



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** **CERTIFIED MAIL**
SANDUSKY COUNTY
Application No: 03-09995
Fac ID: 0372030005

DATE: 4/21/2005

Rexam Beverage Can Company
Geoffrey Wortley
8770 W. Bryn Mawr Ave Suite 175
Chicago, IL 60631-3655

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 4/21/2005
Effective Date: 4/21/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-09995

Application Number: **03-09995**
APS Premise Number: **0372030005**
Permit Fee: **\$0**
Name of Facility: **Rexam Beverage Can Company**
Person to Contact: **Geoffrey Wortley**
Address: **8770 W. Bryn Mawr Ave Suite 175
Chicago, IL 606313655**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2145 Cedar Street
Fremont, OHIO**

Description of modification:

Administrative modification to PTI 03-09995 to correct facility name and to change the due date for quarterly report submittal from the 15th of each reporting month to the end of each month.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

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

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PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

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

Ohio
EPA
Source
Number

K001(m
odificati
on)

K002 (Modification)

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	<u>BAT</u> <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
K003 (Modific ation)	Source Identification <u>Description</u>			
	Two-piece aluminum beverage can line (Line #1)		Two-piece aluminum beverage can line (Line #2)	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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Two-piece aluminum beverage can line (Line #3)	<p style="text-align: center;"><u>BAT Determination</u></p> <p>Compliance with the terms and conditions of this permit.</p>	<p>Compliance with the terms and conditions of this permit.</p>		
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Compliance with the terms and conditions of this permit.	3745-31-05 3745-17-11 3745-17-07 3745-21-09 (D) 40 CFR Part 60 Subpart WW		3745-31-05 3745-17-11 3745-17-07 3745-21-09 (D) 40 CFR Part 60 Subpart WW	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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3745-31-05
3745-17-11
3745-17-07
3745-21-09
(D)
40 CFR
Part 60
Subpart
WW

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>	<u>Additional Special Terms and Conditions</u>	38.73 lbs VOC/hr (See Additional Special Terms and Conditions)	<u>Blanket Wash</u> 6.55 lbs VOC/gal; 0.4 tons/month
	<u>Particulate</u> .313 lb PM/hr from overspray, 0.025 lb PM/hr from oil mist, 0.0121 lb PM/hr from pin oven, 0.0346 lb PM/hr from IBO	<u>Blanket Wash</u> 6.55 lbs VOC/gal; 0.4 tons/month	<u>Particulate</u> .313 lb PM/hr from overspray, 0.025 lb PM/hr from oil mist, 0.0121 lb PM/hr from pin oven, 0.0346 lb PM/hr from IBO	<u>Overvarnish</u> 3.84 lbs VOC/gal coating solids; 2.8 lbs/gal of coating, excluding water and exempt solvents; 10.90 lbs VOC/hr (See Additional Special Terms and Conditions)
	<u>Opacity restriction (See Additional Special Terms and Conditions)</u>	<u>Bottom Varnish</u> 3.84 lbs VOC/gal coating solids; 2.8 lbs/gal of coating, excluding water and exempt solvents; 0.73 lb VOC/hr (See Additional Special Terms and Conditions)	<u>Opacity restriction (See Additional Special Terms and Conditions)</u>	<u>Bottom Varnish</u> 3.84 lbs VOC/gal coating solids; 2.8 lbs/gal of coating, excluding water and exempt solvents; 0.73 lb VOC/hr (See Additional Special Terms and Conditions)
	<u>VOC</u> 373 tons per rolling 12 month period (combined emissions from emissions units K001 through K003)	<u>Bottom Varnish</u> 3.84 lbs VOC/gal coating solids; 2.8 lbs/gal of coating, excluding water and exempt solvents; 0.73 lb VOC/hr (See Additional Special Terms and Conditions)	<u>VOC</u> 373 tons per rolling 12 month period (combined emissions from emissions units K001 through K003)	<u>Bottom Varnish</u> 3.84 lbs VOC/gal coating solids; 2.8 lbs/gal of coating, excluding water and exempt solvents; 0.73 lb VOC/hr (See Additional Special Terms and Conditions)
	<u>Inks</u> 0.20 lb VOC/lb of ink (average); 2.94 lbs VOC/hr (See	<u>Inside Spray</u> 7.43 lbs VOC/gal coating solids; 4.2 lbs/gal of coating, excluding water and exempt solvents;	<u>Inks</u> 0.20 lb VOC/lb of ink (average); 2.94 lbs VOC/hr (See Additional Special Terms and	<u>Inside Spray</u> 7.43 lbs VOC/gal coating solids; 4.2 lbs/gal of coating, excluding water and exempt solvents; 38.73 lbs VOC/hr (See Additional Special Terms and Conditions)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Particulate .313 lb PM/hr from overspray, 0.025 lb PM/hr from oil mist, 0.0121 lb PM/hr from pin oven, 0.0346 lb PM/hr from IBO Opacity restriction (See Additional Special Terms and Conditions) VOC 373 tons per rolling 12 month period (combin	ed emissions from emissions units K001 through K003) <u>Inks</u> 0.20 lb VOC/lb of ink (average); 2.94 lbs VOC/hr (See Additional Special Terms and Conditions) <u>Blanket Wash</u> 6.55 lbs VOC/gal; 0.4 tons/month <u>Overvarnish</u> 3.84 lbs VOC/gal coating solids; 2.8 lbs/gal of coating, excluding water and exempt solvents; 10.90 lbs VOC/hr (See Additional Special Terms and Conditions) <u>Bottom Varnish</u> 3.84 lbs VOC/gal coating solids; 2.8 lbs/gal of coating, excluding water and exempt solvents; 0.73 lb VOC/hr (See Additional Special Terms and	Conditions) <u>Inside Spray</u> 7.43 lbs VOC/gal coating solids; 4.2 lbs/gal of coating, excluding water and exempt solvents; 38.73 lbs VOC/hr (See Additional Special Terms and Conditions)		

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	5.04
VOC	373

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
K001, K002 and K003	2 piece aluminum beverage and can line 1, 2 and 3	WW

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

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Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and Northwest District Office
347 North Dunbridge Rd.
Bowling Green, Ohio 43402

RECORD(S) RETENTION AND AVAILABILITY

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

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

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

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Introduction:

Rexam Beverage Can Company has requested, through PTI # 03-9995, to increase VOC emissions at the Fremont facility by 124 TPY. The company will be modifying the VOC emissions limits on the three existing lines #1, #2, and #3, Ohio EPA emissions units K001 through K003 respectively.

B. Applicable Emission Limitations and/or Control Requirements:

1. VOC emissions from the individual coatings and cleanup materials employed in emissions units K001 through K003 shall not exceed the following levels:
 - a. Inside Spray Coat - 0.89 kg VOC/liter of coating solids (7.43 lbs/gal of coating solids) based on a volume-weighted calendar-month average, 4.2 lbs/gal of coating, excluding water and exempt solvents;

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- b. Overvarnish Coating - 0.46 kg VOC/liter of coating solids (3.84 lbs/gal of coating solids) based on a volume-weighted calendar-month average, 2.8 lbs/gal of coating, excluding water and exempt solvents;

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- c. Bottom Varnish Coating - 0.46 kg VOC/liter of coating solids (3.84 lbs/gal of coating solids) based on a volume-weighted calendar-month average, 2.8 lbs/gal of coating, excluding water and exempt solvents;
 - d. Inks - 0.20 lb VOC/lb of ink (average); and
 - e. Blanket Wash - 6.55 lbs VOC/gal.
2. VOC emissions from emissions units K001 through K003 shall not exceed the following levels:
- a. From inside spray coating operations - 38.73 lbs VOC/hr/emissions unit;
 - b. From overvarnish coating operations - 10.90 lbs VOC/hr/emissions unit,
 - c. From bottom varnish coating operations - 0.73 lb VOC/hr/emissions unit;
 - d. From the application of inks - 2.94 lbs VOC/hr/emissions unit;
 - e. From blanket wash (cleanup) usage - 0.4 tons VOC/month/emissions unit.
3. Total facility VOC emissions i.e., the combined VOC emissions from emissions units K001 through K003, shall not exceed 373 tons per rolling 12-month period. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (Tons)</u>
1	60
1-2	110
1-3	150
1-4	190
1-5	230
1-6	270
1-7	310
1-8	350

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1-9	373
1-10	373
1-11	373
1-12	373

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After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

4. Particulate matter (PM) emissions from emissions units K001-K003 each shall not exceed the following levels: 0.313 lb/hr/emissions unit from overspray, 0.025 lb/hr/emissions unit from oil mist, 0.0121 lb/hr/emissions unit from pin oven, and 0.0346 lb/hr/emissions unit from IBO.
5. Visible PM emissions from emissions units K001-K003 shall not exceed 5 percent opacity for the spray operations and 20 percent opacity from the ovens.

C. Operational Restrictions:

1. This permit allows for the use of the coatings (inside spray coat, overvarnish coat, exterior base coat, inks, and blanket wash) in emissions units K001 through K003 specified by the company in its PTI application number 03-9995. In conjunction with the BAT requirements of OAC 3745-31-05, the emission limits for each unit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating formulation data and the emissions unit's design parameters specified in the application. Any of the following changes may be deemed a "modification" to an emissions unit and, as such, prior notification to and approval from the Ohio EPA, Division of Air Pollution Control, Northwest District Office (NWDO) are required:
 - a. Any change in the composition of the coatings or use of new coatings that would result in the emissions of a more toxic compound than was previously emitted;
 - b. Any change in the composition of the coatings or use of new coatings that would result in the emissions of any organic compound excluded from the definition of "VOC" in OAC 3745-21-01 (B)(6);
 - c. Any change to an emissions unit or its exhaust characteristics that would result in an exceedance of the Maximum Acceptable Ground-Level Concentration (MAGLC) of air toxics beyond plant property lines; and
 - d. Any change to an emissions unit or its method of operation that would either require an increase in the emissions limitations established by this permit or would otherwise be considered a "modification" as defined in OAC 3745-31-01(J).
2. All coatings subject to OAC rule 3745-21-09 (D) employed in emissions units K001

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through K003 shall comply with the respective limit on an "as applied" basis.

D. Monitoring and/or Record Keeping Requirements:

1. Rexam Beverage Can Company shall collect and record, each month, the following information for each coating /cleanup material employed in emisissions units K001 through K003 and maintain the information at the facility for a period of five years:

For inside spray coatings

- a. \sum The name and identification number of each coating employed;
- b. The VOC content of each coating (excluding water and exempt solvents) as applied;
- c. The volume-weighted average of the total mass of VOC per volume of coating solids used during the calendar month calculated in accordance with the provisions of 40 CFR Part 60, Subpart WW, Section 60.493 (1);
- d. The volume, in gallons, of each coating employed;
- e. The amount of VOC emitted from each coating employed in lbs/month; and [b x d];
- f. The total amount of VOC emitted from all coatings employed in tons/month; [\sum e].

For overvarnish coatings

- g. The name and identification number of each coating employed;
- h. The VOC content of each coating (excluding water and exempt solvents), as applied;
- i. The volume-weighted average of the total mass of VOC per volume of coating solids used during the calendar month calculated in accordance with the provisions of 40 CFR Part 60, Subpart WW, Section 60.493 (1);
- j. The volume, in gallons, of each coating employed;
- k. The amount of VOC emitted from each coating employed in lbs/month; and [h x j];
- l. The total amount of VOC emitted from all coatings employed in tons/month; [\sum k].

For bottom varnish coatings

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- m. The name and identification number of each coating employed;
- n. The VOC content of each coating (excluding water and exempt solvents), as applied;
- o. The volume-weighted average of the total mass of VOC per volume of coating solids used during the calendar month calculated in accordance with the provisions of 40 CFR Part 60, Subpart WW, Section 60.493 (1);
- p. The volume, in gallons, of each coating employed;
- q. The amount of VOC emitted from each coating employed in lbs/month; and [h x j];
- r. The total amount of VOC emitted from all coatings employed in tons/month; [\sum q].

For inks

- s. The name and identification number of each ink employed;
- t. The amount of all inks employed in pounds per month;
- u. The average mass of VOC per mass of ink employed in pounds of VOC per pound of ink, as applied;
- v. The amount of VOC emitted from all inks in pounds per month; [u x t].

For blanket wash (cleanup)

- w. The name and identification number of each blanket wash employed;
- x. The mass of VOC per volume of each blanket wash, as applied;
- y. The volume, in gallons, of each blanket wash employed;
- z. The amount of VOC emitted from each blanket wash employed in lbs/month; [aa x ab]
- aa. The total amount of VOC emitted from all blanket washes employed in tons/month; [\sum ac].

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2. Rexam Beverage Can company shall collect and record, each month, the following information for all coatings, inks and cleanup materials employed in emisisions units K001 through K003 and maintain the information at the facility for a period of five years:

- a. The total amount of VOC emitted in tons/month;
- b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative VOC emissions for the period; and,
- g. Beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the amount of VOC emitted based upon a rolling 12-month summation.

E. Reporting Requirements:

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedance of emissions limitations specified in section B above. The reports shall also specify the total VOC emissions for the previous calendar quarter, as well as the maximum VOC contents of the inside spray coatings, bottom varnish coatings, overvarnish coatings, inks, and blanket washes employed for the period. The reports shall be submitted to Ohio EPA by January 31, April 30, July 31, and October 31 of each year and shall cover the pervious calendar quarter.

F. Testing Requirements/Compliance Method Determination:

1. Compliance Methods Requirements:

Compliance with the emission limitation (s) in Section B.1-5 of these terms and conditions shall be determined in accordance with the following method (s):

- a. Emission Limitation:

0.89 kg VOC/litter coating solids - inside spray coat
 0.46 kg VOC/litter coating solids - overvarnish coating

0.46 kg VOC/litter coating solids - bottom varnish coating
 0.20 lb VOC/lb ink (average)
 6.55 lbs VOC/gal - blanket wash

Applicable Compliance Method:

Any determination of VOC content *, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the

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coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

*Note: "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

b. Emission Limitation:

4.2 lbs VOC/gal of coating, excluding water and exempt solvents - inside spray coat
 2.8 lbs VOC/gal of coating, excluding water and exempt solvents - overvarnish
 2.8 lbs VOC/gal of coating, excluding water and exempt solvents - bottom varnish coating

Applicable Compliance Method:

Any determination of VOC content *, solids content, or density of a coating shall be based on the coating as employed (as applied), including the addition of any thinner or viscosity reducer to the coating. The company shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings by Reference Method 24 or an equivalent or alternative method.

*Note: "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon excluding water and exempt solvents.

c. Emission Limitation:

38.73 lbs VOC/hr/emissions unit* - inside spray coating operation
 10.90 lbs VOC/hr/emissions unit* - overvarnish coating
 0.73 lb VOC/hr/emissions unit* - bottom varnish coating
 2.94 lbs VOC/hr/emissions unit* - inks
 0.4 tons VOC/month/emissions unit (cleanup)

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Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section D above.

*Note: This hourly limit represents the units "maximum capacity" i.e., its potential to emit based on a maximum hourly coating application rate and a maximum coating VOC content. Although this permit does not require periodic recordkeeping to verify compliance with this limit, the permittee shall maintain adequate records in the facility's files to verify that the emissions units' maximum capacity has not be increased.

d. Emission Limitation:

373 tons VOC per rolling 12 month period

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section D above.

e. Emission Limitation:

0.313 lb PM/hr/emissions unit from overspray

Applicable Compliance Method:

Compliance with the PM emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10). In the absence of the Ohio EPA requiring such testing, the permittee may calculate the actual emissions rate utilizing the following equation:

$$E = \text{maximum coating solids usage rate} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

f. Emission Limitation:

0.025 lb PM/hr/emissions unit from oil mist.

Applicable Compliance Method:

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Compliance with the PM emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10). In the absence of the Ohio EPA requiring such testing, the permittee may calculate the actual emissions rate utilizing the following equation:

$$E = \text{gallons of oil} \times 0.03 \text{ lbs/gal}$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

g. Emission Limitation:

0.0121 lb PM/hr/emissions unit from pin oven
 0.0346 lb PM/hr/emissions unit from IBO

Applicable Compliance Method:

Compliance with the PM emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10). In the absence of the Ohio EPA requiring such testing, the permittee may calculate the actual emissions rate utilizing the following equation:

$$\text{Pin Oven} = \text{hourly gas usage (scf/hr)} \times 12 \text{ lbs/MMcf (AP42 Table 1.4-1)}$$

$$\text{IBO} = \text{hourly gas usage (scf/hr)} \times 12 \text{ lbs/MMcf (AP42 Table 1.4-1)}$$

h. Emission Limitation:

5 percent opacity for spray operations and 20 percent opacity for ovens

Applicable Compliance Method:

Compliance with the visible emissions limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(1).

G. Miscellaneous Requirements:

None