs/hr	1.12	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Napoleon

Emissions Unit ID: K028

SIC CODE 2032 SCC CODE 4-02-017-25 EMISSIONS UNIT ID K014

EMISSIONS UNIT DESCRIPTION Side Seam Coater - Welded Line No. 3

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.09 lbs/hr	0.34	0.551 lbs/hr	N/A
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	2.35 lbs/hr	8.88	5.5 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.60 lbs/hr	2.24	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.30 lbs/hr	1.12	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K015
 EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 1
 DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.93 lbs/hr	7.71	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.33	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.33	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic: Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K016
 EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 2
 DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.93 lbs/hr	7.71	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.33	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.33	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic: Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K017
 EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 3
 DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.93 lbs/hr	7.71	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.33	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.33	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic: Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K019

EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 5

DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.12 lbs/hr	8.83	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.09 lbs/hr	0.91	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.09 lbs/hr	0.91	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NE
P1
F/

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Napoleon

Emissions Unit ID: K028

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K020

EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 6

DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.62 lbs/hr	9.46	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.36	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.36	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K021
 EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 7
 DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.62 lbs/hr	9.46	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.36	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.36	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111

Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic: Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K022
 EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 8
 DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.93 lbs/hr	7.71	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.33	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.33	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic: Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K023

EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 9

DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.93 lbs/hr	7.71	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.33	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.33	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic: Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K024
 EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 10
 DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.93 lbs/hr	7.71	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.33	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.33	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic: Minor application to combine CITY/TWP Nanoleon

Emissions Unit ID: K028

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K026

EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 12

DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.12 lbs/hr	8.83	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.09 lbs/hr	0.91	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.09 lbs/hr	0.91	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

NE
P1
F/

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111 Facility ID: 0335010053

FACILITY NAME Silgan Can Company

FACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Napoleon

Emissions Unit ID: K028

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K027

EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 13

DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.12 lbs/hr	8.83	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.09 lbs/hr	0.91	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.09 lbs/hr	0.91	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

NE
P1
FA

Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

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Emissions Unit ID: K028

FACILITY DESCRIPTION Synthetic Minor application to combine all emission units into 1 PTI and avoid MACT. CITY/TWP Napoleon

SIC CODE 2032 SCC CODE 4-02-017-26 EMISSIONS UNIT ID K028
 EMISSIONS UNIT DESCRIPTION Can End Sealing Liner - End Press No. 14
 DATE INSTALLED 1957

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.62 lbs/hr	9.46	3.7 lbs/gallon coating, excluding water and exempt solvents	249.5 tons per rolling 12-month period*
Nitrogen Oxides					
Carbon Monoxide					
Total HAPs	attainment	0.03 lbs/hr	0.36	N/A	24.9 tons per rolling 12-month period*
Highest Single HAP	attainment	0.03 lbs/hr	0.36	N/A	9.9 tons per rolling 12-month period*

*K005, K006, K008-17, K019-24, and K026-28 combined

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? N/A

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination This permit action does not involve a BAT review.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111

Facility ID: 0335010053

FACILITY NAME Silgan Can CompanyFACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Napoleon

Emissions Unit ID: K028

No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A**TOXIC AIR CONTAMINANTS**

Ohio EPA's air Toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NOIDENTIFY THE AIR CONTAMINANTS: N/A

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Permitting, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information</u> <u>File Name Convention</u> <u>(your PTI # plus this letter)</u>	<u>Hard</u> <u>Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<u>X</u>	0317111c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<u>X</u>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<u>X</u>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<u>X</u>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<u>X</u>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

See Permit Review Form.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **03-17111**

A. Source Description

Silgan Can Company manufactures steel cans and ends for subsequent sale to both on-site (Campbell Soup Company) and off-site customers for food manufacturing. Five types of processes are utilized in the manufacturing of cans at the Napoleon plant: a Drawn and Ironed two-piece process, a three-piece can assembly process, an end manufacturing process, a sheet coating operation and a coil shearing operation.

The purpose of this application is to request enforceable permit language to limit facility-wide

NEW SOURCE REVIEW FORM B

PTI Number: 03-17111

Facility ID: 0335010053

FACILITY NAME Silgan Can CompanyFACILITY DESCRIPTION Synthetic Minor application to combine CITY/TWP Napoleon

Emissions Unit ID: K028

emissions of 1) VOCs to less than 250 tons per year, 2) HAPs to less than 10 tons per year for any single HAP, and 3) HAPs to less than 25 tons per year for any combination of HAPs. This permit will also combine previously issued individual process and line construction permits into a single permit. This application does not involve installation of new emissions units or modification of any existing units.

B. Facility Emissions and Attainment Status

The Napoleon plant is a minor source as defined in paragraph (KKK)(2)(b) of rule 3745-31-01 of the Ohio Administrative Code because site-wide potential to emit Volatile Organic Compounds (VOC) is less than two hundred fifty tons per year. Additionally, the plant's site-wide potential to emit HAPs is less than 10 tons per year for any single HAP and less than 25 tons per year for all HAPs combined. The plant therefore will not need to change any of its current practices to avoid PSD major levels, or to avoid having to comply with the MACT (40 CFR Part 63 Subpart KKKK). The plant only needs appropriate language in its permit to enforce its current practices.

C. Source Emissions

The potential VOC emissions from units K005, K006, K008-17, K019-24, and K026-28 combined are 192.16 tons/year for VOC, and 23.89 tons/year for all HAPs. The greatest potential to emit for any single HAP is 1.12 tons/year (from each of units K011, K013 and K014). Units K005, K006, K008-17, K019-24, and K026-28 also have combined potentials to emit of 5.02 tons/year for PM, 0.22 tons per year for SO₂, 36.13 tons per year for NO_x, and 30.35 tons per year for CO.

D. Conclusion

As a result of the federally enforceable emission limitations of this permit, the facility will avoid PSD major levels, and MACT (40 CFR Part 63 Subpart KKKK) requirements, without having to alter any of its current practices.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	249.5
Individual HAP	9.90
Combined HAPs	24.90