OhioEPA
State of Ohio Environmental Protection Agency

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1800 WaterMark Drive
Columbus, OH 43215-1099

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MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

Permit Type Summary

X	TOXIC REVIEW
	PSD
X	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED

August 11, 1999
STARK COUNTY
Phoenix Packaging Company - Warner
David E Blizzard
PO Box 2290
North Canton, OH 44720

RE: Permit To Install Number 15-1328 **ADMINISTRATIVE MODIFICATION**

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

RECEIVED
AUG 16 1999
CANTON CITY HEALTH DEPT
POLLUTION DIVISION

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

Enclosure

cc: USEPA
CANTON CITY HEALTH DEPTARTMENT

OhioEPA

State of Ohio Environmental Protection Agency

Permit To Install
Terms and Conditions

Date of Issuance: 08/11/1999

Effective Date: 08/11/1999

MODIFICATION TO PERMIT TO INSTALL 15-1328

Application Number: 15-1328
Facility ID: 1576051610
Permit Fee: $2200.00
Name of Applicant: Phoenix Packaging Company - Warner
Address: PO Box 2290
City: North Canton, OH 44720

Location of proposed source(s): 2121 WARNER ROAD SE
CANTON, OHIO

Description of proposed source(s):
10 END SEAL; 7 LUBRICANT/RUST INHIBITOR; AND 8 REPAIR COAT COATING LINES FOR FINISHED 2 &3 PIECE CAN ENDS.

The Reason for the modification is:
Modification to PTI #15-1328 issued 10/16/98 to allow change of composition of materials for coating line, pgs 15, 16,17,18,27, 29, 31, 32, 33, 34, 35, 36, 37, 38,39, & 40 of 40 pages.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Phoenix Packaging Company - Warner** located in **Stark** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K015	Line 208, air gun spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (D)(1)(e) and (2)(e) (1/17/95) 3745-31-05 (4/27/98)	BAT is more stringent 0.00 pound VOC/gallon of coating, excluding water and exempt solvents 244 gal/rolling, 365 day summation period of cleanup material (6.6 lbs VOC/gal) 0.80 ton VOC/rolling, 365 day summation period
K016	Line 208, wipe application of lubricant, to unconverted can ends for tab attachment in conversion press.	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(2)(e)(ii) (1/17/95) 3745-31-05 (4/27/98)	Use of less than 10 gal/day of lubricant. Per rolling, 365 day summation

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K016 Cont'd	(existing modified)			period: 588 gal. of lubricant 1.63 tons VOC/rolling, 365 day summation period
K017	Line 202, air gun spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (D)(1)(e) and (2)(e) (1/17/95) 3745-31-05 (4/27/98)	BAT is more stringent 0.00 pound VOC/gallon of coating, excluding water and exempt solvents 244 gal/rolling, 365 day summation period of cleanup material (6.6 lbs VOC/gal) 0.80 ton VOC/rolling, 365 day summation period
K018	Line 202, electrolytic dip application of repair coat material to converted can ends with convection oven operating	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(1)(i) (1/17/95) 3745-31-05 (4/27/98)	BAT is more stringent 2.97 pounds VOC/gallon of coating, excluding water and exempt solvents

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K018 Cont'd	at 425 degrees Fahrenheit (existing modified)			12,432 gal/rolling, 365 day summation period of repair coat 1.06 tons VOC/rolling, 365 day summation period
K019	Line 202, wipe application of lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(2)(e)(ii) (1/17/95) 3745-31-05 (4/27/98)	Use of less than 10 gal/day of lubricant, rust inhibitor, and repair coat combined Per rolling, 365 day summation period: 588 gal. of lubricant; 319 gal of rust inhibitor; and 1,277 gal. of repair coat 2.26 tons VOC/rolling, 365 day summation period
K020	Line 203, air gun spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.	Compliance with the applicable OAC regulations and the terms and conditions of this permit. Compliance with Ohio EPA "Air Toxics Policy."	3745-21-09 (D)(1)(e) and (2)(e) (1/17/95) 3745-31-05 (4/27/98)	3.7 pounds VOC/gallon of coating, excluding water and exempt solvents 12,096 gal/rolling, 365 day summation

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
				period of end seal compound
K020 Cont'd	(existing modified)			22.32 tons VOC/rolling, 365 day period
K021	Line 203, wipe application of lubricant and rust inhibitor to unconverted can ends for tab attachment in conversion press. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(2)(e)(ii) (1/17/95)	Use of less than 10 gal/day of lubricant, rust inhibitor, and repair coat combined
			3745-31-05 (4/27/98)	1176 gal/rolling, 365 day summation period of lubricant; and 445 gal/rolling, 365 day summation period of rust inhibitor
				4.67 tons VOC/rolling, 365 day summation period
K031	Line 207, air gun spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (D)(1)(e) and (2)(e) (1/17/95)	BAT is more stringent
			3745-31-05 (4/27/98)	0.00 pound VOC/gallon of coating, excluding water and exempt solvents

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K031 Cont'd	(existing modified)			244 gal/rolling, 365 day summation period of cleanup material (6.6 lbs VOC/gal) 0.80 ton VOC/rolling, 365 day summation period
K023	Line 204, electrolytic dip application of repair coat material to converted can ends with convection oven operating at 425 degrees Fahrenheit (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(1)(i) (1/17/95) 3745-31-05 (4/27/98)	BAT is more stringent 2.97 pounds VOC/gallon of coating, excluding water and exempt solvents 8,285 gal/rolling, 365 day summation period of repair coat 0.70 ton VOC/rolling, 365 day summation period
K024	Line 204, wipe application of lubricant, rust inhibitor, and repair coat to unconverted can ends for	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(2)(e)(ii) (1/17/95) 3745-31-05 (4/27/98)	Use of less than 10 gal/day of lubricant, rust inhibitor, and repair coat combined Per rolling, 365 day

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K024 Cont'd	tab attachment in conversion press. (existing modified)			summation period: 588 gal. of lubricant; 292 gal of rust inhibitor; and 1,168 gal of repair coat 2.20 tons VOC/rolling, 365 day summation period
K025	Line 205, air gun spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit. Compliance with Ohio EPA "Air Toxics Policy."	3745-21-09 (D)(1)(e) and (2)(e) (1/17/95) 3745-31-05 (4/27/98)	3.7 pounds VOC/gallon of coating, excluding water and exempt solvents Per rolling, 365 day summation period: 7245 gal of end seal compound, and 851 gal of cleanup material (5.6 pounds VOC/gal) 15.75 tons VOC/rolling, 365 day summation period
K026	Line 205, electrolytic dip application of repair coat material to converted	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(1)(i) (1/17/95) 3745-31-05 (4/27/98)	BAT is more stringent 2.97 pounds VOC/gallon of

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K026 Cont'd	can ends with convection oven operating at 425 degrees Fahrenheit (existing modified)			coating, excluding water and exempt solvents 15,698 gal/rolling, 365 day summation period of repair coat 1.33 tons VOC/rolling, 365 day summation period
K027	Line 205, wipe application of lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(2)(e)(ii) (1/17/95) 3745-31-05 (4/27/98)	Use of less than 10 gal/day of lubricant, rust inhibitor, and repair coat combined Per rolling, 365 day summation period: 588 gal. of lubricant; 342 gal of rust inhibitor; and 1,369 gal of repair coat 2.30 tons VOC/rolling, 365 day summation period
K028	Line 206, air gun spray application of an end	Compliance with the applicable OAC regulations and the terms and conditions	3745-21-09 (D)(1)(e) and (2)(e) (1/17/95)	3.7 pounds VOC/gallon of coating, excluding water

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
				and exempt solvents
K028 Cont'd	seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (existing modified)	of this permit. Compliance with Ohio EPA "Air Toxics Policy."	3745-31-05 (4/27/98)	Per rolling, 365 day summation period: 6048 gal of end seal compound, and 851 gal of cleanup material (5.6 pounds VOC/gal) 13.54 tons VOC/rolling, 365 day summation period
K030	Line 206, wipe application of lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(2)(e)(ii) (1/17/95) 3745-31-05 (4/27/98)	Use of less than 10 gal/day of lubricant, rust inhibitor, and repair coat combined Per rolling, 365 day summation period: 588 gal. of lubricant; 292 gal of rust inhibitor; and 1,168 gal of repair coat 2.20 tons VOC/rolling, 365 day summation period
K022	Line 204, air gun spray	Compliance with the applicable OAC	3745-21-09 (D)(1)(e) and	3.7 pounds VOC/gallon of

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K022 Cont'd	application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (existing modified)	regulations and the terms and conditions of this permit. Compliance with Ohio EPA "Air Toxics Policy."	(2)(e) (1/17/95) 3745-31-05 (4/27/98)	coating, excluding water and exempt solvents Per rolling, 365 day summation period: 6531 gal of end seal compound, and 851 gal of cleanup material (5.6 pounds VOC/gal) 14.43 tons VOC/rolling, 365 day summation period
K032	Line 207, electrolytic dip application of repair coat material to converted can ends with convection oven operating at 425 degrees Fahrenheit (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(1)(i) (1/17/95) 3745-31-05 (4/27/98)	BAT is more stringent 2.97 pounds VOC/gallon of coating, excluding water and exempt solvents 12,432 gal/rolling, 365 day summation period of repair coat 1.06 tons VOC/rolling, 365 day summation period

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K033	Line 207, wipe application of lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press. (existing modified)	Compliance with the applicable OAC regulations and the terms and conditions of this permit.	3745-21-09 (U)(2)(e)(ii) (1/17/95) 3745-31-05 (4/27/98)	Use of less than 10 gal/day of lubricant, rust inhibitor, and repair coat combined Per rolling, 365 day summmary period: 588 gal of lubricant; 319 ga; pf rist omjobotpr' amd 1,277 gal of repair coat 2.26 tons VOC/rolling, 365 day summation period.

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Volatile organic compounds	90.19
Combined HAPs	24.0
Any single HAP	9.0

Note: **The information contained under the Summary of Emissions section of the Permit to Install is for informational purposes only and is not enforceable.**

CONSTRUCTION STATUS

The **Canton Air Pollution Control** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **K034, K035, K036, K037, K038, and K039.**

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Canton Air Pollution Control, 420 Market Ave. North, Canton, OH 44702-1544.**

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

I. Emissions Units K015, K017, and K031 (The following conditions apply per emissions unit unless otherwise specified below)

A. Operational Restrictions (K015, K017, and K031)

1. Only coatings which comply with the allowable emission limit established in accordance with BAT - 0.00 pound VOC/gal of coating, excluding water and exempt solvents - shall be used in this emissions unit.

2. The maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling 365-day summation of the amount of cleanup material used each day. The VOC content of the cleanup material shall not exceed 6.6 lbs/gal. Other materials may used if approved by the Canton City Health Department, Air Pollution Control Division prior to initial use.

3. For emissions units K015, K017, and K031, existing coating usage data is available to demonstrate compliance with the cleanup usage limit in Additional Special Term and Condition I.A.2.

B. Monitoring and/or Recordkeeping Requirements (K015, K017, and K031)

1. 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, as applied;

b. the VOC content, in pounds of VOC per gallon, of each coating (excluding water and exempt solvents), as applied;

c. the VOC content, in pounds of VOC per gallon, of each coating, as applied;

d. the individual HAP content for each HAP of each coating and cleanup material employed, in pounds of individual HAP per gallon of coating and/or cleanup material, as applied;

e. the number of gallons of each coating employed;

f. the total VOC emissions from all coatings employed, in pounds or tons;

g. the number of gallons of cleanup material employed;

h. the rolling, 365-day summation of the gallons of cleanup material employed;

i. the VOC content of the cleanup material;

j. the total VOC emissions from the cleanup material employed, in pounds/day;

k. the rolling, 365-day summation of VOC emissions, in tons/year;

l. the total HAP emissions, both single and combined, from each coating and cleanup material employed, in pounds/day; and,

m. the rolling, 365-day summation of HAP emissions, both single and combined, in tons/year.

If the permittee mixes complying coatings at the line, it is not necessary to record the VOC content of the resulting mixture.

C. **Reporting Requirements**
(K015, K017, and K031)

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHDAPCD) 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 CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall notify the CCHDAPCD in writing of any exceedance of the 244 gal of cleanup material/rolling, 365 day summation period. The notification shall include a copy of such record and shall be sent to the CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

D. Compliance Methods and Emission Testing Requirements (K015, K017, and K031)

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

a. Emission Limitation

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

Applicable Compliance Method

Method 24 of 40 CFR Part 60, Appendix A.

b. Emission Limitation

0.80 ton/rolling, 365 day summation period of volatile organic compounds

Applicable Compliance Method

Emissions are due to the use of cleanup material. Therefore, maintain records of the rolling, 365 day summation of the gallons of cleanup material used. Calculate the VOC emissions using the VOC content (in lbs/gal) of the cleanup material. Recordkeeping and reporting per Additional Special Terms and Conditions I.B and I.C above.

E. Miscellaneous Requirements
(K015, K017, and K031)

1. The following Additional Special Terms and Conditions shall supersede all of the air pollution control requirements contained in the permit to install (application number 15-640) issued for these emissions units on April 10, 1991: I.A, I.B, I.C, and I.D.

II. Emissions Units K020, K025, K028, and K022 (The following conditions apply per emissions unit unless otherwise specified below)

A. Operational Restrictions
(K020, K025, K028, and K022)

1. Only coatings which comply with the allowable emission limit established in accordance with OAC Rule 3745-21-09(D) 3.7 lbs VOC/gal of coating, excluding water and exempt solvents - shall be used in this emissions unit.

2. The maximum annual amount (in gallons/year) of coating used shall not exceed the following, based upon a rolling 365-day summation of the amount of coating used each day:

Emissions Unit	coating (gal/yr)
K020	12,096
K025	7,245
K028	6,048
K022	6,531

3. The maximum annual cleanup material used for K025, K028, and K022 shall not exceed 851 gallons (for each emissions unit), based upon a rolling 365-day summation of the amount of cleanup material used each day. The VOC content of the cleanup material shall not exceed 5.6 lbs/gal. Other materials may used if approved by the Canton City Health Department, Air Pollution Control Division prior to initial use.

4. For emissions unit K020, K025, K028 and K022, existing coating and cleanup usage data is available to demonstrate compliance with the usage limits contained in Additional Special Terms and Conditions II.A.2. and II.A.3.

B. Monitoring and/or Recordkeeping Requirements (K020; K025; K028; and K022)

1. 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, as applied;

   b. the VOC content, in pounds of VOC per gallon, of each coating (excluding water and exempt solvents), as applied;

   c. the VOC content, in pounds of VOC per gallon, of each coating, as applied;

   d. the individual HAP content for each HAP of each coating and cleanup material, in pounds of HAPs per gallon of coating or cleanup material, as applied;

   e. the number of gallons of each coating employed per day;

   f. the rolling, 365-day summation of the amount of coatings employed, in gallons per year;

   g. the total VOC emissions from all coatings employed, in pounds or tons per day;

   h. the rolling, 365-day summation of the VOC emissions from the coatings employed, in tons per year;

   i. the number of gallons of cleanup material employed per day;

   j. the rolling, 365-day summation of the gallons of cleanup material employed per year;

   k. the VOC content of the cleanup material;

l. the total VOC emissions from the cleanup material employed, in pounds/day;

m. the rolling, 365-day summation of VOC emissions from the cleanup material, in tons/year;

n. the total HAP emissions, both single and combined, from all coatings and cleanup material employed, in pounds or tons per day; and,

o. the rolling, 365- day summation of the HAP emissions, both single and combined, from the coatings employed, in tons per year.

If the permittee mixes complying coatings at the line, it is not necessary to record the VOC content of the resulting mixture.

C. **Reporting Requirements**
(K020, K025, K028, and K022)

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHDAPCD) 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 CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall notify the CCHDAPCD in writing of any exceedance of the rolling, 365 day coating usage limitations denoted in Condition A.2. The notification shall include a copy of such record and shall be sent to the CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

3. For emissions units K025, K028, and K022, the permittee shall notify the CCHDAPCD in writing of any exceedance of the 851 gal of cleanup/rolling, 365 day period. The notification shall include a copy of such record and shall be sent to the CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

D. Compliance Methods and Emission Testing Requirements (K020, K025, K028, and K022)

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

a. Emission Limitation

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

Applicable Compliance Method

Method 24 of 40 CFR Part 60, Appendix A.

b. Emission Limitation

tons VOC/rolling, 365-day summation period

Emissions Unit	VOCs (tpy)
K020	22.32
K025	15.75
K028	13.54
K022	14.43

Applicable Compliance Method

Maintain records of the rolling, 365 day summation of the gallons of coating and cleanup material used. Calculate the VOC emissions using the corresponding VOC contents (in lbs/gal) of the coating and cleanup materials employed and divide by 2000 lbs/ton. Calculate the HAP emissions using the HAP content (in lbs/gal) of each coating and cleanup material employed and divide by 2000 lbs/ton. Recordkeeping and reporting per Additional Special Terms and Conditions II.B and II.C above.

E. Miscellaneous Requirements (K020, K025, K028, and K022)

1. The following Additional Special Terms and Conditions shall supersede all of the air pollution

control requirements contained in the permit to install (application number 15-640) issued for these emissions units on April 10, 1991: II.A, II.B, II.C, and II.D.

III. Emissions Units K016, K019, K021, K024, K027, K030, and K033 (The following conditions apply per emissions unit unless otherwise specified below)

A. Operational Restrictions (K016, K019, K021, K024, K027, K030, and K033)

1. The maximum daily coating usage shall not exceed 10 gallons per day combined for the rust inhibitor, lubricant, and repair coat employed.

2. The maximum annual amount (in gallons/year) of coating used shall not exceed the following, based upon a rolling 365-day summation of the amount of coating used each day:

Emissions Unit	Lubricant (gal/yr)	Rust Inhibitor (gal/yr)	Repair Coat (gal/yr)
K016	588		
K019	588	319	1,277
K021	1176	445	NA
K024	588	292	1,168
K027	588	342	1,369
K030	588	292	1,168
K033	588	319	1,277

3. For emissions units K016, K019, K021, K024, K027, K030, and K033, existing coating usage data is available to demonstrate compliance with the usage limits contained in Additional Special Term and Condition III.A.2.

B. Monitoring and/or Recordkeeping Requirements (K016, K019, K021, K024, K027, K030, and K033)

1. The permittee shall collect and record the following information each day for the emissions

unit (Note: "Coating" includes lubricant, rust inhibitor, and repair coat):

a. the name and identification number of each coating and cleanup material, as applied;

b. the VOC content, in pounds of VOC per gallon, of each coating, as applied;

c. the individual HAP content for each HAP of each coating employed, in pounds of individual HAP per gallon of coating, as applied;

d. the number of gallons of each coating employed per day;

e. the rolling, 365-day summation of the amount of each coating employed, in gallons per year;

f. the total VOC emissions from all coatings employed, in pounds or tons per day;

g. the rolling, 365-day summation of the VOC emissions, in tons per year;

h. the total HAP emissions, both single and combined, from each coating employed, in pounds/day; and,

i. the rolling, 365-day summation of HAP emissions, both single and combined, in tons/year.

C. **Reporting Requirements**
(K016, K019, K021, K024, K027, K030, and K033)

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHDAPCD) in writing of any daily record showing the use of more than ten gallons of lubricant, rust inhibitor, and repair coat combined. The notification shall include a copy of such record and shall be sent to the CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall notify the CCHDAPCD in writing of any exceedance of the rolling, 365 day coating

usage limitations denoted in Additional Special Term and Condition III.A.2. The notification shall include a copy of such record and shall be sent to the CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

D. Compliance Methods and Emission Testing Requirements (K016, K019, K021, K024, K027, K030, and K033)

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

a. Coating Usage Limitation

Use of less than 10 gallons per day of lubricant, rust inhibitor, and repair coat combined.

Applicable Compliance Method

Recordkeeping and reporting per Additional Special Terms and Conditions III.B. and III.C. above.

b. Emission Limitation

tons VOC/rolling, 365 day summation period

Emissions Unit	VOCs (tpy)
K016	1.63
K019	2.26
K021	4.67
K024	2.20
K027	2.30
K030	2.20
K033	2.26

Applicable Compliance Method

Maintain records of the rolling, 365 day summation of the gallons of each coating

(including lubricant, rust inhibitor, and repair coat) used. Calculate the VOC emissions using the corresponding VOC contents (in lbs/gal) of the coating employed and divide by 2000 lbs/ton. Recordkeeping and reporting per Additional Special Terms and Conditions III.B and III.C above.

E. Miscellaneous Requirements (K016, K019, K021, K024, K027, K030, and K033)

1. The following Additional Special Terms and Conditions shall supersede all of the air pollution control requirements contained in the permit to install (application number 15-640) issued for these emissions units on April 10, 1991: III.A, III.B, III.C, and III.D.

IV. Emissions Units K018, K023, K026, K029, K032 (The following conditions apply per emissions unit unless otherwise specified below)

A. Operational Restrictions (K018, K023, K026, K029, K032)

1. Only coatings which comply with the allowable emission limit established in accordance with BAT - 2.97 lbs VOC/gal of coating, excluding water and exempt solvents - shall be used in this emissions unit.

2. The maximum annual amount (in gallons/year) of coating used shall not exceed the following, based upon a rolling 365-day summation of the amount of coating used each day:

Emissions Unit	coating (gal/yr)
K018	12,432
K023	8,285
K026	15,698
K029	8,285
K032	12,432

3. For emissions units K018, K023, K026, K029, and K032, existing coating usage data is available to demonstrate compliance with limits in Additional Special Term and Condition IV.A.2.

B. Monitoring and/or Recordkeeping Requirements (K018, K023, K026, K029, K032)

1. 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, as applied;

   b. the VOC content, in pounds of VOC per gallon, of each coating (excluding water and exempt solvents), as applied;

   c. the VOC content, in pounds of VOC per gallon, of each coating, as applied;

   d. the individual HAP content for each HAP of each coating employed, in pounds of individual HAP per gallon of coating, as applied;

   e. the number of gallons of each coating employed per day;

   f. the rolling, 365-day summation of the amount of coatings employed, in gallons per year;

   g. the total VOC emissions from all coatings employed, in pounds or tons per day;

   h. the rolling, 365-day summation of the VOC emissions from the coatings employed, in tons per year;

   i. the total HAP emissions, both single and combined, from each coating employed, in pounds/day; and,

   j. the rolling, 365-day summation of HAP emissions, both single and combined, in tons/year.

If the permittee mixes complying coatings at the line, it is not necessary to record the VOC content of the resulting mixture.

C. **Reporting Requirements**
(K018, K023, K026, K029, K032)

1. The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHDAPCD) 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 CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall notify the CCHDAPCD in writing of any exceedance of the rolling, 365 day coating usage limitations denoted in Condition A.2. The notification shall include a copy of such record and shall be sent to the CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

D. **Compliance Methods and Emission Testing Requirements**
(K018, K023, K026, K029, and K032)

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

   a. Emission Limitation

      2.97 lbs VOC/gallon of coating, excluding water and exempt solvents

      Applicable Compliance Method

      Method 24 of 40 CFR Part 60, Appendix A.

b. Emission Limitation

tons VOC/rolling, 365 day summation period

Emissions Unit	VOCs (tpy)
K018	1.06
K023	0.70
K026	1.33
K029	0.70
K032	1.06

Applicable Compliance Method

Maintain records of the rolling, 365 day summation of the gallons of coating employed. Calculate the VOC emissions using the corresponding VOC contents (in lbs/gal) of the coatings employed and divide by 2000 lbs/ton. Recordkeeping and reporting per Additional Special Terms and Conditions IV.B and IV.C above.

E. Miscellaneous Requirements (K018, K023, K026, K029, K032)

1. The following Additional Special Terms and Conditions shall supersede all of the air pollution control requirements contained in the permit to install (application number 15-640) issued for these emissions units on April 10, 1991: IV.A, IV.B, IV.C, and IV.D.

V. General Facility Wide Conditions

A. Operational Restrictions

1. The combined annual emissions from the entire facility, except K040 and K041 shall not exceed 90.19 tpy VOC based on a rolling, 365-day summation of emissions.

2. The combined annual emissions from the entire facility shall not exceed 9.0 tpy of any single HAP based on a rolling, 365-day summation of emissions.

3. The combined annual emissions from the entire facility shall not exceed 24.0 tpy of total combined HAPs based on a rolling, 365-day summation of emissions.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records in accordance with Additional Special Terms and Conditions I.B.1., II.B.1., III.B.1., and IV.B.1. of this permit.

2. The permittee shall collect and record the following information each day for all emissions units:

   a. the total VOC emissions from all of the emissions units at this facility, except K040 and K041, as determined per Additional Special Terms and Conditions I.B.1, II.B.1, III.B.1, and IV.B.1 of this permit, in pounds or tons per day;

   b. the total rolling, 365-day summation of the VOC emissions from all of the emissions units at this facility, except K040 and K041, as determined per Additional Special Terms and Conditions I.B.1, II.B.1, III.B.1, and IV.B.1 of this permit, in tons per year;

   c. the total individual HAP emissions from all of the emissions units at this facility as determined per Additional Special Terms and Conditions I.B.1, II.B.1, III.B.1, and IV.B.1 of this permit, in pounds or tons per day;

   d. the total rolling, 365-day summation of the individual HAP emissions from all of the emissions units at this facility as determined per Additional Special Terms and Conditions I.B.1, II.B.1, III.B.1, and IV.B.1 of this permit, in tons per year;

   e. the total combined HAP emissions from all of the emissions units at this facility as determined per Additional Special Terms and Conditions I.B.1, II.B.1, III.B.1, and IV.B.1 of this permit, in pounds or tons per day; and,

f. the total rolling, 365-day summation of the combined HAP emissions from all of the emissions units at this facility as determined per Additional Special Terms and Conditions I.B.1, II.B.1, III.B.1, and IV.B.1 of this permit, in tons per year.

C. Reporting Requirements

1. The permittee shall notify the CCHDAPCD in writing of any exceedance of the rolling, 365 day emission limitations denoted in Additional Special Terms and Conditions V.A.1, V.A.2, and V.A.3. The notification shall include a copy of such record and shall be sent to the CCHDAPCD within 30 days following the end of the calendar month in which the exceedance occurred.

D. Testing Requirements

1. Compliance with the facility-wide emission limitation shall be determined in accordance with the following methods:

a. Emission Limitation

90.19 TPY VOC based upon a rolling, 365-day summation of emissions

Applicable Compliance Method

Maintain records and submit reports in accordance with Additional Special Terms and Conditions V.B and V.C.

b. Emission Limitation

9.0 tpy of any single HAP based upon a rolling, 365-day summation of emissions

Applicable Compliance Method

Maintain records and submit reports in accordance with Additional Special Terms and Conditions V.B and V.C.

c. Emission Limitation

24.0 tpy of total combined HAPs based upon a rolling, 365-day summation of emissions

Applicable Compliance Method

Maintain records and submit reports in accordance with Additional Special Terms Conditions V.B and V.C.

E. Miscellaneous Requirements

1. This permit allows the use of material specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (ug/m^3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.87

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 140

MAGLC (ug/m^3): 4, 190

Pollutant: hexane isomers

TLV (ug/m^3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.73

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 278

MAGLC (ug/m^3): 41,905

Pollutant: ethanol

TLV (ug/m^3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 208

MAGLC (ug/m^3): 44,762

Pollutant: heptane

TLV (ug/m^3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 15.65

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 2,518

MAGLC (ug/m^3): 39,048

Pollutant: isopropanol

TLV (ug/m^3): 983

Maximum Hourly Emission Rate (lbs/hr): 4.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 685

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. 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 value specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used or use of new materials that would result in the emission of an air contaminant not previously permitted; and,

d. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned changes as a "modification" requiring a permit to install if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Facility Name: **Phoenix Packaging Company - Warner**
Application Number: **15-1328**
Date: **August 11, 1999**