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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K015 (Line 208, blanked end liner) Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K015 (Line 208, blanked end liner)
Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner 208: spray application of an end seal compound to the inner lip of unfinished 2- and 3-piece can ends	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit including cleanup material shall not exceed 0.28 lb/hr and 0.8 ton/year.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.1 through B.4 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAPs); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The limitation for VOC emissions from this emissions unit of 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

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

b. the maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month; and

c. the VOC content of the cleanup material used shall not exceed 6.6 lbs/gal. Other materials may be used if approved by the Canton local air agency prior to initial use.

B. Operational Restrictions (continued)

2. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	20
1-2	41
1-3	61
1-4	81
1-5	102
1-6	122
1-7	142
1-8	163
1-9	183
1-10	203
1-11	224
1-12	244

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

3. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent- based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating and cleanup material employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

   b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the name and identification number of each cleanup material employed;

   g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

   h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

   i. the number of gallons of each cleanup material employed;

   j. the total individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all coatings plus the sum of (g) times (i) for all of the cleanup materials);

   k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

C. Monitoring and/or Record Keeping Requirements (continued)

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all cleanup materials);

m. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

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

p. the rolling, 12-month summation of the total gallons of cleanup material employed (the sum of (i) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

C. Monitoring and/or Record Keeping Requirements (continued)

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 244 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

1.a Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

E. Testing Requirements (continued)

1.b Emissions Limitation

6.6 lbs VOC/gallon of cleanup

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

1.c Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 0.28 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

1.d Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 0.80 ton/yr based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

1.e Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

1.f Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

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

2.a Usage Restrictions

The maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

F. Miscellaneous Requirements

None

OhioEPA

State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

CERTIFIED MAIL

11/10/03 **RE: Final Chapter 3745-35 Permit To Operate**

K016 (Line 208, conversion press)

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K016 (Line 208, conversion press)

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
conversion press Line 208: wipe application of lubricant and rust inhibitor to unconverted can ends for tab attachment in conversion press	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.04 lbs/hr and 3.04 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V)	The VOC emissions from this emissions unit shall not exceed 3.04 tons per year based upon a rolling, 12-month summation of the monthly emissions. See section A.2.a and sections B.1 through B.5 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAPs); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily combined usage rate of tab lubricant and rust inhibitor for this emissions unit shall not exceed 10 gallons.

2. The limitation for volatile organic compound emissions from this emissions unit of 3.04 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;

b. the maximum annual amount of rust inhibitor used shall not exceed 445 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used each month;

c. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

d. the VOC content of the rust inhibitor used shall not exceed 6.3 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	49
1-2	98
1-3	147
1-5	245
1-6	294
1-7	343
1-8	392
1-9	441
1-10	490
1-11	539
1-12	588

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

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the rust inhibitor usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Rust Inhibitor Usage (gallons)
1	37
1-2	74
1-3	110
1-4	148
1-5	185
1-6	222
1-7	259
1-8	296
1-9	334
1-10	371
1-11	408
1-12	445

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

5. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant and rust inhibitor employed;

b. the number of gallons of each tab lubricant and rust inhibitor employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant and rust inhibitor employed, as applied;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all tab lubricants and rust inhibitors, in pounds per hour (average).

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each tab lubricant and rust inhibitor employed:

a. the name and identification number of each tab lubricant and rust inhibitor employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant and rust inhibitor employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each tab lubricant employed, as applied;

g. the total combined HAP content of each rust inhibitor, in pounds of combined HAPs per gallon of rust inhibitor, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of rust inhibitor employed;

i. the total individual HAP usage from all tab lubricants and rust inhibitors employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all tab lubricants plus the sum of (f) times (h) for all of the rust inhibitors);

j. the total combined HAP usage from all tab lubricants and rust inhibitors employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants plus the sum of (g) times (h) for all of the rust inhibitors);

k. the total VOC emissions from all tab lubricants and rust inhibitors employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants plus the sum of (b) times (h) for all rust inhibitors);

l. the rolling, 12-month summation of individual HAP usage from all tab lubricants and rust inhibitors employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);

m. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants and rust inhibitors employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of the total VOC emissions from all tab lubricants and rust inhibitors employed, in tons per year (the sum of (k) for the previous 12 calendar months);

o. the rolling, 12-month summation of the gallons of tab lubricant employed (the sum of (e) for the previous 12 calendar months); and

p. the rolling, 12-month summation of the gallons of rust inhibitor employed (the sum of (h) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage and the cumulative rust inhibitor usage for each calendar month.

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants and rust inhibitors. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall notify the Canton local air agency in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 588 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant levels;

   c. the rolling, 12-month usage limitation of 445 gallons of rust inhibitors and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative rust inhibitor usage levels; and

   d. the rolling, 12-month facility emission limitations for individual HAPs, combined HAPs and VOCs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs, combined HAPs, and VOCs.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

1.a Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 1.04 lbs/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

1.b Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

1.c Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

1.d Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 3.04 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

E. Testing Requirements (continued)

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

2.a Operational Limitation

The maximum daily combined usage rate of tab lubricants and rust inhibitors for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.b.

c. Operational Limitation
The maximum annual amount of rust inhibitor used shall not exceed 445 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

2.b Usage Restrictions

The maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

2.c Operational Limitation
The maximum annual amount of rust inhibitor used shall not exceed 445 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K017 (Line 202, blanked end liner) Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K017 (Line 202, blanked end liner)

Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner 202: spray application of an end seal compound to the inner lip of unfinished 2- and 3-piece can ends	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit including cleanup material shall not exceed 0.28 lb/hr and 0.8 ton/year.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.1 through B.4 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAPs); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The limitation for VOC emissions from this emissions unit of 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

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

   b. the maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month; and

   c. the VOC content of the cleanup material used shall not exceed 6.6 lbs/gal. Other materials may be used if approved by the Canton local air agency prior to initial use.

2. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	20
1-2	41
1-3	61
1-4	81
1-5	102
1-6	122
1-7	142
1-8	163
1-9	183
1-10	203
1-11	224
1-12	244

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

3. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

   *The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

b. the number of gallons of each coating and cleanup material employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed, as applied;

f. the name and identification number of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all cleanup materials);

m. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

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

p. the rolling, 12-month summation of the total gallons of cleanup material employed (the sum of (i) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage for each calendar month.

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. the average hourly mass emission limitation for VOC;

b. the rolling, 12-month usage limitation of 244 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and

c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

1.a Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

1.b Emissions Limitation

6.6 lbs VOC/gallon of cleanup

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

1.c Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 0.28 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

1.d Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 0.80 ton/yr based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

E. Testing Requirements (continued)

1.e Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

1.f Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

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

2.a Usage Restrictions

The maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K018 (Line 202, e-coat repair coat) Electrolytic dip applicaiton of repair coat material to converted can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K018 (Line 202, e-coat repair coat)
Electrolytic dip applicaiton of repair coat material to converted can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
electrolytic dip application of repair coat material to converted can ends; Line 202	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.36 lb/hr and 1.06 tons/year. See section B.1 below.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.5 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 0.17 pound of VOC per gallon of coating, excluding water and exempt solvents.

B. Operational Restrictions (continued)

2. The limitation for volatile organic compound emissions from this emissions unit of 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved limiting the maximum annual amount of coating used to 12,432 gallons, based upon a rolling, 12-month summation of the amount of coating used each month.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	1,036
1-2	2,072
1-3	3,108
1-4	4,144
1-5	5,180
1-6	6,216
1-7	7,252
1-8	8,288
1-9	9,324
1-10	10,360
1-11	11,396
1-12	12,432

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

4. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating employed:

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

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

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the total individual HAP usage from all coatings employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings);

   g. the total combined HAP usage from all coatings employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings);

   h. the total VOC emissions from all coatings employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings);

   i. the rolling, 12-month summation of individual HAP usage from all coatings employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

   j. the rolling, 12-month summation of the total combined HAP usage from all coatings employed, in pounds or tons per year (the sum of (g) for the previous 12 calendar months);

   k. the rolling, 12-month summation of the total VOC emissions from all coatings employed, in pounds or tons per year (the sum of (h) for the previous 12 calendar months); and

   l. the rolling, 12-month summation of the total gallons of coating employed (the sum of (e) for the previous 12 calendar months).

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

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

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 12,432 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 15,698 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.36 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

c. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

d. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

e. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

E. Testing Requirements (continued)

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

a. Usage Restrictions

The maximum annual amount of coating used shall not exceed 12,432 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.I.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K019 (Line 202, conversion press) Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K019 (Line 202, conversion press)
Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wipe application of tab lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press; Line 202	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.78 lb/hr and 2.27 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.7 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for VOC emissions from this emissions unit of 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

   a. the maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;

   b. the maximum annual amount of rust inhibitor used shall not exceed 319 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used each month;

   c. the maximum annual amount of repair coat used shall not exceed 1,277 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

   d. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use);

   e. the VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

   f. the VOC content of the repair coat used shall not exceed 0.09 lb/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	49
1-2	98
1-3	147
1-4	196
1-5	245
1-6	294
1-7	343
1-8	392
1-9	441
1-10	490
1-11	539
1-12	588

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the rust inhibitor usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Rust Inhibitor Usage (gallons)
1	27
1-2	53
1-3	80
1-4	106
1-5	133
1-6	159
1-7	186
1-8	213
1-9	239
1-10	266
1-11	292
1-12	319

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

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	106
1-2	213
1-3	319
1-4	426
1-5	532
1-6	638
1-7	745
1-8	851
1-9	958
1-10	1,064
1-11	1,170
1-12	1,277

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

6. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emission unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant, rust inhibitor, and repair coat employed;

b. the number of gallons of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all tab lubricants, rust inhibitors, and repair coats, in pounds per hour (average); and

f. the total volume, in gallons, of all the tab lubricants, rust inhibitors, and repair coats employed.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each tab lubricant, rust inhibitor, and repair coat material employed:

a. the name and identification number of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each tab lubricant employed, as applied;

f. the individual HAP content for each HAP of each rust inhibitor, in pounds of individual HAP per gallon of rust inhibitor, as applied;

g. the total combined HAP content of each rust inhibitor, in pounds of combined HAPs per gallon of rust inhibitor, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of rust inhibitor employed;

i. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

j. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (i));

k. the number of gallons of repair coat employed;

l. the total individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all tab lubricants plus the sum of (f) times (h) for all of the rust inhibitors plus the sum of (i) times (k) for all of the repair coatings);

m. the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants plus the sum of (g) times (h) for all of the rust inhibitors plus the sum of (j) times (k) for all repair coatings);

n. the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants plus the sum of (b) times (h) for all rust inhibitors plus the sum of (b) times (k) for all repair coatings);

o. the rolling, 12-month summation of individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (m) for the previous 12 calendar months);

q. the rolling, 12-month summation of the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (n) for the previous 12 calendar months);

r. the rolling, 12-month summation of the gallons of tab lubricant employed (the sum of (e) for the previous 12 calendar months);

s. the rolling, 12-month summation of the gallons of rust inhibitor employed (the sum of (h) for the previous 12 calendar months); and

C. Monitoring and/or Record Keeping Requirements (continued)

t. the rolling, 12-month summation of the gallons of repair coat employed (the sum of (k) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage, the cumulative rust inhibitor usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 588 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant usage levels;

   c. the rolling, 12-month usage limitation of 319 gallons of rust inhibitors and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative rust inhibitor usage levels;

   d. the rolling, 12-month usage limitation of 1,277 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   e. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes tab lubricants, rust inhibitors, and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily combined usage limit for tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation:

The VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation:

The VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation:

The VOC content of the repair coat used shall not exceed 0.09 lb/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

d. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 0.78 lb/hr.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

E. Testing Requirements (continued)

e. Emissions Limitation:

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

f. Emissions Limitation:

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

g. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

E. Testing Requirements (continued)

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

a. Usage Restriction:

The maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.r.

b. Usage Restriction:

The maximum annual amount of rust inhibitor used shall not exceed 319 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.s.

c. Usage Restriction:

The maximum annual amount of repair coat used shall not exceed 1,277 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.t.

d. Usage Restriction:

The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K020 (Line 203, blanked end liner) Spray applicaiton of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 1 0 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K020 (Line 203, blanked end liner)
Spray applicaiton of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner 203: spray application of an end seal compound to the inner lip of unfinished 2- and 3-piece can ends	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 6.39 lbs/hr and 22.38 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	VOC emissions from this emissions unit shall not exceed 22.38 tons per year based upon a rolling, 12-month summation of the monthly emissions See sections A.2.a and B.2 through B.5 below.
	OAC rule 3745-21-09(D)(2)(e)	See section B.1 below.

2. Additional Terms and Conditions

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. The limitation for volatile organic compound emissions from this emissions unit of 22.38 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved limiting the maximum annual amount of coating used to 12,096 gallons, based upon a rolling, 12-month summation of the amount of coating used each month.

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	1,008
1-2	2,016
1-3	3,024
1-4	4,032
1-5	5,040
1-6	6,048
1-7	7,056
1-8	8,064
1-9	9,072
1-10	10,080
1-11	11,088
1-12	12,096

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

4. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emission unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

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

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the total individual HAP usage from all coatings employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings);

   g. the total combined HAP usage from all coatings employed, in pounds or tons per month (the sum of (d) times (e) for all coatings);

   h. the total VOC emissions from all coatings employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings);

   i. the rolling, 12-month summation of individual HAP usage from all coatings employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

   j. the rolling, 12-month summation of the total combined HAP usage from all coatings employed, in pounds or tons per year (the sum of (g) for the previous 12 calendar month);

   k. the rolling, 12-month summation of the total VOC emissions from all coatings employed, in pounds or tons per year (the sum of (h) for the previous 12 calendar months); and

   l. the rolling, 12-month summation of the gallons of coating employed (the sum of (e) for the previous 12 calendar months).

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

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

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 12,096 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

VOC emissions from this emissions unit shall not exceed 6.39 lbs/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

c. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

d. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

e. Emissions Limitation

VOC emissions from this emissions unit shall not exceed 22.38 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

E. Testing Requirements (continued)

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

   a. Usage Restriction

   The maximum annual amount of coating used shall not exceed 12,096 gallons, based upon a rolling, 12-month summation of the amount of coating used.

   Applicable Compliance Method

   Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.I.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K021 (Line 203, conversion press) Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

RECEIVED
NOV 1 9 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K021 (Line 203, conversion press)
Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wipe application of tab lubricant to unconverted can ends for tab attachment in conversion press; Line 203.	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.93 lb/hr and 3.27 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 3.27 tons per year based upon a rolling, 12-month summation of the monthly emissions. See section A.2.a and sections B.2 through B.6 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAPs); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

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

2. The limitation for volatile organic compound emissions from this emissions unit of 3.27 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of tab lubricant used shall not exceed 1,176 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month; and

b. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	98
1-2	196
1-3	294
1-4	392
1-5	490
1-6	588
1-7	686
1-8	784
1-9	882
1-10	980
1-11	1,078
1-12	1,176

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

4. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent- based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant employed;

   b. the number of gallons of each tab lubricant employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant employed, as applied;

   d. the total number of hours the emissions unit was in operation;

   e. the average hourly VOC emission rates for all tab lubricants in pounds per hour (average); and

   f. the total volume, in gallons, of all the tab lubricants employed.

2. The permittee shall collect and record the following information for each month for each tab lubricant and employed:

   a. the name and identification number of each tab lubricant employed, as applied;

   b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant employed, as applied;

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

   d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each tab lubricant employed, as applied;

   f. the total individual HAP usage from all tab lubricants employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the tab lubricants);

   g. the total combined HAP usage from all tab lubricants employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants);

   h. the total VOC emissions from all tab lubricants employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants);

   i. the rolling, 12-month summation of individual HAP usage from all tab lubricants employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

   j. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants employed, in pounds or tons per year (the sum of (g) for the previous 12 calendar months);

   k. the rolling, 12-month summation of the total VOC emissions from all tab lubricants employed, in pounds or tons per year (the sum of (h) for the previous 12 calendar months); and

   l. the rolling, 12-month summation of the total gallons of the tab lubricant employed (the sum of (e) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage usage for each calendar month.

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 1,176 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes tab lubricants), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily combined usage limit for tab lubricants and rust inhibitors. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation

The VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.93 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

c. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

d. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

e. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 3.27 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

E. Testing Requirements (continued)

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

a. Operational Limitation

The maximum annual amount of tab lubricant used shall not exceed 1,176 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.l.

b. Operational Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: **Final Chapter 3745-35 Permit To Operate**

K022 (Line 204, blanked end liner) Spray applicaiton of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K022 (Line 204, blanked end liner)
Spray applicaiton of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner 204: Spray application of an end seal compound to the inner lip of unfinished 2- and 3-piece can ends	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 4.96 lbs/hr and 14.46 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	Volatile organic compound emissions from this emissions unit shall not exceed 14.46 tons per year based upon a rolling, 12-month summation of the monthly emissions See A.2.a and B.2 through B.6 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. The limitation for volatile organic compound emissions from this emissions unit of 14.46 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of coating used shall not exceed 6,531 gallons, based upon a rolling, 12-month summation of the amount of coating used each month;

b. the maximum annual amount of cleanup material used shall not exceed 851 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month; and

c. the VOC content of the cleanup material used shall not exceed 5.6 lbs/gal. Other materials may be used if approved by the Canton local air agency prior to initial use.

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	71
1-2	142
1-3	213
1-4	284
1-5	355
1-6	426
1-7	497
1-8	568
1-9	639
1-10	709
1-11	781
1-12	851

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

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	544
1-2	1,089
1-3	1,633
1-4	2,177
1-5	2,721
1-6	3,266
1-7	3,810
1-8	4,354
1-9	4,898
1-10	5,443
1-11	5,987
1-12	6,531

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

5. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

b. the number of gallons of each coating and cleanup material employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed, as applied;

f. the name and identification number of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all cleanup materials);

m. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

o. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in tons (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total gallons of cleanup materials employed (the sum of (i) for the previous 12 calendar months); and

q. the rolling, 12-month summation of the total gallons of coating employed (the sum of (e) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage and the cumulative coating usage for each calendar month.

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. the average hourly mass emission limitation for VOC;

b. the rolling, 12-month usage limitation of 851 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and

c. the rolling, 12-month usage limitation of 6,531 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

d. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

5.6 lbs VOC/gallon of cleanup material

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 4.96 lbs/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

d. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

e. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

f. Emission Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 14.46 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

E. Testing Requirements (continued)

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

a. Usage Restrictions

The maximum annual amount of cleanup material used shall not exceed 851 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

b. Usage Restrictions

The maximum annual amount of coating used shall not exceed 6,531 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K023 (Line 204, e-coat repair coat) Electrolytic dip applicaiton of repair coat material to converted can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 1 0 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K023 (Line 204, e-coat repair coat)
Electrolytic dip applicaiton of repair coat material to converted can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
electrolytic dip application of repair coat material to converted can ends; Line 205	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.24 lb/hr and 0.7 ton/year. See section B.1 below.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 0.7 ton per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.5 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 0.17 pound of VOC per gallon of coating, excluding water and exempt solvents.

2. The limitation for volatile organic compound emissions from this emissions unit of 0.7 ton per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved limiting the maximum annual amount of coating used to 8,285 gallons, based upon a rolling, 12-month summation of the amount of coating used each month.

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	690
1-2	1,381
1-3	2,071
1-4	2,762
1-5	3,452
1-6	4,142
1-7	4,833
1-8	5,523
1-9	6,214
1-10	6,904
1-11	7,595
1-12	8,285

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

4. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating employed:

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

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

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the total individual HAP usage from all coatings employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings);

   g. the total combined HAP usage from all coatings employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings);

   h. the total VOC emissions from all coatings employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings);

   i. the rolling, 12-month summation of individual HAP usage from all coatings employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

   j. the rolling, 12-month summation of the total combined HAP usage from all coatings employed, in pounds or tons per year (the sum of (g) for the previous 12 calendar months);

   k. the rolling, 12-month summation of the total VOC emissions from all coatings employed, in pounds or tons per year (the sum of (h) for the previous 12 calendar months); and

   l. the rolling, 12-month summation of the total gallons of coating employed (the sum of (e) for the previous 12 calendar months).

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

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

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 8,245 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.24 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

c. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

d. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

e. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.7 ton per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

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

a. Usage Restrictions

The maximum annual amount of coating used shall not exceed 8,285 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.l.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K024 (Line 204, conversion press) Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 1 9 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K024 (Line 204, conversion press)
Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wipe application of tab lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press; Line 204	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.76 lb/hr and 2.21 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 2.21 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.7 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for VOC emissions from this emissions unit of 2.21 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;

b. the maximum annual amount of rust inhibitor used shall not exceed 292 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used each month;

c. the maximum annual amount of repair coat used shall not exceed 1,168 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

d. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use);

e. the VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

f. the VOC content of the repair coat used shall not exceed 0.09 lb/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	49
1-2	98
1-3	147
1-4	196
1-5	245
1-6	294
1-7	343
1-8	392
1-9	441
1-10	490
1-11	539
1-12	588

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the rust inhibitor usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Rust Inhibitor Usage (gallons)
1	24
1-2	49
1-3	73
1-4	97
1-5	122
1-6	146
1-7	170
1-8	195
1-9	219
1-10	243
1-11	268
1-12	292

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

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	97
1-2	195
1-3	292
1-4	389
1-5	487
1-6	584
1-7	681
1-8	779
1-9	876
1-10	973
1-11	1,071
1-12	1,168

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

6. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emission unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant, rust inhibitor, and repair coat employed;

b. the number of gallons of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all tab lubricants, rust inhibitors, and repair coats, in pounds per hour (average); and

f. the total volume, in gallons, of all the tab lubricants, rust inhibitors, and repair coats employed.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each tab lubricant, rust inhibitor, and repair coat material employed:

a. the name and identification number of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each tab lubricant employed, as applied;

f. the individual HAP content for each HAP of each rust inhibitor, in pounds of individual HAP per gallon of rust inhibitor, as applied;

g. the total combined HAP content of each rust inhibitor, in pounds of combined HAPs per gallon of rust inhibitor, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of rust inhibitor employed;

i. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

j. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (i));

k. the number of gallons of repair coat employed;

l. the total individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all tab lubricants plus the sum of (f) times (h) for all of the rust inhibitors plus the sum of (i) times (k) for all of the repair coatings);

m. the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants plus the sum of (g) times (h) for all of the rust inhibitors plus the sum of (j) times (k) for all repair coatings);

n. the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants plus the sum of (b) times (h) for all rust inhibitors plus the sum of (b) times (k) for all repair coatings);

o. the rolling, 12-month summation of individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (m) for the previous 12 calendar months);

q. the rolling, 12-month summation of the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (n) for the previous 12 calendar months);

r. the rolling, 12-month summation of the gallons of tab lubricant employed (the sum of (e) for the previous 12 calendar months);

s. the rolling, 12-month summation of the gallons of rust inhibitor employed (the sum of (h) for the previous 12 calendar months); and

C. Monitoring and/or Record Keeping Requirements (continued)

t. the rolling, 12-month summation of the gallons of repair coat employed (the sum of (k) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage, the cumulative rust inhibitor usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 588 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant usage levels;

   c. the rolling, 12-month usage limitation of 292 gallons of rust inhibitors and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative rust inhibitor usage levels;

   d. the rolling, 12-month usage limitation of 1,168 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   e. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes tab lubricants, rust inhibitors, and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily combined usage limit for tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation:

The VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation:

The VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation:

The VOC content of the repair coat used shall not exceed 0.09 lb/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

d. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 0.76 lb/hr.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

E. Testing Requirements (continued)

e. Emissions Limitation:

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

f. Emissions Limitation:

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

g. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 2.21 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

E. Testing Requirements (continued)

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

a. Usage Restriction:

The maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.r.

b. Usage Restriction:

The maximum annual amount of rust inhibitor used shall not exceed 292 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.s.

c. Usage Restriction:

The maximum annual amount of repair coat used shall not exceed 1,168 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.t.

d. Usage Restriction:

The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K025 (Line 205, blanked end liner) Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 1 9 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K025 (Line 205, blanked end liner)
Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner 205: spray application of an end seal compound to the inner lip of unfinished 2- and 3-piece can ends	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit including cleanup material shall not exceed 0.28 lb/hr and 0.8 ton/year.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.1 through B.4 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAPs); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The limitation for VOC emissions from this emissions unit of 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

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

b. the maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month; and

c. the VOC content of the cleanup material used shall not exceed 6.6 lbs/gal. Other materials may be used if approved by the Canton local air agency prior to initial use.

B. Operational Restrictions (continued)

2. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	20
1-2	41
1-3	61
1-4	81
1-5	102
1-6	122
1-7	142
1-8	163
1-9	183
1-10	203
1-11	224
1-12	244

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

3. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent- based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating and cleanup material employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

   b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the name and identification number of each cleanup material employed;

   g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

   h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

   i. the number of gallons of each cleanup material employed;

   j. the total individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all coatings plus the sum of (g) times (i) for all of the cleanup materials);

   k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

C. Monitoring and/or Record Keeping Requirements (continued)

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all cleanup materials);

m. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

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

p. the rolling, 12-month summation of the total gallons of cleanup material employed (the sum of (i) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

C. Monitoring and/or Record Keeping Requirements (continued)

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. the average hourly mass emission limitation for VOC;

b. the rolling, 12-month usage limitation of 244 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and

c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

1.a Emissions Limitation
0.00 lb VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

1.b Emissions Limitation
6.6 lbs VOC/gallon of cleanup

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

E. Testing Requirements (continued)

1.c Emissions Limitation
The VOC emissions from this emissions unit shall not exceed 0.28 lb/hr.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

1.d Emissions Limitation
The VOC emissions from this emissions unit shall not exceed 0.80 ton/yr based upon a rolling, 12-month summation.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

1.e Emissions Limitation
The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

1.f Emissions Limitation
The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

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

2.a Usage Restrictions
The maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K026 (Line 205, e-coat repair coat) Electrolytic dip application of repair coat material to converted can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 1 0 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K026 (Line 205, e-coat repair coat)
Electrolytic dip application of repair coat material to converted can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
electrolytic dip application of repair coat material to converted can ends; Line 205	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.46 lb/hr and 1.33 tons/year. See section B.1 below.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 1.33 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.5 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 0.17 pound of VOC per gallon of coating, excluding water and exempt solvents.

2. The limitation for volatile organic compound emissions from this emissions unit of 1.33 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved limiting the maximum annual amount of coating used to 15,698 gallons, based upon a rolling, 12-month summation of the amount of coating used each month.

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	1,308
1-2	2,616
1-3	3,924
1-4	5,233
1-5	6,541
1-6	7,849
1-7	9,157
1-8	10,465
1-9	11,773
1-10	13,082
1-11	14,390
1-12	15,698

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

4. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating employed:

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

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

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the total individual HAP usage from all coatings employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings);

   g. the total combined HAP usage from all coatings employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings);

   h. the total VOC emissions from all coatings employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings);

   i. the rolling, 12-month summation of individual HAP usage from all coatings employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

   j. the rolling, 12-month summation of the total combined HAP usage from all coatings employed, in pounds or tons per year (the sum of (g) for the previous 12 calendar months);

   k. the rolling, 12-month summation of the total VOC emissions from all coatings employed, in pounds or tons per year (the sum of (h) for the previous 12 calendar months); and

   l. the rolling, 12-month summation of the total gallons of coating employed (the sum of (e) for the previous 12 calendar months).

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

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

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 15,698 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.46 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

c. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

d. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

e. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 1.33 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

E. Testing Requirements (continued)

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

   a. Usage Restrictions

   The maximum annual amount of coating used shall not exceed 15,698 gallons, based upon a rolling, 12-month summation of the amount of coating used.

   Applicable Compliance Method

   Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.I.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K027 (Line 205, conversion press) Wipe applicaiton of lubricant to unconverted can ends for tab attachment in conversion press.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K027 (Line 205, conversion press)
Wipe applicaiton of lubricant to unconverted can ends for tab attachment in conversion press.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wipe application of tab lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press; Line 205	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.79 lb/hr and 2.31 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 2.31 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.7 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. Additional Terms and Conditions

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for VOC emissions from this emissions unit of 2.31 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;

b. the maximum annual amount of rust inhibitor used shall not exceed 342 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used each month;

c. the maximum annual amount of repair coat used shall not exceed 1,369 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

d. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use);

e. the VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

f. the VOC content of the repair coat used shall not exceed 0.09 lb/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	49
1-2	98
1-3	147
1-4	196
1-5	245
1-6	294
1-7	343
1-8	392
1-9	441
1-10	490
1-11	539
1-12	588

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the rust inhibitor usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Rust Inhibitor Usage (gallons)
1	29
1-2	57
1-3	86
1-4	114
1-5	143
1-6	171
1-7	200
1-8	228
1-9	257
1-10	285
1-11	314
1-12	342

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

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	114
1-2	228
1-3	342
1-4	456
1-5	570
1-6	685
1-7	799
1-8	913
1-9	1,027
1-10	1,141
1-11	1,255
1-12	1,369

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

6. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emission unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant, rust inhibitor, and repair coat employed;

b. the number of gallons of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all tab lubricants, rust inhibitors, and repair coats, in pounds per hour (average); and

f. the total volume, in gallons, of all the tab lubricants, rust inhibitors, and repair coats employed.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each tab lubricant, rust inhibitor, and repair coat material employed:

a. the name and identification number of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each tab lubricant employed, as applied;

f. the individual HAP content for each HAP of each rust inhibitor, in pounds of individual HAP per gallon of rust inhibitor, as applied;

g. the total combined HAP content of each rust inhibitor, in pounds of combined HAPs per gallon of rust inhibitor, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of rust inhibitor employed;

i. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

j. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (i));

k. the number of gallons of repair coat employed;

l. the total individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all tab lubricants plus the sum of (f) times (h) for all of the rust inhibitors plus the sum of (i) times (k) for all of the repair coatings);

m. the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants plus the sum of (g) times (h) for all of the rust inhibitors plus the sum of (j) times (k) for all repair coatings);

n. the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants plus the sum of (b) times (h) for all rust inhibitors plus the sum of (b) times (k) for all repair coatings);

o. the rolling, 12-month summation of individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (m) for the previous 12 calendar months);

q. the rolling, 12-month summation of the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (n) for the previous 12 calendar months);

r. the rolling, 12-month summation of the gallons of tab lubricant employed (the sum of (e) for the previous 12 calendar months);

s. the rolling, 12-month summation of the gallons of rust inhibitor employed (the sum of (h) for the previous 12 calendar months); and

C. Monitoring and/or Record Keeping Requirements (continued)

t. the rolling, 12-month summation of the gallons of repair coat employed (the sum of (k) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage, the cumulative rust inhibitor usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 588 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant usage levels;

   c. the rolling, 12-month usage limitation of 342 gallons of rust inhibitors and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative rust inhibitor usage levels;

   d. the rolling, 12-month usage limitation of 1,369 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   e. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes tab lubricants, rust inhibitors, and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily combined usage limit for tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation:

The VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation:

The VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation:

The VOC content of the repair coat used shall not exceed 0.09 lb/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

d. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 0.79 lb/hr.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

E. Testing Requirements (continued)

e. Emissions Limitation:

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

f. Emissions Limitation:

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

g. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 2.31 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

E. Testing Requirements (continued)

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

a. Usage Restriction:

The maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.r.

b. Usage Restriction:

The maximum annual amount of rust inhibitor used shall not exceed 342 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.s.

c. Usage Restriction:

The maximum annual amount of repair coat used shall not exceed 1,369 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.t.

d. Usage Restriction:

The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: **Final Chapter 3745-35 Permit To Operate**

K028 (Line 206, blanked end liner) Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

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Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K028 (Line 206, blanked end liner)
Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

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The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner 201: spray application of an end seal compound to the inner lip of unfinished 2- and 3-piece can ends	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 4.65 lbs/hr and 13.57 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	Volatile organic compound emissions from this emissions unit shall not exceed 13.57 tons per year based upon a rolling, 12-month summation of the monthly emissions See A.2.a and B.2 through B.6 below.
	OAC rule 3745-21-09(D)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

B. Operational Restrictions (continued)

2. The limitation for volatile organic compound emissions from this emissions unit of 13.57 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

   a. the maximum annual amount of coating used shall not exceed 6,048 gallons, based upon a rolling, 12-month summation of the amount of coating used each month;

   b. the maximum annual amount of cleanup material used shall not exceed 851 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month; and

   c. the VOC content of the cleanup material used shall not exceed 5.6 lbs/gal. Other materials may be used if approved by the Canton local air agency prior to initial use.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	71
1-2	142
1-3	213
1-4	284
1-5	355
1-6	426
1-7	497
1-8	568
1-9	639
1-10	709
1-11	781
1-12	851

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

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	504
1-2	1,008
1-3	1,512
1-4	2,016
1-5	2,520
1-6	4,024
1-7	4,528
1-8	5,032
1-9	5,536
1-10	6,040
1-11	6,544
1-12	6,048

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

B. Operational Restrictions (continued)

5. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

   *The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating and cleanup material employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed, as applied;

f. the name and identification number of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all cleanup materials);

m. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

o. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in tons (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total gallons of cleanup materials employed (the sum of (i) for the previous 12 calendar months); and

q. the rolling, 12-month summation of the total gallons of coating employed (the sum of (e) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage and the cumulative coating usage for each calendar month.

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044),was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 851 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and

   c. the rolling, 12-month usage limitation of 6,048 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   d. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

5.6 lbs VOC/gallon of cleanup material

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 4.65 lbs/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

d. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

e. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

f. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 13.57 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

E. Testing Requirements (continued)

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

a. Usage Restrictions

The maximum annual amount of cleanup material used shall not exceed 851 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

b. Usage Restriction

The maximum annual amount of coating used shall not exceed 6,048 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K030 (Line 206, conversion press) Wipe applicaiton of lubricant to unconverted can ends for tab attachment in conversion press.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K030 (Line 206, conversion press)
Wipe applicaiton of lubricant to unconverted can ends for tab attachment in conversion press.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wipe application of tab lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press; Line 201	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.76 lb/hr and 2.21 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 2.21 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.7 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. Additional Terms and Conditions

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for VOC emissions from this emissions unit of 2.21 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;

b. the maximum annual amount of rust inhibitor used shall not exceed 292 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used each month;

c. the maximum annual amount of repair coat used shall not exceed 1,168 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

d. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use);

e. the VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

f. the VOC content of the repair coat used shall not exceed 0.09 lb/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	49
1-2	98
1-3	147
1-4	196
1-5	245
1-6	294
1-7	343
1-8	392
1-9	441
1-10	490
1-11	539
1-12	588

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the rust inhibitor usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Rust Inhibitor Usage (gallons)
1	24
1-2	49
1-3	73
1-4	97
1-5	122
1-6	146
1-7	170
1-8	195
1-9	219
1-10	243
1-11	268
1-12	292

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

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	97
1-2	195
1-3	292
1-4	389
1-5	487
1-6	584
1-7	681
1-8	779
1-9	876
1-10	973
1-11	1,071
1-12	1,168

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

6. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emission unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant, rust inhibitor, and repair coat employed;

b. the number of gallons of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all tab lubricants, rust inhibitors, and repair coats, in pounds per hour (average); and

f. the total volume, in gallons, of all the tab lubricants, rust inhibitors, and repair coats employed.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each tab lubricant, rust inhibitor, and repair coat material employed:

a. the name and identification number of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each tab lubricant employed, as applied;

f. the individual HAP content for each HAP of each rust inhibitor, in pounds of individual HAP per gallon of rust inhibitor, as applied;

g. the total combined HAP content of each rust inhibitor, in pounds of combined HAPs per gallon of rust inhibitor, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of rust inhibitor employed;

i. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

j. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (i));

k. the number of gallons of repair coat employed;

l. the total individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all tab lubricants plus the sum of (f) times (h) for all of the rust inhibitors plus the sum of (i) times (k) for all of the repair coatings);

m. the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants plus the sum of (g) times (h) for all of the rust inhibitors plus the sum of (j) times (k) for all repair coatings);

n. the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants plus the sum of (b) times (h) for all rust inhibitors plus the sum of (b) times (k) for all repair coatings);

o. the rolling, 12-month summation of individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (m) for the previous 12 calendar months);

q. the rolling, 12-month summation of the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (n) for the previous 12 calendar months);

r. the rolling, 12-month summation of the gallons of tab lubricant employed (the sum of (e) for the previous 12 calendar months);

s. the rolling, 12-month summation of the gallons of rust inhibitor employed (the sum of (h) for the previous 12 calendar months); and

C. Monitoring and/or Record Keeping Requirements (continued)

t. the rolling, 12-month summation of the gallons of repair coat employed (the sum of (k) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage, the cumulative rust inhibitor usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 588 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant usage levels;

   c. the rolling, 12-month usage limitation of 292 gallons of rust inhibitors and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative rust inhibitor usage levels;

   d. the rolling, 12-month usage limitation of 1,168 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   e. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes tab lubricants, rust inhibitors, and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily combined usage limit for tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation:

The VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation:

The VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation:

The VOC content of the repair coat used shall not exceed 0.09 lb/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

d. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 0.76 lb/hr.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

E. Testing Requirements (continued)

e. Emissions Limitation:

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

f. Emissions Limitation:

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

g. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 2.21 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

E. Testing Requirements (continued)

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

a. Usage Restriction:

The maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.r.

b. Usage Restriction:

The maximum annual amount of rust inhibitor used shall not exceed 292 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.s.

c. Usage Restriction:

The maximum annual amount of repair coat used shall not exceed 1,168 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.t.

d. Usage Restriction:

The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K031 (Line 207, blanked end liner) Spray applicaiton of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K031 (Line 207, blanked end liner)
Spray applicaiton of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner 207: spray application of an end seal compound to the inner lip of unfinished 2- and 3-piece can ends	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit including cleanup material shall not exceed 0.28 lb/hr and 0.8 ton/year.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.1 through B.4 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAPs); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The limitation for VOC emissions from this emissions unit of 0.8 ton per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

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

b. the maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month; and

c. the VOC content of the cleanup material used shall not exceed 6.6 lbs/gal. Other materials may be used if approved by the Canton local air agency prior to initial use.

B. Operational Restrictions (continued)

2. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	20
1-2	41
1-3	61
1-4	81
1-5	102
1-6	122
1-7	142
1-8	163
1-9	183
1-10	203
1-11	224
1-12	244

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

3. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent- based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating and cleanup material employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

   b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the name and identification number of each cleanup material employed;

   g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

   h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

   i. the number of gallons of each cleanup material employed;

   j. the total individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all coatings plus the sum of (g) times (i) for all of the cleanup materials);

   k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

C. Monitoring and/or Record Keeping Requirements (continued)

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all cleanup materials);

m. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

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

p. the rolling, 12-month summation of the total gallons of cleanup material employed (the sum of (i) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

C. Monitoring and/or Record Keeping Requirements (continued)

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. the average hourly mass emission limitation for VOC;

b. the rolling, 12-month usage limitation of 244 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels; and

c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

1.a Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

1.b Emissions Limitation

6.6 lbs VOC/gallon of cleanup

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

E. Testing Requirements (continued)

1.c Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 0.28 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

1.d Emissions Limitation

The VOC emissions from this emissions unit shall not exceed 0.80 ton/yr based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

1.e Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

1.f Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

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

2.a Usage Restrictions

The maximum annual amount of cleanup material used shall not exceed 244 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K032 (Line 207, e-coat repair coat) Electrolytic dip application of repair coat material to converted can ends.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K032 (Line 207, e-coat repair coat)
Electrolytic dip application of repair coat material to converted can ends.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
electrolytic dip application of repair coat material to converted can ends; Line 207	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.36 lb/hr and 1.06 tons/year. See section B.1 below.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.5 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 0.17 pound of VOC per gallon of coating, excluding water and exempt solvents.

2. The limitation for volatile organic compound emissions from this emissions unit of 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved limiting the maximum annual amount of coating used to 12,432 gallons, based upon a rolling, 12-month summation of the amount of coating used each month.

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	1,036
1-2	2,072
1-3	3,108
1-4	4,144
1-5	5,180
1-6	6,216
1-7	7,252
1-8	8,288
1-9	9,324
1-10	10,360
1-11	11,396
1-12	12,432

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

4. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating employed:

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

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

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the total VOC emissions from all coatings employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings);

   g. the rolling, 12-month summation of individual HAP usage from all coatings employed, in pounds or tons per year (the sum of (c) for the previous 12 calendar months);

   h. the rolling, 12-month summation of the total combined HAP usage from all coatings employed, in pounds or tons per year (the sum of (d) for the previous 12 calendar months);

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

   j. the rolling, 12-month summation of the total gallons of coatings employed (the sum of (e) for the previous 12 calendar months).

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

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

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044),was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: MIBK
   TLV (mg/m3): 234
   Maximum Hourly Emission Rate (lbs/hr): 7.11
   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
   MAGLC (ug/m3): 5,571

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

   c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. the average hourly mass emission limitation for VOC;

b. the rolling, 12-month usage limitation of 12,432 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.36 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

c. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

d. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

e. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

E. Testing Requirements (continued)

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

a. Usage Restrictions

The maximum annual amount of coating used shall not exceed 12,432 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.I.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K033 (Line 207, conversion press) Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K033 (Line 207, conversion press)
Wipe application of lubricant to unconverted can ends for tab attachment in conversion press.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wipe application of tab lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press; Line 207	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.78 lb/hr and 2.27 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.7 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. Additional Terms and Conditions

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for VOC emissions from this emissions unit of 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;

b. the maximum annual amount of rust inhibitor used shall not exceed 319 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used each month;

c. the maximum annual amount of repair coat used shall not exceed 1,277 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

d. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use);

e. the VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

f. the VOC content of the repair coat used shall not exceed 0.09 lb/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	49
1-2	98
1-3	147
1-4	196
1-5	245
1-6	294
1-7	343
1-8	392
1-9	441
1-10	490
1-11	539
1-12	588

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the rust inhibitor usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Rust Inhibitor Usage (gallons)
1	27
1-2	53
1-3	80
1-4	106
1-5	133
1-6	159
1-7	186
1-8	213
1-9	239
1-10	266
1-11	292
1-12	319

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

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	106
1-2	213
1-3	319
1-4	426
1-5	532
1-6	638
1-7	745
1-8	851
1-9	958
1-10	1,064
1-11	1,170
1-12	1,277

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

6. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emission unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant, rust inhibitor, and repair coat employed;

b. the number of gallons of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all tab lubricants, rust inhibitors, and repair coats, in pounds per hour (average); and

f. the total volume, in gallons, of all the tab lubricants, rust inhibitors, and repair coats employed.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each tab lubricant, rust inhibitor, and repair coat material employed:

a. the name and identification number of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each tab lubricant employed, as applied;

f. the individual HAP content for each HAP of each rust inhibitor, in pounds of individual HAP per gallon of rust inhibitor, as applied;

g. the total combined HAP content of each rust inhibitor, in pounds of combined HAPs per gallon of rust inhibitor, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of rust inhibitor employed;

i. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

j. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (i));

k. the number of gallons of repair coat employed;

l. the total individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all tab lubricants plus the sum of (f) times (h) for all of the rust inhibitors plus the sum of (i) times (k) for all of the repair coatings);

m. the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants plus the sum of (g) times (h) for all of the rust inhibitors plus the sum of (j) times (k) for all repair coatings);

n. the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants plus the sum of (b) times (h) for all rust inhibitors plus the sum of (b) times (k) for all repair coatings);

o. the rolling, 12-month summation of individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (m) for the previous 12 calendar months);

q. the rolling, 12-month summation of the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (n) for the previous 12 calendar months);

r. the rolling, 12-month summation of the gallons of tab lubricant employed (the sum of (e) for the previous 12 calendar months);

s. the rolling, 12-month summation of the gallons of rust inhibitor employed (the sum of (h) for the previous 12 calendar months); and

C. Monitoring and/or Record Keeping Requirements (continued)

t. the rolling, 12-month summation of the gallons of repair coat employed (the sum of (k) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage, the cumulative rust inhibitor usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 588 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant usage levels;

   c. the rolling, 12-month usage limitation of 319 gallons of rust inhibitors and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative rust inhibitor usage levels;

   d. the rolling, 12-month usage limitation of 1,277 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   e. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes tab lubricants, rust inhibitors, and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily combined usage limit for tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation:

The VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation:

The VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation:

The VOC content of the repair coat used shall not exceed 0.09 lb/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

d. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 0.78 lb/hr.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

E. Testing Requirements (continued)

e. Emissions Limitation:

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

f. Emissions Limitation:

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

g. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

E. Testing Requirements (continued)

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

a. Usage Restriction:

The maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.r.

b. Usage Restriction:

The maximum annual amount of rust inhibitor used shall not exceed 319 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.s.

c. Usage Restriction:

The maximum annual amount of repair coat used shall not exceed 1,277 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.t.

d. Usage Restriction:

The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K040 (Line 208, post-repair spray) Post-repair Spray.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K040 (Line 208, post-repair spray)
Post-repair Spray.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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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.)

4. 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 the permit. Such records may be maintained in computerized form.

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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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
post repair spray for coating the inside score line of easy-open can ends; Line 208	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 5.3 lbs/hr and 6.33 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	VOC emissions from this emissions unit shall not exceed 6.33 tons per year based upon a rolling, 12-month summation of the monthly emissions See sections A.2.a and B.2 through B.6 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily usage rate of repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for volatile organic compound emissions from this emissions unit of 6.33 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of repair coat used shall not exceed 2,226 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

b. the maximum annual amount of cleanup material used shall not exceed 180 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month;

c. the VOC content of the repair coat used shall not exceed 5.15 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

d. the VOC content of the cleanup material used shall not exceed 6.67 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	186
1-2	371
1-3	557
1-4	742
1-5	928
1-6	1,113
1-7	1,299
1-8	1,484
1-9	1,670
1-10	1,855
1-11	2,041
1-12	2,226

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	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 following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

5. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 cleanup material and repair coat employed;

b. the number of gallons of each cleanup material and repair coat employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each cleanup material and repair coat employed, as applied;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all cleanup material and repair coat, in pounds per hour (average); and

f. the total volume, in gallons, of all the cleanup materials and repair coats employed.

2. The permittee shall collect and record the following information for each month for each cleanup material and repair coat material employed:

a. the name and identification number of each cleanup material and repair coat employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each cleanup material and repair coat employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

d. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each cleanup material employed, as applied;

f. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

g. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of repair coat employed;

i. the total individual HAP usage from all cleanup materials and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all cleanup materials plus the sum of (f) times (h) for all of the repair coats);

j. the total combined HAP usage from all cleanup materials and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the cleanup materials plus the sum of (g) times (h) for all of the repair coats);

C. Monitoring and/or Record Keeping Requirements (continued)

k. the total VOC emissions from all cleanup materials and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the cleanup materials plus the sum of (b) times (h) for all repair coats);

l. the rolling, 12-month summation of individual HAP usage from all cleanup materials and repair coats employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);

m. the rolling, 12-month summation of the total combined HAP usage from all cleanup materials and repair coats employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of total VOC emissions from all cleanup materials and repair coats employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

o. the rolling, 12-month summation of the gallons of repair coats employed, (the sum of (h) for the previous 12 calendar months); and

p. the rolling, 12-month summation of the gallons of cleanup materials employed, (the sum of (e) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

C. Monitoring and/or Record Keeping Requirements (continued)

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 previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying cleanup materials and/or repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 180 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels;

   c. the rolling, 12-month usage limitation of 2,226 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   d. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes cleanup material and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements (continued)

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily usage limit for repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation

The VOC content of the cleanup materials used shall not exceed 6.67 lbs/gal.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

The VOC content of the repair coat used shall not exceed 5.15 lbs/gal.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 5.3 lbs/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

d. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

e. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.l.

E. Testing Requirements (continued)

f. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 6.33 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

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

a. Usage Restrictions

The maximum annual amount of cleanup material used shall not exceed 180 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

b. Usage Restrictions

The maximum annual amount of repair coat used shall not exceed 2,226 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

c. Usage Restriction

The maximum daily usage rate of repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K041 (Line 206, post-repair spray) Post-repair Spray.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K041 (Line 206, post-repair spray)
Post-repair Spray.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
post repair spray for coating the inside score line of easy-open can ends; Line 201	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 5.3 lbs/hr and 6.33 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	VOC emissions from this emissions unit shall not exceed 6.33 tons per year based upon a rolling, 12-month summation of the monthly emissions See sections A.2.a and B.2 through B.6 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily usage rate of repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for volatile organic compound emissions from this emissions unit of 6.33 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

   a. the maximum annual amount of repair coat used shall not exceed 2,226 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

   b. the maximum annual amount of cleanup material used shall not exceed 180 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month;

   c. the VOC content of the repair coat used shall not exceed 5.15 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

   d. the VOC content of the cleanup material used shall not exceed 6.67 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	186
1-2	371
1-3	557
1-4	742
1-5	928
1-6	1,113
1-7	1,299
1-8	1,484
1-9	1,670
1-10	1,855
1-11	2,041
1-12	2,226

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	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 following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

5. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 cleanup material and repair coat employed;

   b. the number of gallons of each cleanup material and repair coat employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each cleanup material and repair coat employed, as applied;

   d. the total number of hours the emissions unit was in operation;

   e. the average hourly VOC emission rates for all cleanup material and repair coat, in pounds per hour (average); and

   f. the total volume, in gallons, of all the cleanup materials and repair coats employed.

2. The permittee shall collect and record the following information for each month for each cleanup material and repair coat material employed:

   a. the name and identification number of each cleanup material and repair coat employed, as applied;

   b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each cleanup material and repair coat employed, as applied;

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

   d. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each cleanup material employed, as applied;

   f. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

   g. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (f));

   h. the number of gallons of repair coat employed;

   i. the total individual HAP usage from all cleanup materials and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all cleanup materials plus the sum of (f) times (h) for all of the repair coats);

   j. the total combined HAP usage from all cleanup materials and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the cleanup materials plus the sum of (g) times (h) for all of the repair coats);

C. Monitoring and/or Record Keeping Requirements (continued)

k. the total VOC emissions from all cleanup materials and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the cleanup materials plus the sum of (b) times (h) for all repair coats);

l. the rolling, 12-month summation of individual HAP usage from all cleanup materials and repair coats employed, in pounds or tons per year (the sum of (i) for the previous 12 calendar months);

m. the rolling, 12-month summation of the total combined HAP usage from all cleanup materials and repair coats employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months);

n. the rolling, 12-month summation of total VOC emissions from all cleanup materials and repair coats employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months);

o. the rolling, 12-month summation of the gallons of repair coats employed, (the sum of (h) for the previous 12 calendar months); and

p. the rolling, 12-month summation of the gallons of cleanup materials employed, (the sum of (e) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

C. Monitoring and/or Record Keeping Requirements (continued)

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 previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying cleanup materials and/or repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 180 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels;

   c. the rolling, 12-month usage limitation of 2,226 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   d. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes cleanup material and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements (continued)

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily usage limit for repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation

The VOC content of the cleanup materials used shall not exceed 6.67 lbs/gal.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

The VOC content of the repair coat used shall not exceed 5.15 lbs/gal.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 5.3 lbs/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

d. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.m.

e. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.l.

E. Testing Requirements (continued)

f. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 6.33 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.n.

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

a. Usage Restrictions

The maximum annual amount of cleanup material used shall not exceed 180 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

b. Usage Restrictions

The maximum annual amount of repair coat used shall not exceed 2,226 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

c. Usage Restriction

The maximum daily usage rate of repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K042 (Line 206, blanked end liner) Blanked end liner.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 13
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K042 (Line 206, blanked end liner)
Blanked end liner.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
blanked end liner, spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends with a thermal oxidizer; Line 206	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.94 lb/hr and 2.75 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	VOC emissions from this emissions unit shall not exceed 2.75 tons per year based upon a rolling, 12-month summation of the monthly emissions See sections A.2.a and B.2 through B.8 below.
	OAC rule 3745-21-09(D)(2)(e)	See section B.1 below.

2. Additional Terms and Conditions

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAPs); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. The permittee shall employ a thermal oxidizer whenever this emissions unit is employing a coating which contains any VOCs. The capture and control system shall provide not less than an eighty-one percent reduction, by weight, in the overall VOC emissions from the coating line and the control equipment shall have an efficiency of not less than ninety percent, by weight, for the VOC emissions vented to the control equipment.

B. Operational Restrictions (continued)

3. The limitation for volatile organic compound emissions from this emissions unit of 2.75 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

a. the maximum annual amount of coating used shall not exceed 6,531 gallons, based upon a rolling, 12-month summation of the amount of coating used each month;

b. the maximum annual amount of cleanup material used shall not exceed 851 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used each month; and

c. the VOC content of the cleanup material used shall not exceed 5.6 lbs/gal* (other materials may be used if approved by the Canton local air agency prior to initial use)

*When water-based coatings are being applied, the VOC content of the cleanup material shall not exceed 6.6 lbs/gal.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Material Usage (gallons)
1	71
1-2	142
1-3	213
1-4	284
1-5	355
1-6	426
1-7	497
1-8	568
1-9	639
1-10	709
1-11	781
1-12	851

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

B. Operational Restrictions (continued)

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	544
1-2	1,089
1-3	1,633
1-4	2,177
1-5	2,721
1-6	3,266
1-7	3,810
1-8	4,354
1-9	4,898
1-10	5,443
1-11	5,987
1-12	6,531

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

6. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent- based coatings).

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

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

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

8. The water-based coating employed shall not contain any VOCs.

C. Monitoring and/or Record Keeping 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 employed;

b. the number of gallons of each coating and cleanup material employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly uncontrolled VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating and cleanup material employed:

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

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed, as applied;

f. the name and identification number of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all coatings plus the sum of (g) times (i) for all of the cleanup materials);

C. Monitoring and/or Record Keeping Requirements (continued)

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials);

l. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all cleanup materials);

m. the total controlled individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (j) times (0.19) when the solvent based scenario is operating and the sum of (j) when the water-based scenario is operating);

n. the total controlled combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (k) times (0.19) when the solvent based scenario is operating and the sum of (k) when the water-based scenario is operating);

o. the total controlled VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (l) times (0.19) when the solvent based scenario is operating and sum of (l) when the water-based scenario is operating);

p. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (m) for the previous 12 calendar months);

q. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (n) for the previous 12 calendar months);

r. the rolling, 12-month summation of the total combined controlled VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (o) for the previous 12 calendar months)

s. the rolling, 12-month summation of the gallons of coating employed, (the sum of (e) for the previous 12 calendar months); and

t. the rolling, 12-month summation of the gallons of cleanup materials employed, (the sum of (i) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative cleanup material usage and the cumulative coating usage for each calendar month.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

5. The permittee shall collect and record the following information for each day for the control equipment:

a. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

C. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. the calculated, uncontrolled VOC emission rate from all coatings and cleanup materials employed, in pounds or tons; and

b. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

7. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 851 gallons of cleanup material and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels;

   c. the rolling, 12-month usage limitation of 6,531 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   d. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

E. Testing Requirements

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

1.a Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

1.b Emissions Limitation

5.6 lbs VOC/gallon of cleanup material (6.6 lbs VOC/gallon when water-based coating is being used.)

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

1.c Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.94 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

E. Testing Requirements (continued)

1.d Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

1.e Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

1.f Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 2.75 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.r.

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

2.a Usage Restriction

The maximum annual amount of cleanup material used shall not exceed 851 gallons, based upon a rolling, 12-month summation of the amount of cleanup material used.

Applicable Compliance Method
Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.t.

2.b Usage Restriction

The maximum annual amount of coating used shall not exceed 6,531 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.s.

E. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months of permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs are specified below. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton local air agency.

F. Miscellaneous Requirements

None

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

CERTIFIED MAIL

11/10/03

RE: Final Chapter 3745-35 Permit To Operate

K043 (Line 206, e-coat repair coat) E-coat repair coat.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 19 [illegible]
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K043 (Line 206, e-coat repair coat)
E-coat repair coat.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
electrolytic dip application of repair coat material to converted can ends; Line 206	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.94 lb/hr and 2.75 tons/year. See section B.1 below.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.5 below.
	OAC rule 3745-21-09(D)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 0.17 pound of VOC per gallon of coating, excluding water and exempt solvents.

2. The limitation for volatile organic compound emissions from this emissions unit of 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved limiting the maximum annual amount of coating used to 12,432 gallons, based upon a rolling, 12-month summation of the amount of coating used each month.

B. Operational Restrictions (continued)

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage (gallons)
1	1,036
1-2	2,072
1-3	3,108
1-4	4,144
1-5	5,180
1-6	6,216
1-7	7,252
1-8	8,288
1-9	9,324
1-10	10,360
1-11	11,396
1-12	12,432

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

4. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emissions unit K042 (when applying solvent based coatings).

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

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

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

C. Monitoring and/or Record Keeping 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 employed;

   b. the number of gallons of each coating employed, as applied;

   c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating employed, as applied;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly VOC emission rates for all coatings, in pounds per hour (average).

2. The permittee shall collect and record the following information for each month for each coating employed:

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

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

   c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

   d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

   e. the number of gallons of each coating employed, as applied;

   f. the total individual HAP usage from all coatings employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings);

   g. the total combined HAP usage from all coatings employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings);

   h. the total VOC emissions from all coatings employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings);

   i. the rolling, 12-month summation of individual HAP usage from all coatings employed, in pounds or tons per year (the sum of (f) for the previous 12 calendar months);

   j. the rolling, 12-month summation of the total combined HAP usage from all coatings employed, in pounds or tons per year (the sum of (g) for the previous 12 calendar months);

   k. the rolling, 12-month summation of the total VOC emissions from all coatings employed, in pounds or tons per year (the sum of (h) for the previous 12 calendar months); and

   l. the rolling, 12-month summation of the total gallons of coating employed (the sum of (e) for the previous 12 calendar months).

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

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

C. Monitoring and/or Record Keeping Requirements (continued)

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044),was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

D. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 12,432 gallons of coating and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels; and

   c. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emissions Limitation

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

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 0.36 lb/hr.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

c. Emissions Limitation

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.j.

d. Emissions Limitation

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.i.

e. Emissions Limitation

Volatile organic compound emissions from this emissions unit shall not exceed 1.06 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.k.

E. Testing Requirements (continued)

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

a. Usage Restrictions

The maximum annual amount of coating used shall not exceed 12,432 gallons, based upon a rolling, 12-month summation of the amount of coating used.

Applicable Compliance Method

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.I.

F. Miscellaneous Requirements

None

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

11/10/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K044 (Line 206, conversion press) Conversion Press.

Sonoco-Phoenix Inc Warner (15-76-05-1610)
Tony Logozzo
2121 Warner Rd S.E.
Canton, OH 44707

RECEIVED
NOV 1 3 2003
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

Dear Tony Logozzo:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Canton Division of Air Pollution Control.

Sincerely,

Michael W. Ahern

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

cc: Canton Division of Air Pollution Control

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/10/03

Expiration Date: 11/10/08

This document constitutes issuance to:

Facility ID: 15-76-05-1610
Sonoco-Phoenix Inc Warner
2121 Warner Rd
Canton, OH 44707

of a permit to operate for:

K044 (Line 206, conversion press)
Conversion Press.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wipe application of tab lubricant, rust inhibitor, and repair coat to unconverted can ends for tab attachment in conversion press; Line 206	OAC rule 3745-31-05(A)(3) (PTI 15-01433)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.78 lb/hr and 2.27 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	The VOC emissions from this emissions unit shall not exceed 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions. See sections A.2.a and B.2 through B.7 below.
	OAC rule 3745-21-09(U)(2)(e)	See section B.1 below.

2. **Additional Terms and Conditions**

2.a The combined annual emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed the following as a rolling, 12-month summation:

i. 24.0 tons of all hazardous air pollutants (HAP); and

ii. 9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

B. Operational Restrictions (continued)

2. The limitation for VOC emissions from this emissions unit of 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions shall be achieved by the following:

   a. the maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used each month;

   b. the maximum annual amount of rust inhibitor used shall not exceed 319 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used each month;

   c. the maximum annual amount of repair coat used shall not exceed 1,277 gallons, based upon a rolling, 12-month summation of the amount of repair coat used each month;

   d. the VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use);

   e. the VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal (other materials may be used if approved by the Canton local air agency prior to initial use); and

   f. the VOC content of the repair coat used shall not exceed 0.09 lb/gal (other materials may be used if approved by the Canton local air agency prior to initial use).

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the tab lubricant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Tab Lubricant Usage (gallons)
1	49
1-2	98
1-3	147
1-4	196
1-5	245
1-6	294
1-7	343
1-8	392
1-9	441
1-10	490
1-11	539
1-12	588

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

B. Operational Restrictions (continued)

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the rust inhibitor usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Rust Inhibitor Usage (gallons)
1	27
1-2	53
1-3	80
1-4	106
1-5	133
1-6	159
1-7	186
1-8	213
1-9	239
1-10	266
1-11	292
1-12	319

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

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the repair coat usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Repair Coat Usage (gallons)
1	106
1-2	213
1-3	319
1-4	426
1-5	532
1-6	638
1-7	745
1-8	851
1-9	958
1-10	1,064
1-11	1,170
1-12	1,277

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

6. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

*The amount of HAPs used is more than the amount of HAPs emitted because some HAP emissions are controlled by a regenerative thermal oxidizer for emission unit K042 (when applying solvent- based coatings).

B. Operational Restrictions (continued)

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

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

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

C. Monitoring and/or Record Keeping 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 tab lubricant, rust inhibitor, and repair coat employed;

b. the number of gallons of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all tab lubricants, rust inhibitors, and repair coats, in pounds per hour (average); and

f. the total volume, in gallons, of all the tab lubricants, rust inhibitors, and repair coats employed.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each month for each tab lubricant, rust inhibitor, and repair coat material employed:

a. the name and identification number of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each tab lubricant, rust inhibitor, and repair coat employed, as applied;

c. the individual Hazardous Air Pollutant (HAP) content, for each HAP of each tab lubricant, in pounds of individual HAP per gallon of tab lubricant, as applied;

d. the total combined HAP content of each tab lubricant, in pounds of combined HAPs per gallon of tab lubricant, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each tab lubricant employed, as applied;

f. the individual HAP content for each HAP of each rust inhibitor, in pounds of individual HAP per gallon of rust inhibitor, as applied;

g. the total combined HAP content of each rust inhibitor, in pounds of combined HAPs per gallon of rust inhibitor, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of rust inhibitor employed;

i. the individual HAP content for each HAP of each repair coat, in pounds of individual HAP per gallon of repair coat, as applied;

j. the total combined HAP content of each repair coat, in pounds of combined HAPs per gallon of repair coat, as applied (sum all the individual HAP contents from (i));

k. the number of gallons of repair coat employed;

l. the total individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all tab lubricants plus the sum of (f) times (h) for all of the rust inhibitors plus the sum of (i) times (k) for all of the repair coatings);

m. the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (d) times (e) for all of the tab lubricants plus the sum of (g) times (h) for all of the rust inhibitors plus the sum of (j) times (k) for all repair coatings);

n. the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per month (the sum of (b) times (e) for all of the tab lubricants plus the sum of (b) times (h) for all rust inhibitors plus the sum of (b) times (k) for all repair coatings);

o. the rolling, 12-month summation of individual HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

p. the rolling, 12-month summation of the total combined HAP usage from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (m) for the previous 12 calendar months);

q. the rolling, 12-month summation of the total VOC emissions from all tab lubricants, rust inhibitors, and repair coats employed, in pounds or tons per year (the sum of (n) for the previous 12 calendar months);

r. the rolling, 12-month summation of the gallons of tab lubricant employed (the sum of (e) for the previous 12 calendar months);

s. the rolling, 12-month summation of the gallons of rust inhibitor employed (the sum of (h) for the previous 12 calendar months); and

C. Monitoring and/or Record Keeping Requirements (continued)

t. the rolling, 12-month summation of the gallons of repair coat employed (the sum of (k) for the previous 12 calendar months).

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

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tab lubricant usage, the cumulative rust inhibitor usage and the cumulative repair coat usage for each calendar month.

4. The permit to install for emissions units (K015-K028, K030-K033 and K040-K044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK
TLV (mg/m3): 234
Maximum Hourly Emission Rate (lbs/hr): 7.11
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 2,001
MAGLC (ug/m3): 5,571

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing the use of noncomplying tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month in which the exceedance occurred.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. the average hourly mass emission limitation for VOC;

   b. the rolling, 12-month usage limitation of 588 gallons of tab lubricant and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tab lubricant usage levels;

   c. the rolling, 12-month usage limitation of 319 gallons of rust inhibitors and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative rust inhibitor usage levels;

   d. the rolling, 12-month usage limitation of 1,277 gallons of repair coat and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative repair coat usage levels; and

   e. the rolling, 12-month facility emission limitations for individual HAPs and combined HAPs; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and combined HAPs.

3. The permittee shall submit annual reports which specify the VOC material usage (includes tab lubricants, rust inhibitors, and repair coats), the VOC, total HAP, and individual HAP emissions, in tons, for K015-K028, K030-K033 and K040-K044. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify the Canton local air agency in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily combined usage limit for tab lubricants, rust inhibitors, and repair coats. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance.

E. Testing Requirements

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

a. Emissions Limitation:

The VOC content of the tab lubricant used shall not exceed 5.56 lbs/gal

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

b. Emissions Limitation:

The VOC content of the rust inhibitor used shall not exceed 3.59 lbs/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

c. Emissions Limitation:

The VOC content of the repair coat used shall not exceed 0.09 lb/gal.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.c.

d. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 0.78 lb/hr.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.e.

E. Testing Requirements (continued)

e. Emissions Limitation:

The combined annual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 24 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.p.

f. Emissions Limitation:

The annual individual hazardous air pollutant (HAP) emissions from the entire facility (K015-K028, K030-K033 and K040-K044) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.o.

g. Emissions Limitation:

Volatile organic compound emissions from this emissions unit shall not exceed 2.27 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.q.

E. Testing Requirements (continued)

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

a. Usage Restriction:

The maximum annual amount of tab lubricant used shall not exceed 588 gallons, based upon a rolling, 12-month summation of the amount of tab lubricant used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.r.

b. Usage Restriction:

The maximum annual amount of rust inhibitor used shall not exceed 319 gallons, based upon a rolling, 12-month summation of the amount of rust inhibitor used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.s.

c. Usage Restriction:

The maximum annual amount of repair coat used shall not exceed 1,277 gallons, based upon a rolling, 12-month summation of the amount of repair coat used.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.2.t.

d. Usage Restriction:

The maximum daily combined usage rate of tab lubricant, rust inhibitor, and repair coat for this emissions unit shall not exceed 10 gallons.

Applicable Compliance Method:

Compliance shall be achieved based on the monitoring and recordkeeping as specified in section C.1.f.

F. Miscellaneous Requirements

None