Ohio EPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED
SEP 27 1994
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

George V. Voinovich
Governor

Re: Permit to Install
Stark County
Application No: 15-1111
SYNTHETIC MINOR

CERTIFIED MAIL

September 14, 1994

NORTECH, INC
DAVID J BOWERS
P O BOX 20310
CANTON, OH 44701

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: US EPA
CANTON AIR POLLUTION CONTROL

Printed on recycled paper

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 15-1111
APS Premise No. 1576051610
Permit Fee: $1800.00

Name of Facility: NORTECH, INC

Person to Contact: DAVID J BOWERS

Address: P O BOX 20310
CANTON, OH 44701

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

Description of proposed source(s):
MODIFICATION OF EIGHT CAN END SEALING COMPOUND COATING LINES & INSTALLATION OF A CAN END SEALING COMPOUND COATING LINE.

Date of Issuance: September 14, 1994

Effective Date: September 14, 1994

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

Donald R Schregardus

Director

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(S)

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 prove to be inadequate or 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 15 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.

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 made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for NORTECH, INC located in Stark County. The sources 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
K001	Two piece food can end sealing compound coating line; Nortech line #401N	See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	4.96 lbs VOC/hr 10.85 tons VOC/yr
K005	Two piece food can end sealing compound coating line; Nortech line #602N	See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	0.76 lb VOC/hr 2.87 tons VOC/yr
K006	Two piece food can end sealing compound coating line; Nortech line #603N	See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	5.62 lbs VOC/hr 22.05 tons VOC/yr
K007	Two piece food can end sealing compound coating line; Nortech line #604N	See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	5.62 lbs VOC/hr 22.05 tons VOC/yr
K008	Two piece food can end sealing compound coating line; Nortech line #605N	See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	0.94 lb VOC/hr 3.66 tons VOC/yr

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K009	Two piece food can end sealing compound coating line; Nortech line #606N	See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	5.62 lbs VOC/hr 22.05 tons VOC/yr
K010	Two piece food can end sealing compound coating line; Nortech line #607N	Compliance Coating; Usage Limits See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	0.76 lb VOC/hr 2.87 tons VOC/yr
K011	Two piece food can end sealing compound coating line; Nortech line #608N	Compliance Coating; Usage Limits See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	0.94 lb VOC/hr 3.66 tons VOC/yr
K013	Two piece food can end sealing compound coating line; Nortech line #600N	Compliance Coating; Usage Limits See Additional Terms and Conditions	3745-31-05 3745-21-09 (D)(1)(e)	1.34 lbs VOC/hr 5.26 tons VOC/yr

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
VOC	*96.77

*This figure includes OC emissions from the end sealing compound, repair coating, mist solution and all clean-up solvents.

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. N. , City Hall, Canton, Ohio 44702-1544.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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.

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

1. Usage Limits

These sources K001, K005, K006, K007, K008, K009, K010, K011, and K013 shall be limited to the following usage combined rates per rolling 365-day period.

A.	Solvent based end sealing compound	32,920 gal.
B.	Mist solution	3,139 gal.
C.	Repair coat water base	42,458 gal.
D.	Repair coat solvent base	1,770 gal.
E.	Isopropyl alcohol	527 gal.

This facility shall maintain records indicating the daily amount of each of these materials employed, the calculated rolling 365 day total amount of each of these materials used. In order to ensure federal enforceability, for the first twelve calendar months after this Permit to Install is issued, Nortech shall not exceed the following usage limits:

Month	Total Usage	
1-3	8,320 gal.	solvent based end sealing compound
	785 gal.	mist solution
	10,615 gal.	repair coat water base
	443 gal.	repair coat solvent base
	132 gal.	isopropyl alcohol
1-4	10,973 gal.	solvent based end sealing compound
	1,046 gal.	mist solution
	14,153 gal.	repair coat water base
	590 gal.	repair coat solvent base
	176 gal.	isopropyl alcohol
1-5	13,717 gal.	solvent based end sealing compound
	1,308 gal.	mist solution
	17,691 gal.	repair coat water base
	738 gal.	repair coat solvent base
	220 gal.	isopropyl alcohol
1-6	16,460 gal.	solvent based end sealing compound
	1,570 gal.	mist solution
	21,229 gal.	repair coat water base
	885 gal.	repair coat solvent base
	264 gal.	isopropyl alcohol
1-7	19,203 gal.	solvent based end sealing compound
	1,831 gal.	mist solution
	24,767 gal.	repair coat water base
	1.033 gal.	repair coat solvent base
	308 gal.	isopropyl alcohol
1-8	21,947 gal.	solvent based end sealing compound
	2,093 gal.	mist solution
	28,305 gal.	repair coat water base
	1,180 gal.	repair coat solvent base
	352 gal.	isopropyl alcohol
1-9	24,690 gal.	solvent based end sealing compound
	2,354 gal.	mist solution
	31,844 gal.	repair coat water base
	1,328 gal.	repair coat solvent base
	396 gal.	isopropyl alcohol
1-10	27,433 gal.	solvent based end sealing compound
	2,616 gal.	mist solution
	35,382 gal.	repair coat water base
	1,475 gal.	repair coat solvent base
	440 gal.	isopropyl alcohol
1-11	30,177 gal.	solvent based end sealing compound
	2,877 gal.	mist solution
	38,920 gal.	repair coat water base
	1,623 gal.	repair coat solvent base
	484 gal.	isopropyl alcohol

1-12	32,920 gal.	solvent based end sealing compound
	3,139 gal.	mist solution
	42,458 gal.	repair coat water base
	1,770 gal.	repair coat solvent base
	527 gal.	isopropyl alcohol

After the first twelve months after this PTI is issued, Nortech shall conform with the limitations and reporting requirements of this condition. Quarterly reports summarizing this data and an indication of any exceedances of the usage limitations shall be submitted to the Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702.

The combined usage of isopropyl alcohol as a cleaning solution from all of these sources shall not exceed 527 gal/year.

The organic compound content of the solvent based end sealing compound shall not exceed 3.7 lbs/gal H_2O as employed.

A mist solution is used to prevent clogging of the nozzle that applies gasket material.

The organic compound content of the mist solution shall not exceed 5.5 lbs/gal H_2O as employed.

The purpose of the repair coating is to prevent the food product from chemically reacting with the metal end. The end is made of pre-coated metal. This coating is applied at another facility. The repair coating coats bare metal exposed because of the installation of the easy opening tab and is strictly a touch-up operation.

The organic compound content of the water based repair coat shall not exceed 2.95 lbs/gal H_2O as employed.

The organic compound content of the solvent based repair coat shall not exceed 5.95 lbs/gal H_2O as employed.

The organic compound content of the water based end sealing compound shall not exceed 0 lb/gal H_2O as employed.

Before these sources use any type of material not listed in the above chart or exceeds any of these limits, this facility must contact the Canton City Health Department, Division of Air Pollution Control to determine whether Permits to Modify are needed.

2. This facility shall maintain daily records which list the organic compound content and the amount of end sealing compound isopropyl alcohol cleaning solution, mist solution and repair coat employed in each source. These daily records shall be retained in the company's files for a period of not less than two (2) years and shall be made available to the

Director, or any authorized representative of the Director, for review during normal business hours.

This facility shall submit semi-annual reports which show the organic compound content and the amount of end sealing compound, isopropyl alcohol cleaning solution, mist solution and repair coat employed during the previous six (6) calendar months. These semi-annual reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

3. Source K002, K003 and K012 are permanently shut down.

4. Source K004 shall have zero VOC emissions.

5. This facility shall only employ non-photochemically reactive solvents for equipment clean-up (as defined in OAC 3745-21-07).

6. This Permit to Install replaces Permit to Install 15-640 issued April 10, 1991 and the modification of the PTI issued July 15, 1992.

7. These sources will only coat ends for food cans. No beverage can ends will be coated. Beverage can means any two-piece steel or aluminum container in which soft drinks or beer, including malt liquor, are packaged. The definition does not include containers in which fruit or vegetable juices are packaged.