



State of Ohio Environmental Protection Agency

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

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

RECEIVED

MAR 17 2008

CERTIFIED MAIL

CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

RE: FINAL PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01694
Fac ID: 1576051610

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 3/13/2008

Sonoco-Phoenix Inc. Warner Plant
Brent Bowers
PO Box 2290 3075 Brookline Rd
North Canton, OH 44720

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

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

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

Canton LAA



Permit To Install
Terms and Conditions

Issue Date: 3/13/2008
Effective Date: 3/13/2008

FINAL PERMIT TO INSTALL 15-01694

Application Number: 15-01694
Facility ID: 1576051610
Permit Fee: **\$1200**
Name of Facility: Sonoco-Phoenix Inc. Warner Plant
Person to Contact: Brent Bowers
Address: PO Box 2290 3075 Brookline Rd
North Canton, OH 44720

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2121 Warner Road SE
Canton, Ohio**

Description of proposed emissions unit(s):
Synthetic minor PTI for the installation of new coating and repair lines being transferred from the company Brazilian operation.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. 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.

5. 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).

6. 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.

7. 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.

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	16.77

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K047) - Line 200 Blanked End Liner

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary BAT Restriction	Permit to Install 15-01694 for this air contaminant source takes into account the voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction proposed by the permittee consists of a synthetic minor restriction on the facility's PTE in order to keep the facility from exceeding the Title V VOC threshold.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT requirements.	Volatile organic compound emissions from this emissions unit shall not exceed 1.64 ton per year based upon a rolling, 12-month summation of the monthly emissions. See section A.2.a.
OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
OAC rule 3745-114-01(A)	See section A.2.d.

2. Additional Terms and Conditions

- 2.a The combined annual HAP emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed the following as a rolling, 12-month summation:
 - i. 24.0 tons of all hazardous air pollutants (HAP); and
 - ii. 9.0 tons of any individual HAP.
- 2.b The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations

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

Month(s)	Maximum Allowable Commutative Emissions of Each Individual HAP (tons)	Maximum Allowable Commutative Emissions Total Combined HAPs (tons)
1	1.0	2.0
1-2	2.0	4.0
1-3	3.0	6.0
1-4	4.0	8.0
1-5	5.0	10.0
1-6	6.0	12.0
1-7	6.5	14.0
1-8	7.0	16.0
1-9	7.5	18.0
1-10	8.0	20.0
1-11	8.5	22.0
1-12	9.0	24.0

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

- 2.d** The permit to install for emissions units (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046 thru K052) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install 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 permit to install 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: MIBK

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 13.93

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 1,327

MAGLC (ug/m³): 4,880

Physical changes to or changes in 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:

- i. changes in the composition of the materials used (typically for 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 previously modeled;
- ii. changes in the composition of the materials, or 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
- iv. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- iii. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

B. Operational Restrictions

1. The limitation for volatile organic compound emissions from this emissions unit of 1.64 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:
 - a. the maximum annual amount of cleanup material used shall not exceed 498 gallons, based upon a rolling 12-month summation of the amount of cleanup material used each month; and
 - b. the VOC content of the cleanup material used shall not exceed 6.6 lbs/gal. Other materials may be used if approved by the Canton local air agency prior to initial use.
 - c. To ensure enforce ability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	42
1-2	84
1-3	126
1-4	168
1-5	210
1-6	252
1-7	294
1-8	336
1-9	420
1-10	462
1-11	480
1-12	498

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for each coating, cleanup material, rust inhibitor, or tab lubricant employed:
 - a. the name and identification number of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;

- e. the number of gallons of each cleanup material employed
 - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (c) for all of the coatings plus the sum of (b) times (e) for all cleanup materials); and
 - g. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months).
4. The permittee shall collect and record the following information each day for the emissions unit:
- a. the name and identification number of each coating and cleanup material employed; and
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs
- 2. The permittee shall submit annual reports which specify the VOC material usage (includes each coating, cleanup material, tab lubricant or rust inhibitors), the VOC, total HAP, and individual HAP emissions, in tons, for the entire facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 3. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.
- 4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month usage limitation of 498 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and
 - b. the rolling, 12-month emission limitations for total VOC.

E. Testing and Compliance

1. Compliance with emission limitations described below shall be determined in accordance with the following methods:

a. Emission Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046 and K047 thru K052) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.g.

b. Emission Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046 and K047 thru K052) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.h.

c. Emission Limitation

3.7 lb VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.4.

d. Emission Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 1.64 ton/yr based upon a rolling, 12-month summation..

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.3g.

2. Compliance with the operational limitations of this permit shall be determined in accordance with the following methods:

a. Operational Limitation

The maximum annual amount of cleanup material used shall not exceed 498 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and record keeping as specified in sections C.3.e.

VI. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K048) - Line 200 conversion Press

<p>OAC rule 3745-31-05(C) Voluntary Limit to avoid BAT</p>	<p>Permit to Install 15-01694 for this air contaminant source takes into account the voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction proposed by the permittee consists of a synthetic minor restriction on the facility's PTE in order to keep the facility from exceeding Title V thresholds.</p>
<p>OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V</p>	<p>Volatile organic compound emissions from this emissions unit shall not exceed 3.34 tons per year based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See section A.2.a.</p>
<p>OAC rule 3745-21-09(U)(2)(e)</p>	<p>See section A.2.e below.</p>
<p>OAC rule 3745-114-01(A)</p>	<p>See section A.2.d.</p>

2. Additional Terms and Conditions

- 2.a The combined annual HAP emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed the following as a rolling, 12-month summation:
 - i. 24.0 tons of all hazardous air pollutants (HAP); and
 - ii. 9.0 tons of any individual HAP.
- 2.b The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations

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

Month(s)	Maximum Allowable Commutative Emissions of Each Individual HAP (tons)	Maximum Allowable Commutative Emissions Total Combined HAPs (tons)
1	1.0	2.0
1-2	2.0	4.0
1-3	3.0	6.0
1-4	4.0	8.0
1-5	5.0	10.0
1-6	6.0	12.0
1-7	6.5	14.0
1-8	7.0	16.0
1-9	7.5	18.0
1-10	8.0	20.0
1-11	8.5	22.0
1-12	9.0	24.0

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

- 2.d** The permit to install for emissions units (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046 thru K052) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install 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 permit to install 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: MIBK

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 13.93

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 1,327

MAGLC (ug/m³): 4,880

Physical changes to or changes in 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:

- i. changes in the composition of the materials used (typically for 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 previously modeled;
- ii. changes in the composition of the materials, or 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
- iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- iii. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

- 2.e** The maximum daily tab lubricant usage for this emissions unit shall not exceed 10 gallons.

- 2.f** The limitation for VOC from this emissions units of 3.34 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:
- i. the maximum amount of tab lubricant used shall not exceed 1,162 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;
 - ii. the VOC content of the tab lubricant used shall not exceed 5.75 lbs/gallon (minus water and exempt solvents); and
- 2.g** To ensure enforce ability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	97
1-2	194
1-3	291
1-4	388
1-5	485
1-6	582
1-7	679
1-8	776
1-9	873
1-10	970
1-11	1067
1-12	1162

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual tab lubricant usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

- 1. The permittee shall collect and record the following information for each month for each coating, cleanup material, rust inhibitor, or tab lubricant employed:
 - a. the name and identification number of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;

- b. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of individual HAP per gallon of each coating, cleanup material, tab lubricant or rust inhibitor, as applied;
- c. the total combined HAP content of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of combined HAPs per gallon of each coating, cleanup material, tab lubricant and rust inhibitor, as applied (sum all the individual HAP contents from (b));
- d. the number of gallons of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;
- e. the total individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- f. the total combined HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- g. the rolling, 12-month summation of individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per year (the sum of (e) for the previous 12 calendar months); and
- h. the rolling, 12-month summation of the total combined HAP usage from all each coating, cleanup material, tab lubricant or rust inhibitors employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Canton local air agency. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect and record the following information each day for the emissions unit:
 - a. the name and identification number of each tab lubricant employed; and
 - b. the total gallons of each tab lubricant employed, as applied.
3. The permittee shall collect and record the following information for each month for each tab lubricant employed:
 - a. the name and identification number of each tab lubricant employed, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant employed, as applied;

- c. the number of gallons of each tab lubricant employed, as applied;
 - d. the total VOC emissions from all tab lubricants employed, in pounds or tons per month (the sum of (b) times (c) for all of the tab lubricants);
 - e. the rolling, 12-month summation of the total VOC emissions from all tab lubricants employed, in pounds or tons per year (the sum of (d) for the previous 12 calendar months); and
 - f. the rolling, 12-month summation of the total gallons of the tab lubricant employed (the sum of (c) for the previous 12 calendar months).
4. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the tab lubricant usage for each calendar month.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs
2. The permittee shall submit annual reports which specify the VOC material usage (includes each coating, cleanup material, tab lubricant or rust inhibitors), the VOC, total HAP, and individual HAP emissions, in tons, for the entire facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Canton local air agency in writing of any daily record showing that the coating line employs more than the applicable maximum daily tab lubricant usage limit. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month usage limitation of 1162 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant levels;
 - b. the rolling, 12-month emission limitations for VOCs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for VOCs; and

E. Testing and Compliance

1. Compliance with the emission limitations described below shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.g.
 - b. **Emission Limitation**
The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.h
 - c. **Emission Limitation**
Volatile organic compound emissions from this emissions unit shall not exceed 3.34 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and record keeping as specified in section C.3.e.
2. Compliance with the operational limitations of this permit shall be determined in accordance with the following methods:
 - a. **Operational Limitation**
The maximum daily combined tab lubricant usage for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and record keeping as specified in section C.2.b.

b. Operational Limitation

The maximum annual amount of tab lubricant used shall not exceed 1162 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.3.f.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K049) - Line 200 Post Repair Spray

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary restrictions to avoid BAT	Permit to Install 15-01694 for this air contaminant source takes into account voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction proposed by the permittee consists of the use a Regenerative Thermal Oxidizer(RTO) to limit VOC emissions. These restrictions limit VOC emissions for this emissions unit to below 10 tons VOC/year.
ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO,NOx,SO2, or PE from this air contaminant source since the uncontrolled potential to emit for these pollutants are less than ten tons per year.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	7.8 tons VOC/year from all coating and cleanup material as a rolling, 12 month summation. See section A.2.a
OAC rule 3745-21-09(B)(6)	See section A.2.e.

2. Additional Terms and Conditions

- 2.a The combined annual HAP emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed the following as a rolling, 12-month summation:
 - i. 24.0 tons of all hazardous air pollutants (HAP); and
 - ii. 9.0 tons of any individual HAP.
- 2.b The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air

Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations

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

Month(s)	Maximum Allowable Cumulative Emissions of Each Individual HAP (tons)	Maximum Allowable Cumulative Emissions Total Combined HAPs (tons)
1	1.0	2.0
1-2	2.0	4.0
1-3	3.0	6.0
1-4	4.0	8.0
1-5	5.0	10.0
1-6	6.0	12.0
1-7	6.5	14.0
1-8	7.0	16.0
1-9	7.5	18.0
1-10	8.0	20.0
1-11	8.5	22.0
1-12	9.0	24.0

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

- 2.d** The permit to install for emissions units (K015, K016, K020, K021, K022, K024 thru K030, K040, K041, K043, K045, K046, and K047 thru K052) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install 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 permit to install 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: MIBK

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 13.93

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 1,327

MAGLC (ug/m³): 4,880

Physical changes to or changes in 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:

- i. changes in the composition of the materials used (typically for 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 previously modeled;
- ii. changes in the composition of the materials, or 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
- iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- iii. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

- 2.e** The permittee shall demonstrate that the capture and control equipment provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.
- 2.f** The permittee shall not utilize more than 200 gallons of cleanup material per year.
- 2.g** To ensure enforce ability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative gallons of cleanup material (tons)</u>
1	17
1-2	34
1-3	51
1-4	68
1-5	85
1-6	102
1-7	122
1-8	139
1-9	153
1-10	170
1-11	187
1-12	200

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

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (tons)</u>
1	0.65
1 - 2	1.30
1 - 3	1.95
1 - 4	2.60
1 - 5	3.25
1 - 6	3.90
1 - 7	4.55
1 - 8	5.20
1 - 9	5.85

1 - 10	6.50
1 - 11	7.15
1 - 12	7.80

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

B. Operational Restrictions

1. The permittee shall fire only natural gas as fuel in the RTO servicing this emissions unit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for each coating, cleanup material, rust inhibitor, or tab lubricant employed:
 - a. the name and identification number of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of individual HAP per gallon of each coating, cleanup material, tab lubricant or rust inhibitor, as applied;
 - c. the total combined HAP content of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of combined HAPs per gallon of each coating, cleanup material, tab lubricant and rust inhibitor, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;
 - e. the total individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
 - f. the total combined HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
 - g. the rolling, 12-month summation of individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per year (the sum of (e) for the previous 12 calendar months); and
 - h. the rolling, 12-month summation of the total combined HAP usage from all each coating, cleanup material, tab lubricant or rust inhibitors employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Canton local air agency. This information does not have to be kept on a line-by-line basis.

2. The permittee shall operate and maintain the continuous temperature monitor and recorder to measure and record the combustion temperature within the RTO at all times when the emissions unit is in operation.
3. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. The permittee shall collect and record the following information each day for the coating line and control equipment:
 - a. the name and identification number of each coating and cleanup material employed, as applied;
 - b. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied;
 - c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - d. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was less than 1500 degree F until such time as a new operating temperature is established through emission testing ; and
 - e. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
5. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the name and identification number of each coating employed, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;
 - c. the number of gallons of each coating, as applied;

- d. the name and identification number of each cleanup material employed;
 - e. the number of gallons of each cleanup material employed;
 - f. the total controlled VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month ((the sum of (b) times (c) for all of the coatings plus the sum of (b) times (e) for all cleanup materials) times (1-overall control efficiency of the RTO));
 - g. the rolling annual, 12 month summation of the total gallons of cleanup material employed, in gallons/year; and
 - h. the number of hours of operation of the emissions unit and the RTO.
6. The permittee shall maintain records of any time when a fuel other than natural gas is burned in the RTO as fuel.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs
2. The permittee shall submit annual reports which specify the VOC material usage (includes each coating, cleanup material, tab lubricant or rust inhibitors), the VOC, total HAP, and individual HAP emissions, in tons, for the entire facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coating materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.
4. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1500 degree F until such time as a new operating temperature is established through emission testing and, after the initial emission testing is complete, more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for VOC, in tons VOC/year or the rolling, 12-month cleanup material usage summation restriction of 200 gallons.

6. The permittee shall submit quarterly deviation (excursion) reports which identify any times when a fuel other than natural gas was burned as fuel in the RTO servicing this emissions unit.

E. Testing and Compliance

1. Compliance with the emissions limitations described below shall be determined in accordance with the following methods:

- a. Emission Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.h.

- b. Emission Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.g.

- c. Emission Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 7.8 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be based on the monitoring and record keeping as specified in section C.5.f.

- d. Operational Limitation:

The maximum annual amount of cleanup material used shall not exceed 200 gallons

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.5.g.

e. Operational Limitation:

The RTO shall operate at an overall control efficiency of no less than 81% and a control efficiency of no less than 90% efficiency.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emissions testing using US EPA Methods 18, 25 or 25A (40 CFR Part 60) or an approved alternative test procedure and mass balance for VOC as specified in section A.V.2.

2. The permittee shall conduct emissions testing for this emissions unit in accordance with the following requirements:
- a. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup of such facility, and at such other times as may be required by the Administrator under section 114 of the Act, Ohio EPA, or the Canton local air agency, the permittee shall conduct performance test(s).
 - b. Emissions testing shall be conducted at or near maximum capacity.
 - c. The permittee shall conduct emissions testing for VOC, in lbs VOC/hr., at the inlet and outlet to the RTO for the purpose of determining the overall control efficiency of the RTO. The permittee shall also collect production data sufficient to calculate the lbs VOC/hr. being generated by the process. Capture and control efficiencies shall be calculated using a mass balance approach based on the quantities of VOC generated, VOC inlet to the RTO, and VOC outlet to the RTO.
 - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test(ITT)" notification to the Canton Local Air Agency. The ITT shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person conducting the tests. Failure to submit such a notification for review and approval at least 30 days prior to the test may result in the Canton Local Air Agency's refusal to accept the results of the emission test(s).
 - e. Personnel from the Canton LAA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the Canton LAA within 30 days following completion of the test(s).

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K050) - Line 202 Blanked End Liner

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary BAT Restriction	Permit to Install 15-01694 for this air contaminant source takes into account the voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction proposed by the permittee consists of a synthetic minor restriction on the facility's PTE in order to keep the facility from exceeding the Title V VOC threshold.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT requirements.	Volatile organic compound emissions from this emissions unit shall not exceed 0.87 ton per year based upon a rolling, 12-month summation of the monthly emissions. See section A.2.a.
OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
OAC rule 3745-114-01(A)	See section A.2.d.

2. Additional Terms and Conditions

- 2.a The combined annual HAP emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed the following as a rolling, 12-month summation:
 - i. 24.0 tons of all hazardous air pollutants (HAP); and
 - ii. 9.0 tons of any individual HAP.
- 2.b The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations

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

Month(s)	Maximum Allowable Commutative Emissions of Each Individual HAP (tons)	Maximum Allowable Commutative Emissions Total Combined HAPs (tons)
1	1.0	2.0
1-2	2.0	4.0
1-3	3.0	6.0
1-4	4.0	8.0
1-5	5.0	10.0
1-6	6.0	12.0
1-7	6.5	14.0
1-8	7.0	16.0
1-9	7.5	18.0
1-10	8.0	20.0
1-11	8.5	22.0
1-12	9.0	24.0

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

- 2.d** The permit to install for emissions units (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046 thru K052) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install 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 permit to install 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: MIBK

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 13.93

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 1,327

MAGLC (ug/m³): 4,880

Physical changes to or changes in 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:

- i. changes in the composition of the materials used (typically for 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 previously modeled;
- ii. changes in the composition of the materials, or 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
- iv. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- iii. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

- b. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of individual HAP per gallon of each coating, cleanup material, tab lubricant or rust inhibitor, as applied;
- c. the total combined HAP content of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of combined HAPs per gallon of each coating, cleanup material, tab lubricant and rust inhibitor, as applied (sum all the individual HAP contents from (b));
- d. the number of gallons of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;
- e. the total individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- f. the total combined HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- g. the rolling, 12-month summation of individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per year (the sum of (e) for the previous 12 calendar months); and
- h. the rolling, 12-month summation of the total combined HAP usage from all each coating, cleanup material, tab lubricant or rust inhibitors employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Canton local air agency. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect and record for each cleanup material the rolling, 12-month summation of the total gallons of cleanup material employed. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage for each calendar month.
3. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:
 - a. the name and identification number of each coating employed, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;
 - c. the number of gallons of each coating employed, as applied;
 - d. the name and identification number of each cleanup material employed;

- e. the number of gallons of each cleanup material employed;
 - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (c) for all of the coatings plus the sum of (b) times (e) for all cleanup materials); and
 - g. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months).
4. The permittee shall collect and record the following information each day for the emissions unit:
- a. the name and identification number of each coating and cleanup material employed; and
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs
- 2. The permittee shall submit annual reports which specify the VOC material usage (includes each coating, cleanup material, tab lubricant or rust inhibitors), the VOC, total HAP, and individual HAP emissions, in tons, for the entire facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 3. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.
- 4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month usage limitation of 264 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and
 - b. the rolling, 12-month emission limitations for total VOC.

E. Testing and Compliance

1. Compliance with the emission limitations described below shall be determined in accordance with the following methods:

- a. Emission Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.g.

- b. Emission Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.h.

- c. Emission Limitation

3.7 lb VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.4.

- d. Emission Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.87 ton/yr based upon a rolling, 12-month summation..

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.3g.

2. Compliance with the operational limitations of this permit shall be determined in accordance with the following methods:

- a. Operational Limitation

The maximum annual amount of cleanup material used shall not exceed 264 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in sections C.3.e.

VI. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K051) - Line 202 Conversion Press

OAC rule 3745-31-05(C) Voluntary Limit to avoid BAT	Permit to Install 15-01694 for this air contaminant source takes into account the voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction proposed by the permittee consists of a synthetic minor restriction on the facility's PTE in order to keep the facility from exceeding Title V thresholds.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>Volatile organic compound emissions from this emissions unit shall not exceed 1.71 tons per year based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See section A.2.a.</p>
OAC rule 3745-21-09(U)(2)(e)	See section A.2.e.
OAC rule 3745-114-01(A)	See section A.2.d.

2. Additional Terms and Conditions

- 2.a The combined annual HAP emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed the following as a rolling, 12-month summation:
 - i. 24.0 tons of all hazardous air pollutants (HAP); and
 - ii. 9.0 tons of any individual HAP.
- 2.b The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

- 2.c** To ensure enforce ability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Commutative Emissions of Each Individual HAP (tons)	Maximum Allowable Commutative Emissions Total Combined HAPs (tons)
1	1.0	2.0
1-2	2.0	4.0
1-3	3.0	6.0
1-4	4.0	8.0
1-5	5.0	10.0
1-6	6.0	12.0
1-7	6.5	14.0
1-8	7.0	16.0
1-9	7.5	18.0
1-10	8.0	20.0
1-11	8.5	22.0
1-12	9.0	24.0

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

- 2.d** The permit to install for emissions units (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046 thru K052) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install 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 permit to install 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: MIBK

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 13.93

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 1,327

MAGLC (ug/m³): 4,880

Physical changes to or changes in 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:

- i. changes in the composition of the materials used (typically for 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 previously modeled;
- ii. changes in the composition of the materials, or 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
- iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
 - iii. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.
- 2.e** The maximum daily tab lubricant usage for this emissions unit shall not exceed 10 gallons.

- 2.f** The limitation for VOC from this emissions units of 1.71 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:
- i. the maximum amount of tab lubricant used shall not exceed 616 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month; and
 - ii. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gallon (minus water and exempt solvents).
- 2.g** To ensure enforce ability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	51
1-2	103
1-3	154
1-4	205
1-5	257
1-6	308
1-7	359
1-8	410
1-9	461
1-10	513
1-11	564
1-12	616

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual tab lubricant usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for each coating, cleanup material, rust inhibitor, or tab lubricant employed:
 - a. the name and identification number of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;

- b. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of individual HAP per gallon of each coating, cleanup material, tab lubricant or rust inhibitor, as applied;
- c. the total combined HAP content of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of combined HAPs per gallon of each coating, cleanup material, tab lubricant and rust inhibitor, as applied (sum all the individual HAP contents from (b));
- d. the number of gallons of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;
- e. the total individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- f. the total combined HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- g. the rolling, 12-month summation of individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per year (the sum of (e) for the previous 12 calendar months); and
- h. the rolling, 12-month summation of the total combined HAP usage from all each coating, cleanup material, tab lubricant or rust inhibitors employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Canton local air agency. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect and record the following information for each month for each tab lubricant employed:
 - a. the name and identification number of each tab lubricant employed, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant employed, as applied;
 - c. the number of gallons of each tab lubricant employed, as applied;
 - d. the total VOC emissions from all tab lubricants employed, in pounds or tons per month (the sum of (b) times (c) for all of the tab lubricants);
 - e. the rolling, 12-month summation of the total VOC emissions from all tab lubricants employed, in pounds or tons per year (the sum of (d) for the previous 12 calendar months); and

- f. the rolling, 12-month summation of the total gallons of the tab lubricant employed (the sum of (c) for the previous 12 calendar months).
3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the tab lubricant usage for each calendar month.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs
2. The permittee shall submit annual reports which specify the VOC material usage (includes each coating, cleanup material, tab lubricant or rust inhibitors), the VOC, total HAP, and individual HAP emissions, in tons, for the entire facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Canton local air agency in writing of any daily record showing that the coating line employs more than the applicable maximum daily tab lubricant usage limit. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month usage limitation of 616 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant levels; and
 - b. the rolling, 12-month emission limitations for VOCs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for VOCs.

E. Testing and Compliance

1. Compliance with the emission limitations described below shall be determined in accordance with the following methods:
 - a. Emission Limitation
The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.g.

b. Emission Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046 and K047 thru K052) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.h.

c. Emission Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 1.71 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.2.e.

2. Compliance with the operational limitations of this permit shall be determined in accordance with the following methods:

a. Operational Limitation

The maximum daily combined tab lubricant usage for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.2.b.

b. Operational Limitation

The maximum annual amount of tab lubricant used shall not exceed 616 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.2.f.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K052) - Line 202 Ecoater

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary Restriction to avoid BAT.	Permit to Install 15-01694 for this air contaminant source takes into account the voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction proposed by the permittee consists of a synthetic minor restriction on the facility's PTE in order to keep the facility from exceeding Title V thresholds.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	Volatile organic compound emissions from this emissions unit shall not exceed 1.40 tons per year based upon a rolling, 12-month summation of the monthly emissions. See section A.2.a.
OAC rule 3745-21-09(U)(1)(a)	4.3 lbs VOC/gallon of coating
OAC rule 3745-114-01(A)	See section A.2.d.

2. Additional Terms and Conditions

- 2.a** The combined annual HAP emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed the following as a rolling, 12-month summation:
- i. 24.0 tons of all hazardous air pollutants (HAP); and
 - ii. 9.0 tons of any individual HAP.
- 2.b** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air

Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations

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

Month(s)	Maximum Allowable Commutative Emissions of Each Individual HAP (tons)	Maximum Allowable Commutative Emissions Total Combined HAPs (tons)
1	1.0	2.0
1-2	2.0	4.0
1-3	3.0	6.0
1-4	4.0	8.0
1-5	5.0	10.0
1-6	6.0	12.0
1-7	6.5	14.0
1-8	7.0	16.0
1-9	7.5	18.0
1-10	8.0	20.0
1-11	8.5	22.0
1-12	9.0	24.0

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

- 2.d** The permit to install for emissions units (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install 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 permit to install 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: MIBK
TLV (mg/m³): 205
Maximum Hourly Emission Rate (lbs/hr): 13.93
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 1,327
MAGLC (ug/m³): 4,880

Physical changes to or changes in 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:

- i. changes in the composition of the materials used (typically for 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 previously modeled;
- ii. changes in the composition of the materials, or 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
- iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- iii. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

B. Operational Restrictions

1. The limitation for volatile organic compound emissions from this emissions unit of 1.40 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved limiting the maximum annual amount of coating used to 16,500 gallons, based upon a rolling, 12-month summation of the amount of coating used each month.
2. To ensure enforce ability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	1375
1-2	2750
1-3	4125
1-4	5500
1-5	6875
1-6	8250
1-7	9625
1-8	11,000
1-9	12,375
1-10	13,750
1-11	15,125
1-12	16,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for each coating, cleanup material, rust inhibitor, or tab lubricant employed:
 - a. the name and identification number of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of individual HAP per gallon of each coating, cleanup material, tab lubricant or rust inhibitor, as applied;
 - c. the total combined HAP content of each coating, cleanup material, tab lubricant or rust inhibitor, in pounds of combined HAPs per gallon of each coating,

cleanup material, tab lubricant and rust inhibitor, as applied (sum all the individual HAP contents from (b));

- d. the number of gallons of each coating, cleanup material, tab lubricant or rust inhibitor employed, as applied;
- e. the total individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- f. the total combined HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per month;
- g. the rolling, 12-month summation of individual HAP usage from all coatings, cleanup materials, tab lubricants and rust inhibitors employed, in pounds or tons per year (the sum of (e) for the previous 12 calendar months); and
- h. the rolling, 12-month summation of the total combined HAP usage from all each coating, cleanup material, tab lubricant or rust inhibitors employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Canton local air agency. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect and record the following information each day for the emissions unit:
 - a. the name and identification number of each coating and cleanup material employed; and
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied.
3. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:
 - a. the name and identification number of each, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each, as applied;
 - c. the number of gallons of each, as applied;
 - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (c) for all of the coatings);

- e. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (d) for the previous 12 calendar months); and
- f. the rolling, 12-month summation of the total gallons of coatings and cleanup materials employed (the sum of (e) for the previous 12 calendar months).

This information does not have to be kept on a line-by-line basis.

4. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the coating usage for each calendar month.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.
2. The permittee shall submit annual reports which specify the VOC material usage (includes each coating, cleanup material, tab lubricant or rust inhibitors), the VOC, total HAP, and individual HAP emissions, in tons, for the entire facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitation of 16,500 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.
5. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup) and the VOC emissions, in tons, for all operating emissions units at the facility during the past year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing and Compliance

1. Compliance with the emission limitations described below shall be determined in accordance with the following methods:
 - a. Emission Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.h

b. **Emission Limitation**

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015, K016, K020, K021, K022, K024 thru K028, K030, K040, K041, K043, K045, K046, and K047 thru K052) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.1.g.

c. **Emission Limitation**

4.3 lb VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.2.b.

d. **Emission Limitation**

Volatile organic compound emissions from this emissions unit shall not exceed 1.40 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.3.f.

2. Compliance with the operational limitations of this permit shall be determined in accordance with the following methods:

a. **Operational Limitation**

The maximum annual amount of coating used shall not exceed 16,500 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and record keeping as specified in section C.4.

F. Miscellaneous Requirements

None

