OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

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

RE: PERMIT TO INSTALL DIRECT FINAL
STARK COUNTY
Application No: 15-1369

CERTIFIED MAIL

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

DATE: May 19, 1999

RECEIVED
MAY 26 1999
CANTON CITY HEALTH DEPT
AIR POLLUTION DIVISION

Phoenix Packaging Co - Warner
David E Blizzard
PO Box 2290
North Canton, OH 44720

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

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

You are hereby notified that this action 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

Very truly yours,

Thomas G. Rigo

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

cc: USEPA
CANTON CITY HEALTH DEPARTMENT

DIRECT FINAL PERMIT TO INSTALL 15-1369

Application Number: 15-1369

APS Premise Number: 1576051610

Permit Fee: **$200**

Name of Facility: Phoenix Packaging Co - Warner

Person to Contact: David E Blizzard
Address: PO Box 2290
North Canton, OH 44720

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

Description of proposed emissions unit(s):
NEW POST-REPAIR COATING STATION.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	3.42

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Line 601, air-gun spray application of repair coat to the inside score line of 2- and 3-piece can ends	OAC rule 3745-21-09(U)(2)(e)(ii)	Use of less than 10 gallons per day of repair coat
	OAC rule 3745-31-05	Repair Coating: Limit of 5.15 pounds VOC/gallon of coating, excluding water and exempt solvents Cleanup Solvent: Limit of 6.67 pounds VOC/gallon Compliance with the Ohio EPA Air Toxics Policy
	Synthetic Minor Limits to Avoid Title V (See Section B.)	Limit per rolling 365 day period: 1,095 gallons of repair coating; 180 gallons of cleanup solvent and 3.42 tons VOC The combined annual emissions from the entire facility shall not exceed 9.0 tons/year of any single HAP based upon a rolling, 365-day summation of emissions. The combined annual emissions from the entire facility shall not exceed 24.0 tons/year of total combined HAPs based upon a rolling, 365-day summation of emissions.

2. Additional Terms and Conditions

2.a None.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 1,095 gallons, based upon a rolling, 365-day summation of the coating usage figures.

   To ensure enforceability during the first 12 calendar months of operation after the startup of this emissions unit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	91
1-2	183
1-3	274
1-4	365
1-5	456
1-6	548
1-7	639
1-8	730
1-9	821
1-10	913
1-11	1004
1-12	1095

   After the first 12 calendar months of operation after startup of the emissions unit, compliance with the annual coating usage limitation shall be based upon a rolling, 365-day summation of the coating usage figures.

2. The maximum annual cleanup material usage for this emissions unit shall not exceed 180 gallons, based upon a rolling, 365-day summation of the cleanup material usage figures. Other materials may used if approved by the Canton City Health Department, Air Pollution Control Division prior to initial use.

   To ensure enforceability during the first 12 calendar months of operation after the startup of this emissions unit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	15
1-2	30
1-3	45
1-4	60
1-5	75
1-6	90
1-7	105
1-8	120
1-9	135
1-10	150
1-11	165
1-12	180

After the first 12 calendar months of operation after startup of the emissions unit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 365-day summation of the cleanup material usage figures.

3. This post-repair coating station will generally operate as part of Line 601 but it may be operated off-line in order to serve other production lines at this facility.

C. Monitoring and/or Recordkeeping Requirements

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.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

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 submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day limitation and, for the first 12 calendar months of operation after the startup of this emissions unit, all exceedances of the maximum cumulative coating usage levels. The reports 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. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day limitation and, for the first 12 calendar months of operation after the startup of this emissions unit, all exceedances of the maximum cumulative cleanup material usage levels. 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.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for individual HAP and total combined HAPs. The report 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.

E. Testing Requirements

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

   a. Emission Limitation

   5.15 lbs VOC/gallon of coating, excluding water and exempt solvents for repair coating and 6.67 lbs VOC/gallon for cleanup solvent

   Applicable Compliance Method

   Formulation data or Method 24 of 40 CFR Part 60, Appendix A.

   b. Emission Limitation

   3.42 tons VOC/rolling, 365-day period

   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. and divide by 2000 lbs/ton. Recordkeeping and reporting per Conditions III and IV above.

   c. 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. Recordkeeping and reporting per Conditions III and IV above. Calculate the HAP emissions using the HAP content (in lbs/gal) of each coating and cleanup material employed.

   d. 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. Recordkeeping and reporting per Conditions III and IV above. Calculate the HAP emissions using the HAP content (in lbs/gal) of each coating and cleanup material employed.

F. 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: MIBK

   TLV (ug/m3): 208,500

   Maximum Hourly Emission Rate (lbs/hr): 3.45

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,673

   MAGLC (ug/m3): 4,964

   OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior 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 <u>may</u> 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.

2. This permit to install will be issued as a Direct Final PTI. In order to ensure federal enforceability of the terms and conditions, the permit to operate for this emissions unit shall be issued as a Draft/Final Permit to Operate.

Phoenix Packaging Company - Warner Plant
PTI 15-1369
SYNTHETIC MINOR DETERMINATION

A. Source Description: This PTI is for a new emissions unit, K040, to be installed at an existing facility. All of the other emissions units at this facility, K015-K039, presently have federally enforceable terms and conditions, found in PTI 15-1328, which limit the potential to emit of VOC to a total of no more than 97.5 TPY, based upon a rolling, 365-day summation of the daily VOC emissions . Each individual emissions unit has its own allowable annual VOC limit. PTI 15-1328 will be administratively modified which will result in a total VOC allowable of 93.29 TPY based upon a rolling, 365-day summation of the daily VOC emissions.

B. Facility Emissions/Attainment Status: This facility is to be located in Stark County which is attainment for all pollutants.

C. New Source Emissions: This new emissions unit is accepting a federally enforceable limit of 3.42 TPY VOC as a rolling, 365-day, summation.

D. Conclusion: Adding the two allowables as follows:

PTI	Allowable (TPY)
15-1328(Mod.)	93.29
15-1369	3.42
Total	96.71

Since 96.71 TPY is less than 100 TPY this facility will continue to avoid Title V.

g:\shared\apc\ohioepa\pti\draft\151369sm.wpd