

Facility ID: 0332000023 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 (2 propane-fired boilers); B002 (3 propane-fired boilers); B003 (2 propane-fired boilers); L001 (cold cleaner 1); L002 (cold cleaner 2); L003 (cold cleaner 3); L004 (cold cleaner 4); L005 (cold cleaner 5); L006 (cold cleaner 6); L007 (cold cleaner 7); P001 (can washer ovens); P006 (solvent recovery system); P016 (end compound liner/conversion press AA); P017 (end compound liner/conversion press TT); P018 (end compound liner/conversion press UU); P019 - end compound liner/conversion press VV); P020 (end compound liner/conversion press WW); P023 (end compound liner/conversion press NN); P024 (end compound liner/conversion press OO); P025 (end compound liner/conversion press PP); Z001 (end compound liner/conversion press NN); Z002 (end compound liner/conversion press OO); Z003 (end compound liner/conversion press PP); Z004 (cold cleaner 8); Z005 (cold cleaner 9); and Z006 [end compound liner/conversion press module 2 (21, 22, 23)].

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install (PTI) for the emissions unit.

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- [Go to Part III for Emissions Unit K002](#)
- [Go to Part III for Emissions Unit K003](#)
- [Go to Part III for Emissions Unit K004](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0332000023 Emissions Unit ID: K001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage can line (can line #1)	OAC rule 3745-17-07	None (see A.I.2.a)
	OAC rule 3745-17-11 40 CFR Part 60, Subpart WW	None (see A.I.2.b) for the interior body coating operation: 0.89 kilogram volatile organic compounds (VOC) per liter of coating solids for the exterior bottom end coating operation: 0.29 kilogram of VOC per liter of coating solids
	OAC rule 3745-21-09(D)	For the overvarnish coating operation, the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). for the interior body coating operation: 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents
		For the exterior bottom end coating operation, the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). for the overvarnish coating operation: 2.8 pounds of VOC per gallon coating, excluding water and exempt solvents
	OAC rule 3745-31-05 (PTI #03-5778)	for the overvarnish coating operation: 0.34 kilogram of VOC per liter of coating solids
		for the exterior bottom end coating operation: 2.1 pounds of VOC per gallon coating, excluding water and exempt solvents
		for inks: 15% (by weight) VOC, based on on a monthly weighted-average
		for cleanup materials: 6.81 lbs VOC per gallon
		16.4 tons of VOC per month (including cleanup materials and inks)
		196.88 tons VOC per rolling, 12-month period

(including cleanup materials and inks)

2. Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Hancock County.

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1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content restrictions specified in A.I of the terms and conditions, on an "as applied" basis.

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1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-5778, issued on October 17, 1991: paragraphs 2 & 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall calculate and record each month the following information for this emissions unit:
 - a. the company and manufacturer's identification for each coating, ink and cleanup material employed;
 - b. the type (i.e., interior body spray, exterior basecoat, overvarnish, and exterior bottom end) and VOC content of each coating (i.e., in lbs/gallon of coating, in lbs/gallon of coating excluding water and exempt solvents, and in kg/liter of coating solids) and the VOC content of each cleanup material employed, in pounds per gallon;
 - c. the VOC content of each ink employed, in percent by weight;
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the number of pounds of each ink employed;
 - f. the total number of pounds of all the inks employed (summation of e for all inks);
 - g. the total number of pounds of VOCs for the all the inks employed [summation of (c x e/100) for all inks];
 - h. the VOC content of all the inks employed, in percent by weight, based on a mass-weighted average [(g/f) x 100];
 - i. the total VOC emissions for all the coatings, inks and cleanup materials employed [summation of (b x d) for all coatings and cleanup materials + g], in tons; and
 - j. the total VOC emissions for all the coatings, inks and cleanup materials, based upon a rolling, 12-month summation, in tons.

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1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-5778, issued on October 17, 1991: paragraphs 2 - 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly VOC limitation of 16.4 tons and the rolling, 12-month VOC limitation of 196.88 tons.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing

of any monthly record showing the use of noncomplying coatings, inks and cleanup materials (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

5. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
 - 0.89 kilogram of VOC per liter of coating solids, as applied (for interior body spray coating)
 - 0.29 kilogram of VOC per liter of coating solids, as applied (for exterior bottom end coating)
 - 0.34 kilogram of VOC per liter of coating solids, as applied (for overvarnish spray coating)
 - 2.1 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied (for exterior bottom end coating)
 - 4.2 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied (for interior body spray coating)
 - 2.8 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied (for overvarnish spray coating)
 - 15% by weight, based on a monthly weighted average (for inks)
 - 6.81 pounds of VOC per gallon (for cleanup materials)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitations above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.
 - b. Emission Limitation:
 - 16.4 tons of VOC per month

The permittee shall demonstrate compliance with the VOC limitation above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.
 - c. Emission Limitation:
 - 196.88 tons of VOC per year

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC limitation based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings, inks and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 033200023 Emissions Unit ID: K001 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0332000023 Emissions Unit ID: K002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage container manufacturing line (can line #2)	OAC rule 3745-17-07	None (see A.I.2.a)
	OAC rule 3745-17-11	None (see A.I.2.b)
	40 CFR Part 60, Subpart WW	for the interior body coating operation: 0.89 kilogram volatile organic compounds (VOC) per liter of coating solids

OAC rule 3745-21-09(D)

for the exterior bottom end coating operation: 0.29 kilogram of VOC per liter of coating solids
 for the overvarnish coating operation: 0.46 kilogram of VOC per liter of coating solids
 for the interior body coating operation: 4.2 pounds of VOC per gallon coating, excluding water and exempt solvents
 for the basecoat coating operation: 2.8 pounds of VOC per gallon coating, excluding water and exempt solvents

OAC rule 3745-31-05 (PTI #03-10973)

for the overvarnish coating operation: 2.8 pounds of VOC per gallon coating, excluding water and exempt solvents
 40.72 lbs VOC/hr (including cleanup), 145.96 tons VOC/year (including cleanup materials) (see A.I.2.c)
 0.29 lb particulate emissions (PE)/hr, 1.27 tons PE/year
 0% opacity, as a 6-minute average
 for the burning of natural gas:
 2.12 lbs NOx/hr, 9.29 tons NOx/year
 0.128 lb VOC/hr, 0.56 ton VOC/year

2. **Additional Terms and Conditions**

- a. This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Hancock County.
- c. The permittee shall employ (based upon the monthly VOC input rates) no more than 145.96 tons of VOC per rolling, 12-month period (including cleanup materials).
- d. The 40.72 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- e. The 2.12 lbs NOx/hr and 0.128 lb VOC/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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II. **Operational Restrictions**

- 1. Each coating employed in this emissions unit shall comply with the VOC content restrictions specified in A.I of the terms and conditions, on an "as applied" basis.
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. **Monitoring and/or Record Keeping Requirements**

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10973, issued on March 24, 1999: paragraphs 2 & 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- 2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 3. The permittee shall maintain monthly records that list the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;

- b. the VOC content of each coating, in lbs/gallon of coating and in lbs/gallon of coating excluding water and exempt solvents;

(Note: If the permittee mixes compliant coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.)

- c. the type (i.e., interior body spray, exterior basecoat, overvarnish, and exterior bottom end) and VOC content of each coating (i.e., in kg/liter of coating solids, as applied);
- d. the number of gallons of each coating employed;
- e. the VOC emission rate for each coating employed (b x d), in pounds;
- f. the VOC emission rate for all the coatings employed (summation of e for all coatings), in tons;
- g. the VOC content of each cleanup material employed, in pounds per gallon;
- h. the number of gallons of each cleanup material employed;
- i. the VOC emission rate for each cleanup material employed (g x h), in pounds;
- j. the VOC emission rate for all the cleanup materials employed (summation of i for all cleanup materials), in tons;
- k. the total VOC emission rate for all the coatings and cleanup materials employed (f + j), in tons; and
- l. the rolling, 12-month summation of the monthly VOC emission rates for all the coatings and cleanup materials employed, in tons.

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IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10973, issued on March 24, 1999: paragraphs 2 - 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 145.96 tons.
5. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
 - 0.89 kilogram of VOC per liter of coating solids, as applied (for interior body spray coating)
 - 0.29 kilogram of VOC per liter of coating solids, as applied (for exterior bottom end coating)
 - 0.46 kilogram of VOC per liter of coating solids, as applied (for overvarnish spray coating)
 - 4.2 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied (for interior body spray coating)
 - 2.8 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied (for overvarnish spray coating)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitations above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitations above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.
 - b. Emission Limitations:

for the burning of natural gas: 0.128 pound of VOC per hour, 0.56 ton of VOC per year

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the appropriate emission factor from AP-42, Table 1.4-2 (revised 7/98) [5.5 lbs VOC/mmcu.ft], and then dividing by the maximum heat input capacity of the burners (mmBtu/hr).

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

c. Emission Limitation:

40.72 pounds of VOC per hour

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation as follows:

i. multiply the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all the coatings employed (lbs/gallon);

ii. multiply the maximum hourly cleanup material usage rate (gallons/hr) by the maximum VOC content of all the cleanup materials (lbs/gallon); and

iii. add 1.c.i + 1.c.ii.

If required, the permittee shall demonstrate compliance pursuant to Method 25 of 40 CFR Part 60, Appendix A.

d. Emission Limitations:

0.29 pound of PE per hour and 1.27 tons of PE per year (from coating usage)

Applicable Compliance Method:

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

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (40%, considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

e. Emission Limitation:

0% opacity, as a 6-minute average

Applicable Compliance Method:

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

f. Emission Limitation:

145.96 tons VOC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the limitation above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

g. Emission Limitations:

for the burning of natural gas: 2.12 pounds of NOx/hr, 9.29 tons of NOx/year

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the appropriate emission factor from AP-42, Table 1.4-1 (revised 7/98) [100 lbs NOx/mmcu.ft], and then dividing by the maximum heat input capacity of the burners (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly emission limitation pursuant to Method 7 of 40 CFR Part 60, Appendix A.

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

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0332000023 Emissions Unit ID: K002 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage container manufacturing line	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit K002 was evaluated based on the actual materials (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 Toxics 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: isopropyl alcohol
 TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.53
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 190.30
 MAGLC (ug/m3): 23,404.76

2. 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:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, 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
 - c. 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.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxic Policy."
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0332000023 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
two-piece steel food can manufacturing line (can line #3)	OAC rule 3745-17-07	None (see A.I.2.a)
	OAC rule 3745-17-11	None (see A.I.2.b)
	OAC rule 3745-21-09(D)	for the interior body coating operation: 4.2 pounds of VOC per gallon coating, excluding water and exempt solvents
	OAC rule 3745-31-05 (PTI #03-10973)	63.1 lbs VOC/hr (including cleanup)
		196.16 tons VOC/year (including cleanup) (see A.I.2.d)
		1.06 lbs particulate emissions (PE)/hr
		for the burning of natural gas:
		1.08 lbs NOx/hr
		0.06 lb VOC/hr
		See A.2.c.
	40 CFR part 60,Subpart WW	Exempt, see A.2.g.
2. Additional Terms and Conditions		
a.	This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.	
b.	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Hancock County.	
c.	The permittee shall employ no more than 600 gallons of cleanup materials per rolling, 12-month period.	
d.	The VOC emissions (for all the coatings and cleanup materials) shall not exceed 196.16 tons of VOC per rolling, 12-month period.	
e.	The 63.1 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.	
f.	The 1.08 lbs NOx/hr and 0.06 lb VOC/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.	
g.	This emissions unit is not subject to the requirements of 40 CFR part 60,Subpart WW because it is a steel food container manufacturing line.	

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II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content restriction specified in A.I of the terms and conditions, on an "as applied" basis.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10642, issued on December 23, 1997: paragraphs 2 & 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

3. The permittee shall maintain monthly records that list the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating, in lbs/gallon of coating and in lbs/gallon of coating excluding water and exempt solvents;

(Note: If the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.)

 - c. the number of gallons of each coating employed;
 - d. the VOC emission rate for each coating employed (b x c), in pounds;
 - e. the VOC emission rate for all the coatings employed (summation of d for all coatings), in tons;
 - f. the VOC content of each cleanup material employed, in pounds per gallon;
 - g. the number of gallons of each cleanup material employed;
 - h. the VOC emission rate for each cleanup material employed (f x g), in pounds;
 - i. the VOC emission rate for all the cleanup materials employed (summation of h for all cleanup materials), in tons;
 - j. the total VOC emission rate for all the coatings and cleanup materials employed (e + i), in tons;
 - k. the rolling, 12-month summation of the monthly VOC emission rates for all the coatings and cleanup materials employed, in tons;
 - l. the total number of gallons of all the cleanup materials employed; and
 - m. the rolling, 12-month summation of the monthly numbers of gallons of all the cleanup materials employed.

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IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10642, issued on December 23, 1997: paragraphs 2 - 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - i. all exceedances of the rolling, 12-month VOC limitation of 196.16 tons; and
 - ii. all exceedances of the rolling, 12-month cleanup materials usage limitation of 600 gallons.
5. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
4.2 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.
 - b. Emission Limitation:
for the burning of natural gas: 0.06 pound of VOC per hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the appropriate emission factor from AP-42, Table 1.4-2 (revised 7/98) [5.5 lbs VOC/mmcu.ft], and then dividing by the maximum heat input capacity of the burners (mmBtu/hr).

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

- c. **Emission Limitation:**
63.1 pounds of VOC per hour
- Applicable Compliance Method:**
The permittee may demonstrate compliance with this limitation as follows:
- i. multiply the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all the coatings employed (lbs/gallon);
 - ii. multiply the maximum hourly cleanup material usage rate (gallons/hr) by the maximum VOC content of all the cleanup materials employed (lbs/gallon); and
 - iii. add 1.c.i + 1.c.ii.
- If required, the permittee shall demonstrate compliance pursuant to Method 25 of 40 CFR Part 60, Appendix A.
- d. **Emission Limitation:**
1.06 lbs/hr PE (from coating usage)
- Applicable Compliance Method:**
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operation:
- E = particulates emission rate (lbs/hr)
- E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-CE)
- TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (40%, considering 40 CFR 60.453)
- CE = control efficiency of the control equipment (assumed to be 90%)
- If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC rule 3745-17-03(B)(10).
- e. **Emission Limitation:**
196.16 tons VOC/rolling, 12-month period
- Applicable Compliance Method:**
Compliance with the limitation above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.
- f. **Emission Limitation:**
for the burning of natural gas: 1.08 pounds of NOx/hr
- Applicable Compliance Method:**
The permittee shall demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the appropriate emission factor from AP-42, Table 1.4-1 (revised 7/98) [100 lbs NOx/mmcu.ft], and then dividing by the maximum heat input capacity of the burners (mmBtu/hr).
- If required, the permittee shall demonstrate compliance with the hourly emission limitation pursuant to Method 7 of 40 CFR Part 60, Appendix A.
- g. **Usage Restriction:**
600 gallons/rolling, 12-month period (for cleanup material usage)
- Applicable Compliance Method:**
Compliance with the limitation above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0332000023 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece steel food can manufacturing line (can line #3)	none	none

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit K003 was evaluated based on the actual materials (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 Toxics 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: n-butanol
 TLV (mg/m3): 152
 Maximum Hourly Emission Rate (lbs/hr): 63.1
 Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 855.1
 MAGLC (ug/m3): 2,667.24

- 2. 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:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, 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
 - c. 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.

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

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0332000023 Emissions Unit ID: K004 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
interior body coating (respray) line	OAC rule 3745-17-07	None (see A.I.2.a)
	OAC rule 3745-17-11	None (see A.I.2.b)
	OAC rule 3745-21-09(D)	for the interior body coating operation: 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05 (PTI #03-10973)	7.0 lbs VOC/hr (including cleanup)
		1.81 tons VOC/year (including cleanup) (see A.2.c)

0.1 lb particulate emissions (PE)/hr

0% opacity, as a 6-minute average

for the burning of natural gas emissions: 0.1 lb NOx/hr

for the interior body coating operation: 0.89
kilogram/liter of coating solids, as applied

40 CFR part 60, Subpart WW

2. Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Hancock County.
- c. The VOC emissions (for all the coatings and cleanup materials) shall not exceed 1.81 tons of VOC per rolling, 12-month period.
- d. The 7.0 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- f. The 0.1 lb NOx/hr emission limitation for natural gas combustion was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

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II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content restrictions specified in A.I of the terms and conditions, on an "as applied" basis.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10804, issued on November 18, 1998; paragraphs 2 & 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall maintain monthly records that list the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating, in lbs/gallon of coating and in lbs/gallon of coating excluding water and exempt solvents;

(Note: If the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.)
 - c. the VOC content of each coating, in kilogram/gallon of coating solids, as applied;
 - d. the number of gallons of each coating employed;
 - e. the VOC emission rate for each coating employed (b x d), in pounds;
 - f. the VOC emission rate for all the coatings employed (summation of e for all coatings), in tons;
 - g. the VOC content of each cleanup material employed, in pounds per gallon;
 - h. the number of gallons of each cleanup material employed;
 - i. the VOC emission rate for each cleanup material employed (g x h), in pounds;
 - j. the VOC emission rate for all the cleanup materials employed (summation of i for all cleanup materials), in tons;

- k. the total VOC emission rate for all the coatings and cleanup materials employed (f + j), in tons; and
- l. the rolling, 12-month summation of the monthly VOC emission rates, for all the coatings and cleanup materials employed, in tons.

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IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10804, issued on November 18, 1998: paragraphs 2 - 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 1.81 tons.
5. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
4.2 pounds of VOC per gallon coating, excluding water and exempt solvents, as applied

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.
 - b. Emission Limitation:
0.89 kilogram of VOC per gallon of coating solids, as applied

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based on the monitoring and record keeping requirements specified in section A.III.3 of the terms and conditions of this permit.
 - c. Emission Limitation:
7.0 pounds of VOC per hour

Applicable Compliance Method:
The permittee may demonstrate compliance with the limitation above as follows:
 - i. multiply the maximum hourly coating usage rate (gallons/hr) by the maximum VOC content of all the coatings employed (lbs/gallon);
 - ii. multiply the maximum hourly cleanup material usage rate (gallons/hr) by the maximum VOC content of all the cleanup materials employed (lbs/gallon); and
 - iii. add 1.c.i + 1.c.ii.
 If required, the permittee shall demonstrate compliance pursuant to Method 25 of 40 CFR Part 60, Appendix A.
 - d. Emission Limitation:
0.1 lb/hr PE (from coating usage)

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

E = particulates emission rate (lbs/hr)

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (40%, considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

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

- e. Emission Limitation:
1.81 tons VOC/rolling, 12-month period

Applicable Compliance Method:
Compliance with the limitation above shall be based upon the record keeping requirements specified in section A.III.3 of this permit.
 - f. Emission Limitation:
for the burning of natural gas: 0.10 pound of NOx/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation above by multiplying the maximum hourly natural gas consumption rate (mmcu ft./hr) by the appropriate emission factor from AP-42, Table 1.4-1 (revised 7/98) [100 lbs NOx/mmcu.ft], and then dividing by the maximum heat input capacity of the burners (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly emission limitation pursuant to Method 7 of 40 CFR Part 60, Appendix A.
2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0332000023 Emissions Unit ID: K004 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0332000023 Emissions Unit ID: P021 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
conversion press XX	OAC rule 3745-21-07(G) OAC rule 3745-31-05 (PTI #03-6665)	None (see A.II) 3.36 pounds of volatile organic compounds (VOC)/hr See A.2.

2. Additional Terms and Conditions

- a. The VOC content of each tab lube material employed in this emissions unit shall not exceed 5.83 lbs/gallon of tab lube material.
- b. The usage rates for the tab lube and cleanup materials shall not exceed the following:
 - a. tab lube materials - 3.9 gallons per million ends (22.74 lbs VOC/million ends); and
 - b. cleanup materials - 0.91 gallon per million ends (6.0 lbs VOC/million ends).
- c. The 3.36 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- d. The VOC content of each cleanup material employed in this emissions unit shall not exceed 6.59 lbs/gallon of cleanup material.

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II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-6665, issued on July 21, 1993: paragraph 2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall calculate and record each month the following information for this emissions unit:
 - a. the name and identification number of each tab lube material and cleanup material employed;
 - b. documentation on whether or not each tab lube material and each cleanup material employed is a photochemically reactive material;
 - c. the VOC content of each tab lube material and each cleanup material employed, in pounds per gallon;
 - d. the total gallons of all the tab lube materials employed (excluding the VOC portion of any waste materials recycled and/or sent off site for disposal);
 - e. the total gallons of all the cleanup materials employed (excluding the VOC portion of any waste materials recycled and/or sent off site for disposal);
 - f. the number of ends produced, in millions;
 - g. the calculated usage rate of all the tab lube materials employed, in gallons/million ends (d/f); and
 - h. the calculated usage rate for all the cleanup materials employed, in gallons/million ends (e/f).

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IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-6665, issued on July 21, 1993: paragraph 2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each month during which any photochemically reactive material was employed;
 - b. all exceedances of the VOC content limitation of 5.83 lbs/gallon of tab lube material and 6.59 lbs/gallon of cleanup material; and
 - c. all exceedances of the usage restrictions of 3.9 gallons/million ends and 0.91 gallon/million ends.

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V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
3.36 pounds of VOC per hour

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly VOC emission limitation above by using the following formula:

$$\text{lbs VOC/hr} = a + b$$

Where:

a = the maximum tab lube material usage rate per hour (gallons per million ends) multiplied by the maximum number of ends produced per hour (million per hour), and then multiplied by the maximum VOC content of the tab lube materials (pounds per gallon)

b = the maximum cleanup material usage rate per hour (gallons per million ends) multiplied by the maximum number of ends produced per hour (million per hour), and then multiplied by the maximum VOC content of the cleanup materials (pounds per gallon)

- b. Emission Limitations:
 5.83 pounds of VOC per gallon of tab lube material
 6.59 pounds of VOC per gallon of cleanup material

Applicable Compliance Method:
 The permittee shall demonstrate compliance with the VOC content limitations above based on the monitoring and record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

- c. Emission Limitations:
 3.9 gallons/million ends (for the tab lube material usage)
 0.9 gallon/million ends (for the cleanup material usage)

Applicable Compliance Method:
 The permittee shall demonstrate compliance with the usage limitations above based on the monitoring and record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

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VI. **Miscellaneous Requirements**

- 1. The permittee shall continue to investigate (a) the use of lower VOC content tab lubes and cleanup solutions and (b) ways to reduce the application rates of tab lubes and cleanup solutions. The permittee shall provide the Northwest District Office, Division of Air Pollution Control with an annual written report on the progress in these areas. These reports shall be due by February 15th of each year.

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Facility ID: 0332000023 Emissions Unit ID: P021 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0332000023 Emissions Unit ID: P022 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
conversion press YY	OAC rule 3745-21-07(G) OAC rule 3745-31-05 (PTI #03-6665)	None (see A.II) 3.36 pounds of volatile organic compounds (VOC)/hr See A.2.

2. Additional Terms and Conditions

- a. The VOC content of each tab lube material employed in this emissions unit shall not exceed 5.83 lbs/gallon of tab lube material.
- b. The usage rates for the tab lube and cleanup materials shall not exceed the following:
 - a. tab lube materials - 3.9 gallons per million ends (22.74 lbs VOC/million ends); and
 - b. cleanup materials - 0.91 gallon per million ends (6.0 lbs VOC/million ends).
- c. The 3.36 lbs VOC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- d. The VOC content of each cleanup material employed in this emissions unit shall not exceed 6.59 lbs/gallon of cleanup material.

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-6665, issued on July 21, 1993: paragraph 2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall calculate and record each month the following information for this emissions unit:
 - a. the name and identification number of each tab lube material and cleanup material employed;
 - b. documentation on whether or not each tab lube material and each cleanup material employed is a photochemically reactive material;
 - c. the VOC content of each tab lube material and each cleanup material employed, in pounds per gallon;
 - d. the total gallons of all the tab lube materials employed (excluding the VOC portion of any waste materials recycled and/or sent off site for disposal);
 - e. the total gallons of all the cleanup materials employed (excluding the VOC portion of any waste materials recycled and/or sent off site for disposal);
 - f. the number of ends produced, in millions;
 - g. the calculated usage rate of all the tab lube materials employed, in gallons/million ends (d/f); and
 - h. the calculated usage rate for all the cleanup materials employed, in gallons/million ends (e/f).

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IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-6665, issued on July 21, 1993: paragraph 2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each month during which any photochemically reactive material was employed;
 - b. all exceedances of the VOC content limitation of 5.83 lbs/gallon of tab lube material and 6.59 lbs/gallon of cleanup material; and
 - c. all exceedances of the usage restrictions of 3.9 gallons/million ends and 0.91 gallon/million ends.

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V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
3.36 pounds of VOC per hour

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly VOC emission limitation above by using the following formula:

$$\text{lbs VOC/hr} = a + b$$

Where:

a = the maximum tab lube material usage rate per hour (gallons per million ends) multiplied by the maximum number of ends produced per hour (million per hour), and then multiplied by the maximum VOC content of the tab lube materials (pounds per gallon)

b = the maximum cleanup material usage rate per hour (gallons per million ends) multiplied by the maximum number of ends produced per hour (million per hour), and then multiplied by the maximum VOC content of the cleanup materials (pounds per gallon)
 - b. Emission Limitations:
5.83 pounds of VOC per gallon of tab lube material
6.59 pounds of VOC per gallon of cleanup material

Applicable Compliance Method:
 The permittee shall demonstrate compliance with the VOC content limitations above based on the monitoring and record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

- c. Emission Limitations:
 - 3.9 gallons/million ends (for the tab lube material usage)
 - 0.9 gallon/million ends (for the cleanup material usage)

Applicable Compliance Method:
 The permittee shall demonstrate compliance with the usage limitations above based on the monitoring and record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

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VI. **Miscellaneous Requirements**

- 1. The permittee shall continue to investigate (a) the use of lower VOC content tab lubes and cleanup solutions and (b) ways to reduce the application rates of tab lubes and cleanup solutions. The permittee shall provide the Northwest District Office, Division of Air Pollution Control with an annual written report on the progress in these areas. These reports shall be due by February 15th of each year.

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Facility ID: 0332000023 Emissions Unit ID: P022 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None