



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/21/2012

Certified Mail

Tim Case
Ball Metal Beverage Container Corporation
9300 West 108 Circle
Broomfield, CO 80021

Facility ID: 0332000023
Permit Number: P0111246
County: Hancock

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

Dear Permit Holder:

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

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

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

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

PUBLIC NOTICE
11/21/2012 Issuance of Draft Air Pollution Title V Permit

Ball Metal Beverage Container Corporation
12340 Township Road 99,
Findlay, OH 45840
Hancock County
FACILITY DESC.: Metal Can Manufacturing
PERMIT #: P0111246
PERMIT TYPE: Renewal
PERMIT DESC: Title V renewal permit for metal can facility.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



Statement of Basis For Air Pollution Title V Permit

Facility ID:	0332000023
Facility Name:	Ball Metal Beverage Container Corporation
Facility Description:	Metal Cans
Facility Address:	12340 Township Road 99, Findlay, OH 45840
Permit #:	P0111246, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s)	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	P0106443, issued 11/02/10 for K001 – Chapter 31 modification to increase capacity of the emissions unit.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes	N/A



to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	
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B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
B.1			Lists Facility-Wide Terms and Conditions that are enforceable under State law only.
B.2	77-07(A)(13)		Lists insignificant emissions units that have one or more applicable requirements.
B.3		40 CFR Part 60 Subpart KKKK	States applicability of 40 CFR Part 63 Subpart KKKK.

C. Emissions Unit Terms and Conditions

<p>Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement</p>															
<p style="text-align: right;">ENF = did noncompliance issues drive the monitoring requirements? R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements</p>															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K001	None	17-11(C)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – Includes the use of a dry particulate filter. M/R – includes maintaining documentation of the operating manuals for the dry particulate filter. Records shall be maintained during any period the dry particulate filter is not in service. Rp – includes quarterly deviation reports for the filter. ET – There are no emission limitations established pursuant to this rule, therefore no



															emissions testing is required.
K002 K003	None	17-11(C)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR – Use of dry filtration system. M and R include daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. A COM is not economically justified. CAM is not currently applicable.</p> <p>ET – There are no emission limitations established pursuant to this rule, therefore no emissions testing is required.</p>
K001 K002	2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an overvarnish coating line	21-09(D)(1)(b)	N	N	N	Y	N	N	Y	N	Y	N	N	N	<p>ET – The M, R &Rp requirements are sufficient to demonstrate compliance.</p>
K001 K002 K003	4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an interior body coating line.	21-09(D)(1)(c)	N	N	N	Y	N	N	Y	N	Y	N	N	N	<p>ET – The M, R &Rp requirements are sufficient to demonstrate compliance.</p>
K001	1.89 lbs of NOx/hour from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	<p>Other – OAC rule 3745-31-05(A)(3) M, R, Rp& ET – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, reporting, or testing is required.</p>
K001	8.28 tons of	N	Y	N	N	N	N	N	N	N	N	N	N	N	<p>Other – OAC rule 3745-31-05(A)(3) M, R &Rp – The limitation is based on the unit's potential to emit, therefore no monitoring,</p>



	NOx/year from natural gas emissions														recordkeeping or reporting is required. ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K001	1.59 lbs of CO/hour from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05(A)(3) M, R, Rp& ET – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, reporting, or testing is required.
K001	6.96 tons of CO/year from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05(A)(3) M, R, Rp – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping or reporting is required. ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K001	184.43 tons of VOC per rolling 52-week period	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05(D) OR – Input equation to calculate the rolling 52-week VOC emissions from the use of coatings, varnishes, inks, cleanup materials, and natural gas to ensure that maximum VOC emissions are equal to or below the rolling limit. ET – The M, R, &Rp requirements are sufficient to demonstrate compliance.
K002	40.72 lbs of VOC/hr (including cleanup materials)	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05(A)(3) ET – The M, R &Rp requirements are sufficient to demonstrate compliance.
K002	145.96 tons of VOC/year (including cleanup materials)	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05(A)(3) ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K002	0.29 lb of PE/hour	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05 OR – Use of dry filtration system. M and R include daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. A COM is not economically justified. CAM is not currently applicable.



															ET – Calculations based on maximum coating solids usage rate, transfer efficiency and control efficiency are sufficient to show compliance.
K002	1.27 tons of PE/year	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05 OR – Use of dry filtration system. M and R include daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. A COM is not economically justified. CAM is not currently applicable. ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K002	Visible PE shall not exceed 0% opacity as a six-minute average	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05 OR – Use of dry filtration system. M and R include daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. A COM is not economically justified. CAM is not currently applicable. ET – The M, R &Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
K002	2.12 lbs of NOx/hr from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05 M, R, Rp& ET – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, reporting or testing is required.
K002	9.29 tons of NOx/year from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05 M, R &Rp – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, or reporting is required. ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K002	0.128 lb of VOC/hour from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05 M, R, Rp& ET – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, or reporting or testing is required.
K002	0.56 ton of VOC/year	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05 M, R &Rp – The limitation is based on the unit's potential to emit, therefore no monitoring,



	from natural gas emissions														recordkeeping, or reporting is required. ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K003	63.10 lbs of VOC/hour (including cleanup materials)	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05(A)(3) ET – the M, R &Rp requirements are sufficient to demonstrate compliance.
K003	196.16 tons of VOC/year (including cleanup materials)	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05(A)(3) ET – Calculations based on the maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K003	1.06 lbs of PE/hour	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05(A)(3) OR – Use of dry filtration system. M and R include daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. A COM is not economically justified. CAM is not currently applicable. ET – Calculations based on maximum coating solids usage rate, transfer efficiency and control efficiency are sufficient to show compliance.
K003	4.60 tons of PE/year	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – OAC rule 3745-31-05(A)(3) OR – Use of dry filtration system. M and R include daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. A COM is not economically justified. CAM is not currently applicable. ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K003	1.08 lbs of NOx/hour from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05(A)(3) M, R, Rp& ET – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, reporting or testing is required.



K003	4.71 tons of NOx/hour from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – 3745-31-05 M, R &Rp – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, or reporting is required. ET – Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K003	0.06 lb of VOC/hour from natural gas emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other – OAC rule 3745-31-05(A)(3) M, R, Rp& ET – The limitation is based on the unit's potential to emit, therefore no monitoring, recordkeeping, reporting or testing is required.
K001 K002	0.89 kilogram of VOC per liter of coating solids, from each two-piece can inside spray coating operation	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – 40 CFR Part 60 Subpart WW ET – The M, R &Rp requirements are sufficient to demonstrate compliance.
K001 K002	0.46 kilogram of VOC per liter of coating solids, from each two-piece can overvarnish coating operation	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other – 40 CFR Part 60 Subpart WW ET – The M, R &Rp requirements are sufficient to demonstrate compliance.
K003	Exempt	N	Y	Y	N	N	N	N	N	N	N	N	N	N	Other – 40 CFR Part 60 Subpart WW ND – This emissions unit is not subject to the requirements of 40 CFR Part 60 Subpart WW because it is a steel food container manufacturing line.



K001 K002	Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	N	Other – 40 CFR Part 63 Subpart KKKK ET – The M, R &Rp requirements are sufficient to demonstrate compliance.
K003	Organic hazardous air pollutants shall not exceed 0.06 kg/liter (0.51 lb/gal) of coating solids during each compliance period	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	N	Other – 40 CFR Part 63 Subpart KKKK ET – The M, R and Rp requirements are sufficient to demonstrate compliance.



DRAFT

Division of Air Pollution Control
Title V Permit
for
Ball Metal Beverage Container Corporation

Facility ID:	0332000023
Permit Number:	P0111246
Permit Type:	Renewal
Issued:	11/21/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Ball Metal Beverage Container Corporation

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Draft Title V Permit
Ball Metal Beverage Container Corporation
Permit Number: P0111246
Facility ID: 0332000023
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0332000023
Facility Description: Metal Cans
Application Number(s): A0045715
Permit Number: P0111246
Permit Description: Title V renewal permit for metal can facility.
Permit Type: Renewal
Issue Date: 11/21/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0107018

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

Ball Metal Beverage Container Corporation
12340 Township Road 99
Findlay, OH 45840

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Title V Permit
Ball Metal Beverage Container Corporation
Permit Number: P0111246
Facility ID: 0332000023
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

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

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

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

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

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive



measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

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

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

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

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

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

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



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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

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

8. Fees

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

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

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.



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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.



- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.



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

14. Permit Shield

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

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

16. Emergencies

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

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

17. Off-Permit Changes

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.



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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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



21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

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

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



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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

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

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



27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

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

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

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

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

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



Draft Title V Permit
Ball Metal Beverage Container Corporation
Permit Number: P0111246
Facility ID: 0332000023
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21:

- B001 – (2) 7.33 mmBtu/hr natural gas-fired boilers
- B003 – (2) 5.23 mmBtu/hr natural gas-fired space heaters
- L001 – cold cleaner 1
- L002 – cold cleaner 2
- L003 – cold cleaner 3
- L004 – cold cleaner 4
- L005 – cold cleaner 5
- L006 – cold cleaner 6
- L007 – cold cleaner 7
- L008 – cold cleaner 8
- L009 – cold cleaner 9
- L010 – cold cleaner 10
- L011 – cold cleaner 11
- L012 – cold cleaner 12
- L013 – cold cleaner 13
- P044 – natural gas 60 kW back-up generator

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart KKKK, National Emission Standards for Hazardous Air Pollutants, Surface Coating of Metal Cans: K001, K002, and K003. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart KKKK. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 5 of 40 CFR Part 63, Subpart KKKK. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart KKKK and Subpart A.

All the requirements of 40 CFR Part 63, Subpart KKKK have been established in the Title V permit for this facility, which will encompass this emissions unit upon reissuance. The applicable sections of 40 CFR Part 63, Subpart KKKK have been cited in the appropriate sections for the non-insignificant emissions units (K001, K002, and K003) subject to this rule. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Northwest District Office.



Draft Title V Permit
Ball Metal Beverage Container Corporation
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C. Emissions Unit Terms and Conditions



1. K001, Can Line 1

Operations, Property and/or Equipment Description:

Two-Piece Aluminum Beverage Container Manufacturing Line (Can Line #1)

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

(1) None

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0106443 issued on 11/02/10)	1.89 lbs of nitrogen oxides (NOx)/hour; 8.28 tons of NOx/year 1.59 lbs of carbon monoxide (CO)/hour; 6.96 tons of CO/year See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 (PTI #P0106443 issued on 11/02/10)	See b)(2)c.
c.	OAC rule 3745-31-05(D)	184.43 tons of volatile organic compounds (VOC)/rolling, 52-week period (see b)(2)e.)
d.	ORC 3704.03(T)	See b)(2)d.
e.	OAC rule 3745-21-09(D)(1)(b)	2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an overvarnish coating line
f.	OAC rule 3745-21-09(D)(1)(c)	4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an interior body coating line
g.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
h.	40 CFR Part 60 Subpart WW	0.46 kilogram of VOC per liter of coating solids from each two-piece can over-varnish coating operation 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation



Draft Title V Permit

Ball Metal Beverage Container Corporation

Permit Number: P0111246

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR Part 63 Subpart KKKK	See 40 CFR Part 63.3490(b) Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period See b)(2)g.
j.	40 CFR 63.1-15 (40 CFR 63.3501)	Table 5 to Subpart KKKK of 40 CFR Part 63 – Applicability of General Provisions to Subpart KKKK shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirement under OAC rule 3745-31-05(A)(3), effective 11/30/01, has been determined to be the establishment of emission limitations in section b)(1)a.

It should be noted that NOx and CO emissions are generated as the products of combustion from the use of natural gas in multiple drying ovens utilized in the can manufacturing line. The use of natural gas in the drying ovens also results in emissions of VOC, sulfur dioxide (SO2), and particulate matter equal to or less than ten microns in diameter (PM10). The potential emissions for all products of combustion are based on a cumulative maximum heat input of 19.3 mmBtu (natural gas) and result in negligible emission quantities of SO2, VOC*, and PM10 and therefore have not been addressed through individual BAT limitations within this permit. It should be noted that the negligible emission quantities were included in the evaluation of the total emission increases that resulted from the proposed project.

*VOC emissions generated from the use of natural gas have been included in the synthetic minor emission limitation established under OAC rule 3745-31-05(D) [see b)(1)c.].

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



December 1, 2006 version of 3745-31-05, the requirements OAC rule 3745-31-05(A)(3), effective 11/30/01 will no longer apply.

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

BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the NO_x and CO emissions from this air contaminant source since the potential to emit for NO_x and CO is each less than 10 tons per year. Additionally the BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to SO₂, VOC, and PM₁₀ emissions associated with natural gas combustion from this emissions unit since the uncontrolled potential to emit for each pollutant is less than 10 tons per year.

Potential emissions for all products of combustion were determined by applying the appropriate natural gas emission factors from AP-42, Table 3.2-3 (07/2000) to a cumulative maximum fuel heat input of 18.90 mmBtu/hr.

- d. The BAT requirements under ORC 3704.03(T) have been determined to be compliance with the rolling, 52-week VOC limitation established under OAC rule 3745-31-05(D).
- e. This permit establishes the following federally enforceable emission limitation for purposes of limiting the potential to emit (PTE) for VOC:
 - i. Annual VOC emissions from emissions units K001 shall not exceed 184.43 tons per rolling, 52-week period [see c)(1)].
- f. The PTE is being restricted such that the emission increase for VOC allowed for in permit P0106443 will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 40 tons per year.

Rolling emission limitations for VOC were initially established in Permit to Install (PTI) #03-13296 issued on 01/15/02, and administratively modified on 09/18/07. Since rolling VOC emission records exist from these previously issued PTIs, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

- g. The emissions limitations established under OAC rule 3745-31-05(A)(3) as effective November 30, 2001, represent the potential to emit of this emissions unit. Therefore, no monitoring, recordkeeping, and/or deviation reporting is necessary to ensure compliance.
- h. The permittee shall comply with the emission limitation for this emissions unit by using one of the following compliance methods below:

40 CFR Part 63.3491(a) – compliant material option

40 CFR Part 63.3491(b) – emission rate without add-on controls option



c) Operational Restrictions

- (1) The maximum rolling, 52-week quantity of VOC containing/emitting materials (coatings, varnishes, inks, cleanup materials, and use of natural gas) employed/utilized in emissions unit is limited by the following equation:

$$\sum_{M=1}^{52n} \left\{ \left(\sum_{i=1}^n [(Vi)(Gi) + (Wi)(Pi)] \right) + (mmCF)(E) \right\} \div 2000 \text{ lbs/ton} \leq 184.43$$

where,

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

Vi = VOC content in pounds per gallon of each material containing VOC (coatings, varnishes, and cleanup material) employed

Gi = gallons used of each material containing VOC (coatings, varnishes, and cleanup material) for the increment period M

Wi = VOC content in weight percent for each ink employed

Pi = pounds of each ink used for the increment period M

n = total number of unique materials containing VOC (coatings, varnishes, cleanup material, inks, etc.) employed in this emissions unit.

mmCF = natural gas usage, in million cubic feet, for the increment period M

E = emission factor for VOC emissions from natural gas combustion in pounds per million cubic feet [AP-42, Table 1.4-2 (7/98)]

A rolling emission limitation for VOC was initially established in Permit to Install (PTI) #03-13296 issued on 01/15/02 (administratively modified on 09/18/07) and, as such, rolling emissions records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. [OAC rule 3745-77-07(A)(1) and PTI #P0106443]

- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee. [OAC rule 3745-77-07(A)(1) and PTI #P0106443]
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be



expeditiously repaired or otherwise returned to these documented operating procedures.
[OAC rule 3745-77-07(A)(1) and PTI #P0106443]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a weekly basis for emissions unit K001:

- a. the name and identification of each VOC containing material (coating, varnish, cleanup material) employed;

the name and identification of each coating should contain information indicating whether the coating is use for overvarnish or internal body coating operations.
- b. the VOC content of each VOC containing material, as applied, in pounds per gallon;
- c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
- d. the number of gallons of each VOC containing material employed;
- e. the VOC emission rate for each VOC containing material, in tons per week [d)(1)b. times d)(1)d. divided by 2000];
- f. the total VOC emission rate for VOC containing material, in tons per week (summation of d)(1)e. for all VOC containing materials employed);
- g. the actual amount of natural gas utilized or the potential natural gas usage in the washer oven, deco oven, and IC oven combined, in million cubic feet;
- h. the VOC emission rate resulting from natural gas combustion, in pounds per week (calculated based on weekly natural gas usage in d)(1)g. and appropriate emission factors from AP-42);
- i. the total VOC emissions from the use of VOC containing materials and natural gas combustion, in tons, per week (summation of d)(1)f. and d)(1)h.);
- j. the rolling, 52-month VOC emission rate, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0106443]

(2) In accordance with 40 CFR 60.493(b), the permittee shall use the following procedures each calendar month to demonstrate compliance with the emission limitations specified in section b)(1)j. The permittee shall determine the VOC content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24 of 40 CFR Part 60, Appendix A.



- a. Calculate the volume-weighted average for the total mass of VOC per volume of coating solids used during the month for each affected facility, except as provided under paragraph (b)(1)(iv) of 40 CFR 60.493. The volume-weighted average of the total mass of VOC per volume of coating solids used each calendar month will be determined by the following procedures:
 - i. Calculate the mass of VOC used during the calendar month by using Equation (1) in 40 CFR 60.493(b)(1)(i)(A).
 - ii. Calculate the total volume of solids used in the calendar month by using Equation (2) in 40 CFR 60.493(b)(1)(i)(B).
 - iii. Calculate the volume-weighted average mass of VOC per volume of solids used during the calendar month by using Equation (3) in 40 CFR 60.493(b)(1)(i)(C).
 - iv. Calculate the volume-weighted average of VOC emissions discharged to the atmosphere during the calendar month by using Equation (4) in 40 CFR 60.493(b)(1)(ii).
 - b. If each individual coating has a VOC content equal to or less than the limit specified in section b)(1)j., the emissions unit is in compliance provided no VOC solvents are added to the coating during distribution or application. [40 CFR 60.493(b)(1)(iv), PTI #P0106443, and OAC rule 3745-77-07(C)(1)]
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Northwest District Office upon request. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]
 - (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

In the absence of adequate manufacturer's recommendations, instructions, or operating manuals, the permittee shall develop its own guidance for inspections. The permittee shall maintain a copy of the recommended inspection frequency and have it available for Ohio EPA inspection upon request. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]
 - (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]



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

[OAC rule 3745-77-07(C)(1) and PTI #P0106443]

- (7) These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Northwest District Office upon request. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

- (9) The permittee shall comply with the applicable monitoring and recordkeeping requirements as per 40 CFR Part 63, Subpart KKKK, including the following sections:

- a. A copy of each notification and report that you submitted to comply with this subpart and the documentation supporting each notification and report. [40 CFR 63.3512(a)]
- b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating and thinner and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.3512(b)]
- c. A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option. [40 CFR 63.3512(c)(1)]
- d. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of 63.3521. [40 CFR 63.3512(c)(2)]
- e. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings and thinners used



each month, using Equations 1, 1A through C, and 2 of 63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 63.3531(e)(3); the calculation of the total volume of coating solids used each month, using Equation 2 of 63.3531; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 63.3531, or Equation 4 of 63.3531, if applicable. [40 CFR 63.3512(c)(3)]

- f. A record of the name and volume of each coating and thinner used during each compliance period. [40 CFR 63.3512(d)]
- g. A record of the mass fraction of organic HAP for each coating and thinner used during each compliance period. [40 CFR 63.3512(e)]
- h. A record of the volume fraction of coating solids for each coating used during each compliance period. [40 CFR 63.3512(f)]
- i. A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner used during each compliance period. [40 CFR 63.3512(g)]
- j. If you use an allowance in Equation 1 of 63.3531 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, or disposal facility (TSDF) according to 63.3531(e)(3) or otherwise managed in accordance with applicable Federal and State waste management regulations, you must keep the following records of the information specified in paragraphs (h)(1) through (3) of 40 CFR 63.3512:
 - i. The name and address of each TSDF or other applicable waste management location to which you sent waste materials for which you use an allowance in Equation 1 of 63.3531, a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility and the date of each shipment. [40 CFR 63.3512(h)(1)]
 - ii. Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of 63.3531. [40 CFR 63.3512(h)(2)]
 - iii. The methodology used in accordance with 63.3531(e)(3) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF or other applicable waste management location each month and the methodology to determine the mass of organic HAP contained in these waste materials. That must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [40 CFR 63.3512(h)(3)]



- k. You must keep records of the date, time, and duration of each deviation. [40 CFR 63.3512(i)]
- l. Your records must be kept in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR 63.3513(a)]
- m. As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.3513(b)]
- n. You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b). You may keep the records off site for the remaining 3 years. [40 CFR 63.3513(c)]

[OAC rule 3745-77-07(C)(1), PTI #P0106443, and 40 CFR Part 63 Subpart KKKK]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]
- (2) The permittee shall notify the Northwest District Office in writing of any record showing the use of noncomplying coatings and/or deviations of the emission limitations specified in section b)(1). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of each calendar month. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 52-week emission limitation for VOC. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]
- (4) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as required pursuant to 40 CFR Part 63, Subpart KKKK, per the following section:

40 CFR 63.3511(a) – semiannual compliance report

[OAC rule 3745-77-01(C)(1), PTI #P0106443, and 40 CFR Part 63 Subpart KKKK]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation
184.43 tons of VOC per rolling, 52-week period.



Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(1) of the terms and conditions of this permit. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

b. Emission Limitation

2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an overvarnish coating line

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(1) of the terms and conditions of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

c. Emission Limitation

0.46 kilogram of VOC per liter of coating solids from each two-piece can overvarnish coating operation

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(2) of these terms and conditions. [OAC rule 3745-77-07(C)(1), PTI #P0106443, and 40 CFR Part 60 Subpart WW]

d. Emission Limitation

4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an interior body coating line

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(1) of the terms and conditions of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

e. Emission Limitation

0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray operation

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(2) of these terms and conditions. [OAC rule 3745-77-01(C)(1), PTI #P0106443, and 40 CFR Part 60 Subpart WW]

f. Emission Limitation

1.89 lbs of NOx/hour; 8.28 tons of NOx/year

Applicable Compliance Method

The hourly and annual emission limitations represent the potential to emit for this emissions unit. The hourly emission limitation was determined by multiplying a cumulative maximum heat input of 19.30 mmBtu/hour by a conversion factor of



0.001 mmscf/mmBtu and an emission factor of 100 lbs of NO_x/MMcf (AP-42, Table 1.4-1 [7/98]).

The annual emission limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the pound per hour limitation, compliance with the annual emission limitation shall also be demonstrated. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

- g. Emission Limitation
1.59 lbs of CO/hour; 6.96 tons of CO/year

Applicable Compliance Method

The hourly and annual emission limitations represent the potential to emit for this emissions unit. The hourly emission limitation was determined by multiplying the a cumulative maximum heat input of 19.30 mmBtu/hour by a conversion factor of 0.001 mmscf/mmBtu and an emission factor of 84 lbs of CO/MMcf (AP-42, Table 1.4-1 [7/98]).

The annual emission limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the pound per hour limitation, compliance with the annual emission limitation shall also be demonstrated. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

- h. Emission Limitation
Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period

Applicable Compliance Method

Compliance shall be demonstrated in accordance with 40 CFR Part 63.3522(a) through 63.3522(d) for the compliant material option, or 40 CFR Part 63.3532(a) through 63.3532(d) for the emission rate without add-on controls option. [OAC rule 3745-77-07(C)(1), PTI #P0106443, and 40 CFR Part 63 Subpart KKKK]

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings. [OAC rule 3745-77-07(C)(1) and PTI #P0106443]

g) Miscellaneous Requirements

- (1) None



2. K002, Can Line 2

Operations, Property and/or Equipment Description:

Two-Piece Aluminum Beverage Container Manufacturing Line (Can Line #2)

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

(1) d)(5) through d)(7).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-10973 issued on 12/20/07)	<u>Coating Emissions</u> 40.72 lbs of volatile organic compounds (VOC)/hour, including cleanup materials; 145.96 tons of VOC/year, including cleanup materials (see b)(2)b.) 0.29 lb of particulate emissions (PE)/hour; 1.27 tons of PE/year Visible PE shall not exceed 0% opacity, as a six-minute average. <u>Natural Gas Combustion Emissions</u> 2.12 lbs of nitrogen oxides (NOx)/hour; 9.29 tons of NOx/year 0.128 lb of VOC (VOC)/hour; 0.56 ton of VOC/year The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart WW and OAC rule 3745-21-09(D).
b.	OAC rule 3745-21-09(D)	2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an overvarnish coating line 4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents,



Draft Title V Permit

Ball Metal Beverage Container Corporation

Permit Number: P0111246

Facility ID: 0332000023

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		from an interior body coating line
c.	OAC rule 3745-17-11(C)	See b)(2)a.
d.	40 CFR Part 60 Subpart WW	0.46 kilogram of VOC per liter of coating solids from each two-piece can over- varnish coating operation 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation
e.	40 CFR Part 63 Subpart KKKK	See 40 CFR Part 63.3490(b) Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period See b)(2)e.
f.	40 CFR 63.1-15 (40 CFR 63.3501)	Table 5 to Subpart KKKK of 40 CFR Part 63 – Applicability of General Provisions to Subpart KKKK shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-11(C)(3), any surface coating process with a Permit to Install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of this rule.
- b. The permittee shall employ (based upon the monthly VOC input rates) no more than 145.96 tons of VOC per rolling 12-month period (including cleanup materials).
- c. The 40.72 lbs of VOC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.
- d. The 2.12 lbs of NOx/hour and 0.128 lb of VOC/hour emission limitations were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.



- e. The permittee shall comply with the emission limitation for this emissions unit by using one of the following compliance options below:
 - 40 CFR Part 63.3491(a) – compliant material option
 - 40 CFR Part 63.3491(b) – emission rate without add-on controls option

- c) **Operational Restrictions**
 - (1) Each coating employed in this emissions unit shall comply with the VOC content restrictions specified in section b)(1) of the terms and conditions on an as applied basis. [OAC rule 3745-77-07(A)(1) and PTI #03-10973]
 - (2) The permittee shall operate the dry filtration system whenever this emissions unit is in operation [OAC rule 3745-77-07(A)(1) and PTI #03-10973]

- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping requirements contained in PTI #03-10973 issued on 12/20/07: paragraphs 2 & 3. The monitoring and recordkeeping requirements contained in the above-referenced PTI are subsumed into the monitoring and record keeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the PTI. [OAC rule 3745-77-07(C)(1)]
 - (2) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]
 - (3) The permittee shall maintain monthly records that list the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating, in lbs/gallon of coating and lbs/gallon of coating, excluding water and exempt solvents (Note: if the permittee mixes compliant coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.);
 - c. the type (i.e., interior body spray, exterior basecoat, overvarnish, exterior bottom end, etc.) and VOC content of each coating (in kg/liter of coating solids, as applied);
 - d. the number of gallons of each coating employed;
 - e. the VOC emission rate from each coating employed [d)(3)b. x d)(3)d.], in pounds;



- f. the VOC emission rate from all coatings employed (summation of d)(3)e. for all coatings), in tons;
 - g. the VOC content of each cleanup material employed, in lbs/gallon;
 - h. the number of gallons of each cleanup material employed;
 - i. the VOC emission rate from each cleanup material employed [d)(3)g. x d)(3)h.], in lbs;
 - j. the VOC emission rate from all cleanup materials employed (summation of d)(3)i. for all cleanup materials), in tons;
 - k. the total VOC emission rate from all coatings and cleanup materials employed (d)(3)f. + d)(3)j.), in tons; and
 - l. the rolling 12-month summation of the monthly VOC emission rates for all coatings and cleanup materials employed, in tons. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]
- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements as per 40 CFR Part 63, Subpart KKKK, including the following sections:
- a. A copy of each notification and report that you submitted to comply with this subpart and the documentation supporting each notification and report. [40 CFR 63.3512(a)]
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating and thinner and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.3512(b)]
 - c. A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option. [40 CFR 63.3512(c)(1)]
 - d. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of 63.3521. [40 CFR 63.3512(c)(2)]
 - e. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings and thinners used each month, using Equations 1, 1A, 1B, and 2 of 63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 63.3531(e)(3); the calculation of the total volume of coating solids used each



month, using Equation 2 of 63.3531; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 63.3531, or Equation 4 in 63.3531, if applicable. [40 CFR 63.3512(c)(3)]

- f. A record of the name and volume of each coating and thinner used during each compliance period. [40 CFR 63.3512(d)]
- g. A record of the mass fraction of organic HAP for each coating and thinner used during each compliance period. [40 CFR 63.3512(e)]
- h. A record of the volume fraction of coating solids for each coating used during each compliance period. [40 CFR 63.3512(f)]
- i. A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner used during each compliance period. [40 CFR 63.3512(g)]
- j. If you use an allowance in Equation 1 of 63.3531 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, or disposal facility (TSDF) according to 63.3531(e)(3) or otherwise managed in accordance with applicable Federal and State waste management regulations, you must keep the following records of the information specified in paragraphs (h)(1) through (3) of 40 CFR 63.3512:
 - i. The name and address of each TSDF or other applicable waste management location to which you sent waste materials for which you use an allowance in Equation 1 of 63.3531, a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility and the date of each shipment. [40 CFR 63.3512(h)(1)]
 - ii. Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of 63.3531. [40 CFR 63.3512(h)(2)]
 - iii. The methodology used in accordance with 63.3531(e)(3) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF or other applicable waste management location each month and the methodology to determine the mass of organic HAP contained in these waste materials. That must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [40 CFR 63.3512(h)(3)]
- k. You must keep records of the date, time, and duration of each deviation. [40 CFR 63.3512(i)]



- l. Your records must be kept in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR 63.3513(a)]
- m. As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.3513(b)]
- n. You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b). You may keep the records off site for the remaining 3 years. [40 CFR 63.3513(c)]

[OAC rule 3745-77-07(C)(1), PTI #03-10973, and 40 CFR Part 63 Subpart KKKK]

- (5) The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the PTI application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropyl alcohol
TLV (mg/m3): 983
Maximum Hourly Emission Rate (lb/hr): 0.53
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 190.30
MAGLC (ug/m3): 23,404.76

[PTI #03-10973]

- (6) Physical changes to or changes to the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the Air Toxic Policy will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the Air Toxic Policy include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;



- b. changes in the composition of the materials, of use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g. increased or decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(W)(1)(a)(ii), and a modification of the existing PTI will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (W)(1)(a)(ii)), then the permittee shall obtain a final PTI prior to the change. [PTI #03-10973]

- (7) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change. [PTI #03-10973]

e) Reporting Requirements

- (1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent or more stringent than the reporting requirements contained in PTI #03-10973 issued on 12/20/07: paragraphs 2-5. The reporting requirements contained in the PTI are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the PTI. [OAC rule 3745-77-07(C)(1)]
- (2) The permittee shall notify the Northwest District Office 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 Northwest District Office within 30 days after the event occurs. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]
- (3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]



- (4) The permittee shall submit quarterly deviation reports that identify all exceedances of the rolling 12-month VOC limitation of 145.96 tons. The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]
 - (5) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]
 - (6) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as required pursuant to 40 CFR Part 63 Subpart KKKK, per the following sections:
 - 40 CFR Part 63.3511(a) – semiannual compliance report
 - [OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KKKK]
 - (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]
- f) Testing Requirements
- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation
40.72 lbs of VOC/hour

Applicable Compliance Method
The permittee may demonstrate with this limitation as follows:
 - i. multiply the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all coatings employed (lbs/gallon);
 - ii. multiply the maximum hourly cleanup material usage rate (gallons/hr) by the maximum VOC content of all cleanup materials employed (lbs/gallon); and
 - iii. add f)(1)a.i. + f)(1)a.ii.If required, the permittee shall demonstrate compliance pursuant to Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60 Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-10973]
 - b. Emission Limitation
145.96 tons of VOC per rolling 12-month period



Applicable Compliance Method

Compliance with this limitation shall be based upon the recordkeeping requirements in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-10973]

c. Emission Limitation

0.29 lb of PE/hour; 1.27 tons of PE/year

Applicable Compliance Method

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

E = PE rate (lbs/hr)

E = maximum coating solids usage rate, in lbs/hour x (1 – TE) x (1 – CE)

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 (assumed to be 80%)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly emission limit in accordance with Methods 1-5 of 40 CFR Part 60 Appendix A.

The annual emission limitation was determined by multiplying the hourly emission limitation by 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-10973]

d. Emission Limitation

Visible PE shall not exceed 0% opacity, as six-minute average.

Applicable Compliance Method

The permittee shall demonstrate compliance with this VE limitation pursuant to 40 CFR Part 60 Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI #03-10973]

e. Emission Limitation

2.12 lbs of NOx/hour; 9.29 tons of NOx/year (from natural gas combustion)

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly limitation by multiplying the maximum hourly natural gas consumption rate (mmft³/hr) by the emission factor from AP-42, Table 1.4-1 (revised 07/98) of 100 lbs of NOx/mmft³.



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

The annual limitation was determined by multiplying the hourly emission limitation by 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-10973]

f. Emission Limitation

0.128 lb of VOC/hour; 0.56 ton of VOC/year (from natural gas combustion)

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly limitation by multiplying the maximum hourly natural gas consumption rate (mmft³/hr) by the emission factor from AP-42, Table 1.4-1 (revised 07/98) of 5.5 lbs of VOC/mmft³.

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation pursuant to Method 18, 25, or 25A of 40 CFR Part 60 Appendix A.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 hours per year and dividing by 2000 lbs).

[OAC rule 3745-77-07(C)(1) and PTI #03-10973]

g. Emission Limitation

0.89 kilogram of VOC per liter of coating solids, as applied (from each two-piece can interior body coating operation); 0.46 kilogram of VOC per liter of coating solids, as applied (from each two-piece can overvarnish coating operation); 4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents (from an interior body coating line); 2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents (from an overvarnish coating line)

Applicable Compliance Method

Compliance with these emission limitations shall be based upon the recordkeeping requirements in section d)(3) of this permit.

h. Emission Limitation

Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period

Applicable Compliance Method

Compliance shall be demonstrated in accordance with 40 CFR Part 63.3522(a) through 63.3522(d) for the compliant material option or 40 CFR Part 63.3532(a) through 63.3532(d) for the emission rate without add-on controls option.



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[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KKKK]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all coatings and cleanup materials. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]

g) Miscellaneous Requirements

(1) None



3. K003, Can Line 3

Operations, Property and/or Equipment Description:

Two-Piece Steel Food Can Manufacturing Line (Can Line #3)

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

(1) d)(5) through d)(7)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-10642 issued 12/23/97)	<u>Coating Emissions</u> 63.10 lbs of volatile organic compounds (VOC)/hour, including cleanup materials; 196.16 tons of VOC/year, including cleanup materials (see b)(2)b. and b)(2)c.) 1.06 lbs of particulate emissions (PE)/hour; 4.60 tons of PE/year <u>Natural Gas Combustion Emissions</u> 1.08 lbs of nitrogen oxides (NOx)/hour; 4.71 tons of NOx/year 0.06 lb of VOC (VOC)/hour; The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart WW and OAC rule 3745-21-09(D).
b.	OAC rule 3745-21-09(D)	4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents, from an interior body coating line
c.	OAC rule 3745-17-11(C)	See b)(2)a.
d.	40 CFR Part 60 Subpart WW	Exempt (see b)(2)d.)
e.	40 CFR Part 63 Subpart KKKK	See 40 CFR Part 63.3490(b) Organic hazardous air pollutants shall not exceed 0.06 kg/liter (0.51 lb/gal) of



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		coating solids during each compliance period See b)(2)g.
f.	40 CFR 63.1-15 (40 CFR 63.3501)	Table 5 to Subpart KKKK of 40 CFR Part 63 – Applicability of General Provisions to Subpart KKKK shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-11(C)(3), any surface coating process with a Permit to Install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of this rule.
- b. The VOC emissions (for all coatings and cleanup materials) shall not exceed 196.16 tons of VOC per rolling 12-month period.
- c. The permittee shall employ no more than 600 gallons of cleanup materials per rolling 12-month period.
- d. This emissions unit is not subject to the requirements of 40 CFR Part 60 Subpart WW because it is a steel food container manufacturing line.
- e. The 63.10 lbs of VOC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.
- f. The 1.08 lbs of NOx/hour and 0.06 lb of VOC/hour emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limitations.
- g. The permittee shall comply with the emission limitation for this emissions unit by using one of the following compliance options below:
 - 40 CFR Part 63.3491(a) – compliant material option
 - 40 CFR Part 63.3491(b) – emission rate without add-on controls option

c) Operational Restrictions



- (1) Each coating employed in this emissions unit shall comply with the VOC content restriction specified in section b)(1)b. on an “as applied” basis.

[OAC rule 3745-77-07(A)(1) and PTI #03-10642]

- (2) The permittee shall operate the dry filtration system whenever this emissions unit is in operation. [OAC rule 3745-77-07(A)(1) and PTI #03-10642]

d) Monitoring and/or Recordkeeping Requirements

- (1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirements are as stringent as or more stringent than the monitoring and recordkeeping requirements contained in PTI #03-10642 issued on 12/23/97: paragraphs 2 & 3. The monitoring and recordkeeping requirements contained in the above-referenced PTI are subsumed into the monitoring and recordkeeping requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the PTI. [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation. [OAC rule 3745-77-07(C)(1) and PTI #03-10973]

- (3) The permittee shall maintain monthly records that list the following information for this emissions unit:

- a. the name and identification number of each coating and cleanup material employed;
- b. the VOC content of each coating, in lbs/gallon of coating and lbs/gallon of coating, excluding water and exempt solvents (Note: if the permittee mixes compliant coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.);
- c. the number of gallons of each coating employed;
- d. the VOC emission rate from each coating employed [d)(3)b. x d)(3)c.], in pounds;
- e. the VOC emission rate from all coatings employed (summation of d)(3)d. for all coatings), in tons;
- f. the VOC content of each cleanup material employed, in lbs/gallon;
- g. the number of gallons of each cleanup material employed;
- h. the VOC emission rate from each cleanup material employed [d)(3)f. x d)(3)g.], in lbs;
- i. the VOC emission rate from all cleanup materials employed (summation of d)(3)h. for all cleanup materials), in tons;



- j. the total VOC emission rate from all coatings and cleanup materials employed [d)(3)e. + d)(3)i.], in tons;
 - k. the rolling 12-month summation of the monthly VOC emission rates for all coatings and cleanup materials employed, in tons. the total number of gallons of cleanup materials employed; and
 - l. the rolling 12-month summation of the number of gallons of cleanup materials employed. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]
- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements as per 40 CFR Part 63, Subpart KKKK, including the following sections:
- a. A copy of each notification and report that you submitted to comply with this subpart and the documentation supporting each notification and report. [40 CFR 63.3512(a)]
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating and thinner and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.3512(b)]
 - c. A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option. [40 CFR 63.3512(c)(1)]
 - d. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of 63.3521. [40 CFR 63.3512(c)(2)]
 - e. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings and thinners used each month, using Equations 1, 1A through 1C, and 2 of 63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 63.3531(e)(3); the calculation of the total volume of coating solids used each month, using Equation 2 of 63.3531; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 63.3531. [40 CFR 63.3512(c)(3)]
 - f. A record of the name and volume of each coating and thinner used during each compliance period. [40 CFR 63.3512(d)]
 - g. A record of the mass fraction of organic HAP for each coating and thinner used during each compliance period. [40 CFR 63.3512(e)]



- h. A record of the volume fraction of coating solids for each coating used during each compliance period. [40 CFR 63.3512(f)]
- i. A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner used during each compliance period. [40 CFR 63.3512(g)]
- j. If you use an allowance in Equation 1 of 63.3531 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, or disposal facility (TSDF) according to 63.3531(e)(3) or otherwise managed in accordance with applicable Federal and State waste management regulations, you must keep the following records of the information specified in paragraphs (h)(1) through (3) of 40 CFR 63.3512:
 - i. The name and address of each TSDF or other applicable waste management location to which you sent waste materials for which you use an allowance in Equation 1 of 63.3531, a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility and the date of each shipment. [40 CFR 63.3512(h)(1)]
 - ii. Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of 63.3531. [40 CFR 63.3512(h)(2)]
 - iii. The methodology used in accordance with 63.3531(e)(3) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF or other applicable waste management location each month and the methodology to determine the mass of organic HAP contained in these waste materials. That must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [40 CFR 63.3512(h)(3)]
- k. You must keep records of the date, time, and duration of each deviation. [40 CFR 63.3512(i)]
- l. Your records must be kept in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR 63.3513(a)]
- m. As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.3513(b)]
- n. You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record,



according to §63.10(b). You may keep the records off site for the remaining 3 years. [40 CFR 63.3513(c)]

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KKKK]

- (5) The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the PTI application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-butanol

TLV (mg/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 63.10

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 855.10

MAGLC (ug/m3): 2,667.24

[PTI #03-10642]

- (6) Physical changes to or changes to the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the Air Toxic Policy will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the Air Toxic Policy include the following:
- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, of use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g. increased or decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(W)(1)(a)(ii), and a modification of the existing PTI will not be required. If the change(s) is (are) defined as a modification under



other provisions of the modification definition (other than (W)(1)(a)(ii)), then the permittee shall obtain a final PTI prior to the change. [PTI #03-10973]

- (7) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change. [PTI #03-10973]

e) Reporting Requirements

- (1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent or more stringent than the reporting requirements contained in PTI #03-10642 issued 12/23/97: paragraphs 2-5. The reporting requirements contained in the PTI are subsumed into the reporting requirements of this operating permit so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the PTI. [OAC rule 3745-77-07(C)(1)]
- (2) The permittee shall notify the Northwest District Office 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 Northwest District Office within 30 days after the event occurs. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]
- (3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]
- (4) The permittee shall submit quarterly deviation reports that identify the following:
 - a. allexceedances of the rolling 12-month VOC limitation of 196.16 tons.
 - b. allexceedances of the rolling 12-month cleanup materials usage restriction of 600 gallons.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

- (5) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]



- (6) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as required pursuant to 40 CFR Part 63 Subpart KKKK, per the following sections:

40 CFR Part 63.3511(a) – semiannual compliance report

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KKKK]

- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation
63.10 lbs of VOC/hour

Applicable Compliance Method

The permittee may demonstrate with this limitation as follows:

- i. multiply the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all coatings employed (lbs/gallon);
- ii. multiply the maximum hourly cleanup material usage rate (gallons/hr) by the maximum VOC content of all cleanup materials employed (lbs/gallon); and
- iii. add f)(1)a.i. + f)(1)a.ii.

If required, the permittee shall demonstrate compliance pursuant to Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60 Appendix A. [OAC rule 3745-77-01(C)(1) and PTI #03-10642]

- b. Emission Limitation
196.16 tons of VOC per rolling 12-month period

Applicable Compliance Method

Compliance with this limitation shall be based upon the recordkeeping requirements in section d)(3) of this permit. [OAC rule 3745-77-01(C)(1) and PTI #03-10642]

- c. Emission Limitation
1.06 lbs of PE/hour; 4.60 tons of PE/year

Applicable Compliance Method

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



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

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

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 (assumed to be 80%)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly emission limit in accordance with Methods 1-5 of 40 CFR Part 60 Appendix A. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

The annual limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8760 hours/year and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

d. Emission Limitation

Visible PE shall not exceed 20% opacity as six-minute average, except as provided by rule

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1). [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

e. Emission Limitation

1.08 lbs of NO_x/hour; 4.71 tons of NO_x/year (from natural gas combustion)

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly limitation by multiplying the maximum hourly natural gas consumption rate (mmft³/hr) by the emission factor from AP-42, Table 1.4-1 (revised 07/98) of 100 lbs of NO_x/mmft³.

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation pursuant to Methods 1-5 and 7 of 40 CFR Part 60 Appendix A. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

The annual limitation was determined by multiplying the hourly emission limitation by a maximum operating rate of 8760 hours/year and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

f. Emission Limitation

0.06 lb of VOC/hour (from natural gas combustion)



Applicable Compliance Method

The permittee may demonstrate compliance with the hourly limitation by multiplying the maximum hourly natural gas consumption rate (mmft³/hr) by the emission factor from AP-42, Table 1.4-1 (revised 07/98) of 5.5 lbs of VOC/mmft³.

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation pursuant to Method 18, 25, or 25A of 40 CFR Part 60 Appendix A. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

g. Emission Limitation

4.2 lbs of VOC per gallon of coating, excluding water and exempt solvents (from an interior body coating line)

Applicable Compliance Method

The permittee shall demonstrate compliance with the VOC content limitation based on the monitoring and recordkeeping requirements specified in section d)(3). [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

h. Emission Limitation

The permittee shall employ no more than 600 gallons of cleanup materials per rolling 12-month period

Applicable Compliance Method

The permittee shall demonstrate compliance with the VOC content limitation based on the monitoring and recordkeeping requirements specified in section d)(3). [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

i. Emission Limitation

Organic hazardous air pollutants shall not exceed 0.07 kg/liter (0.59 lb/gal) of coating solids during each compliance period

Applicable Compliance Method

Compliance shall be demonstrated in accordance with 40 CFR Part 63.3522(a) through 63.3522(d) for the compliant material option or 40 CFR Part 63.3532(a) through 63.3532(d) for the emission rate without add-on controls option. [OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KKKK]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all coatings and cleanup materials. [OAC rule 3745-77-07(C)(1) and PTI #03-10642]

g) Miscellaneous Requirements

(1) None