State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
LUCAS COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 04-01473
Fac ID: 0448002007
DATE: 8/2/2007

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

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

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

You are hereby notified that this action 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA **TDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

FINAL PERMIT TO INSTALL 04-01473

Application Number:	04-01473
Facility ID:	0448002007
Permit Fee:	**$200**
Name of Facility:	Rexam Beverage Can Company
Person to Contact:	Geoffrey Wortley
Address:	8770 West Bryn Mawr Ave Suite 175 Chicago, IL 60631-3655

Location of proposed air contaminant source(s) [emissions unit(s)]:
10444 Waterville Swanton Road
Whitehouse, **Ohio**

Description of proposed emissions unit(s):
New Beverage Can Manufacturing Line 4 making SLEEK Cans.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

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

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

a. 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit 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.

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
HAPs	9.9 single, 24.9 combined facility-wide
CO	4.82
NOx	5.75
PE	0.86
PM10	1.10
SO2	0.20
VOC	43.17

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Emissions Unit ID: K012

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K012) - Beverage Can Coating Line 4 - comprised of a washer oven; continuous motion basecoater with oven; continuous motion printer with oven; interior body sprayer with oven; all (except the washer oven) controlled with a regenerative thermal oxidizer (RTO)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	Volatile Organic Compound (VOC) emissions shall not exceed 43.17 tons per rolling, 12-month period. See Sections A.I.2.b and A.II.3.
OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 12.87 pounds per hour. See Sections A.I.2.a, A.I.2.c, and A.I.2.d.
ORC 3704.03(T)(4)	See Section A.I.2.e.
OAC rule 3745-17-07(A)(1)	Visible emissions from stacks this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.551 pound per hour. See Section A.I.2.f.
OAC rule 3745-18-06(A)	See Section A.I.2.g.
40 CFR Part 60, Subpart WW	See Section A.I.2.h and A.I.2.i.
OAC rule 3745-21-08(B)	See Section A.I.2.j.
OAC rule 3745-21-09(D)(1)	See Section A.I.2.h.

Emissions Unit ID: K012

2. Additional Terms and Conditions

2.a For the regenerative thermal oxidizer (RTO), the capture efficiency shall be a minimum of 72% and the destructive efficiency shall be a minimum of 95% for VOC emissions from the coatings, inks and cleanup materials.

2.b The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

2.c The hourly and annual emission limitation for the bake ovens were established for PTI purposes to reflect the potential to emit for the combustion of natural gas in this emissions unit at the maximum burner heat input capacity of 1.925 mmBtu for the washer oven, 3.0 mmBtu per hour for the continuous motion base coat oven, 2.75 mmBtu per hour for the continuous motion printer oven, and 5.70 mmBtu per hour for the inside spray oven. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with these limitations.

2.d Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:

inks:	1.81 pounds per gallon of coating excluding water and exempt solvents;
basecoat:	1.8 pounds per gallon of coating excluding water and exempt solvents;
basecoat:	2.4 pounds per gallon of coating solids;
over varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
over varnish:	2.9 pounds per gallon of coating solids;
exterior bottom end varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
exterior bottom end varnish:	2.9 pounds per gallon of coating solids;
inside spray:	3.5 pounds per gallon of coating excluding water and exempt solvents;
inside spray:	6.8 pounds per gallon of coating solids; and
clean-up solvent:	6.55 pounds of VOC per gallon.

2.e The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO2, NOx, PE, PM10, and CO emissions from this air contaminant source since the uncontrolled potential to emit for SO2, NOx, PE, PM10 and CO is less than 10 tons per year.

2.f The inside body coating is the only coating sprayed and therefore is the only coating producing particulate emissions.

2.g OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

2.h The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).

2.i This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

2.j The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by the design of the emissions unit and the technology associated with the current operating practices.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall burn only natural gas in the 1.925 mmBtu per hour washer oven, 3.0 mmBtu per hour continuous motion base coater oven, 2.75 mmBtu per hour continuous motion printer oven, and 5.70 mmBtu per hour interior body coating oven emissions units.

2. The individual HAP and total HAP, combined, emission rates for all emissions units at the facility shall not exceed 9.9 and 24.9 tons per year, respectively, based upon a rolling, 12-month summation of emission rates. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, actual emissions

calculated from material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions from this facility.

3. Coating and clean-up material usage in this emissions unit shall not exceed the following levels based upon a rolling, 12-month summation of the usage rates:

Base coat: 35,597 gallons per rolling 12-month period;
Over varnish: 64,335 gallons per rolling 12-month period;
Bottom varnish: 2,885 gallons per rolling 12-month period;
Inside spray: 124,021 gallons per rolling 12-month period;
Inks: 4,363 gallons per rolling 12-month period; and
Clean-up solvent: 634 gallons per rolling 12-month period.

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

Maximum Allowable Cumulative Gallons

Month	Base Coat Gallons	Over Varnish gallons	Bottom Varnish gallons	Inside Spray gallons	Inks gallons	Clean-Up Solvent gallons
1	2,970	5,370	241	10,335	364	53
1-2	5,940	10,740	482	20,670	728	106
1-3	8,910	16,110	723	31,005	1,092	159
1-4	11,880	21,480	964	41,340	1,456	212
1-5	14,850	26,850	1,205	51,675	1,820	265
1-6	17,820	32,220	1,446	62,010	2,184	318
1-7	20,790	37,590	1,687	72,345	2,548	371
1-8	23,760	42,960	1,928	82,680	2,912	424
1-9	26,730	48,330	2,169	93,015	3,276	477
1-10	29,700	53,700	2,410	103,350	3,640	530
1-11	32,670	59,070	2,651	113,685	4,004	583
1-12	35,597	64,335	2,885	124,021	4,363	634

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

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas in the washer oven, basecoater oven, printer oven, the interior body coating oven, or the RTO, the permittee shall maintain a record of the type and quantity of fuel burned in the respective oven.

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

   a. i. the name and identification number of each coating (i.e., over varnish, bottom varnish, inside spray coating, or basecoat coating), as applied;
      ii. the volume of each coating employed, in gallons;
      iii. the VOC content of each coating, in pounds of VOC per gallon of coating;
      iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents;
      v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied,
      vi. the monthly total VOC emissions from all coatings employed, [(ii) x (iii) x (1-CE)] ÷ 2000, in tons; (CE = overall percentage control efficiency of the RTO as determined during the most recent emissions test that demonstrated compliance. Prior to the initial compliance test of the RTO, the permittee shall use the estimated overall percentage control based on testing of a similar source ((72%)(95%))=0.684).

   b. i. the name and identification number of each ink, as applied;
      ii. the volume (or mass) of each ink employed, in gallons (or pounds);
      iii. the VOC content of each ink, in pounds of VOC per gallon (or pounds) of ink;
      iv. the VOC content of each ink, in pounds of VOC per gallon of ink excluding water and exempt solvents;
      v. the monthly total VOC emissions from all inks employed, calculated on a volume (or mass) basis, [(ii) x (iii) x (1-CE)] ÷ 2000, in tons;(CE = overall percentage control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance. Prior to the initial compliance test of the RTO, the permittee shall use the estimated overall percentage control based on testing of a similar source ((72%)(95%))=0.684).

   c. i. the name and identification number of each clean-up material employed,
      ii. the volume of each clean-up material employed, in gallons,
      iii. the VOC content of each clean-up material employed, in pounds of VOC per gallon,
      iv. the monthly total VOC emissions from all clean-up materials employed, (ii) x (iii) ÷ 2000, in tons;

   d. beginning after the first 12 calendar months of operation following issuance of

this permit, the rolling 12-month summation of VOC emissions from all coatings, inks and clean-up materials employed, in tons. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC emissions from all coatings, inks and clean-up materials employed for each calendar month.

e. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation, of each type of coating employed in gallons. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative coating usage rates for each calendar month.

f. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation, of each type of ink employed in gallons (or pounds). Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative ink usage rates for each calendar month.

g. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation, of each type of clean-up solvent employed, in gallons. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative clean-up solvent usage rates for each calendar month.

3. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during

the most recent emissions test that demonstrated the emissions unit to be in compliance;

b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit;

c. whenever the monitored value for the combustion temperature deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations; and

d. in response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable combustion temperature specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time of the deviation, the total period of time during which there was a deviation, the combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the

observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

5. The permittee shall collect and record the following information each month for the line:

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

   b. the total HAP content of each coating, and cleanup material, in pounds per gallon;

   c. the individual HAP content of each coating, and cleanup material, in pounds per gallon;

   d. the number of gallons of each coating, and cleanup material employed;

   e. the total HAP emissions (HAP applied) from all coatings and cleanup materials employed, in tons;

   f. the individual HAP emissions (HAP applied) from all coatings and cleanup materials employed, in tons;

   g. the rolling, 12-month summation of total HAP emissions, in tons, and

   h. the rolling, 12-month summation of individual HAP emissions, in tons.

6. The permittee shall maintain records of the facility's 12 month rolling total emissions of each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures, and assumptions supporting the calculations.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in any oven or the RTO comprising this

emission unit, as fuel. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.

2. The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.

3. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. If no visible emissions observed, submit a report which states no visible emissions occurred during that period. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section A.1.

4. The permittee shall submit quarterly deviation (excursion) reports that identify:

   a. all exceedances of the rolling, 12-month usage rate limitations for coatings specified under A.II.3;

   b. all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels; and

   c. all exceedances of the rolling, 12-month emission limitations for individual HAP or any combination of HAPs.

   These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

5. The permittee shall submit quarterly reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:

   a. each period of time when the combustion temperature was outside the acceptable range;

   b. an identification of each incident of deviation described in (a.) where a prompt investigation was not conducted;

   c. an identification of each incident of deviation described in (a.) where prompt corrective action, that would bring the temperature into compliance with the

acceptable range, was determined to be necessary and was not taken; and

d. and identification of each incident of deviation described in (a.) where proper records were not maintained for the investigation and/or the corrective action.

V. Testing Requirements

1. Compliance with the Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions for all emissions units at the facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

Applicable Compliance Method:

The monitoring and record keeping requirements of Section III will be used to demonstrate compliance.

b. Emission Limitation:

43.17 tons of VOC per rolling,12-month period for Line 4.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings and clean-up materials. Compliance with this emission limitation will be demonstrated by the monitoring and record keeping requirements of Section III.2 and the emissions of natural gas from the ovens based on maximum hourly usage, 8760 hours per year and AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

c. Emission Limitation:

12.87 pounds of VOC per hour.

Applicable Compliance Method:

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings and clean-up materials:

Sum of [Gallons of coating applied per hour*weight % of solvent*density of coating*(1-CE)] + sum of [(fuel usage rating*5.5 lb/mmscf*(1-CE))/1020 mmBtu/mmscf]

CE = overall percentage control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance. Prior to the initial compliance test of the RTO, the permittee shall use the estimated overall percentage control based on testing of a similar source ((72%)(95%))=0.684

d. Emission limitation:

1.8 pounds of VOC per gallon of coating (minus water and exempt solvents) for the continuous motion base coat coating line.

Applicable Compliance Method:

The monitoring and record keeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a

particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission limitation:

2.40 pound of VOC per gallon of coating solids for the continuous motion base coat coating line.

Applicable Compliance Method:

The monitoring and record keeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Emission Limitation:

4.82 tons per year for CO emissions from line 4 (i.e. the washer oven, the continuous motion base coater oven, the continuous motion printer oven, and the inside bake oven).

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner heat input capacity (1.925 mmBtu/hr + 3.00 mmBtu/hr + 2.75 mmBtu/hr + 5.70 mmBtu/hr = 13.375 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98. The resulting value shall be multiplied by 8760 hours per year and divided by 2000 pounds per ton.

Emissions Unit ID: K012

If required, the permittee shall demonstrate compliance with this emission factor through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g. Emission Limitation:

5.75 tons per year for NO_x emissions from line 4 (ie. the washer oven, the continuous motion base coater oven, the continuous motion printer oven, and the inside bake oven).

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner heat input capacity (1.925 mmBtu/hr + 3.00 mmBtu/hr + 2.75 mmBtu/hr + 5.70 mmBtu/hr = 13.375 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98. The resulting value shall be multiplied by 8760 hours per year and divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with this emission factor through emission testing performed in accordance with Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

h. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specificied in OAC rule 3745-17-03(B)(1).

i. Emission Limitation:

0.86 tons per year for PE emissions from line 4 (ie. the washer oven, the continuous motion base coater oven, the continuous motion printer oven, and the inside bake oven).

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner heat input

capacity (1.925 mmBtu/hr + 3.00 mmBtu/hr + 2.75 mmBtu/hr + 5.70 mmBtu/hr = 13.375 mmBtu/hr) by an emission factor of 1.9 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98. The resulting value shall be multiplied by 8760 hours per year and divided by 2000 pounds per ton.

To this amount shall be added the emissions from the inside spray operation. Annual allowable emissions are based on the hourly allowable emission rate (0.551 pound per hour) multiplied by the maximum annual operating hours (8760 hours per year), divided by 2000 pounds/ton.

If required, the permittee shall demonstrate compliance using Methods 1 thru 5 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

j. Emission Limitation:

1.10 tons per year for PM_{10} emissions from line 4 (ie. the washer oven, the continuous motion base coater oven, the continuous motion printer oven, and the inside bake oven).

Applicable Compliance Method:

This emission limitation was developed based on a one-time calculation as follows: multiplying the maximum burner heat input capacity (1.925 mmBtu/hr + 3.00 mmBtu/hr + 2.75 mmBtu/hr + 5.70 mmBtu/hr = 13.375 mmBtu/hr) by an emission factor of 7.6 pounds of PM_{10} per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98. The resulting value shall be multiplied by 8760 hours per year and divided by 2000 pounds per ton.

To this amount shall be added the emissions from the inside spray operation. This is based on the volume of coating (124,021 gal/yr) multiplied by the density (8.43 lb/gal), the solids content (0.144 lb PE/lb coating), and the particulate emission factor (0.006 lb/lb), then divided by 2000 lb/ton.

If required, the permittee shall demonstrate compliance with this emission factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

k. Emission Limitation:

0.20 tons per year for SO_2 emissions from line 4 (ie. the washer oven, the continuous motion base coater oven, the continuous motion printer oven, and the inside bake oven).

Applicable Compliance Method

This emission limitation was developed based on a one-time calculation as follows: multiplying the maximum burner heat input capacity (1.925 mmBtu/hr + 3.00 mmBtu/hr + 2.75 mmBtu/hr + 5.70 mmBtu/hr = 13.375 mmBtu/hr) by an emission factor of 0.6 pound of SO_2 per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98. The resulting value shall be multiplied by 8760 hours per year and divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with this emission factor through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

l. Emission Limitation:

2.1 pounds of VOC per gallon of coating (excluding water and exempt solvents) for over varnish and exterior bottom end varnish**.**

Applicable Compliance Method:

The monitoring and record keeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

m. Emission Limitation:

2.9 pounds of VOC per gallon of coating solids for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

n. Emission limitation:

1.81 pounds of VOC per gallon of coating (excluding water and exempt solvents) for inks.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

o. Emission Limitation:

3.5 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the interior body coating line, line 4 can body sprayers.

Applicable Compliance Method:

The monitoring and record keeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

p. Emission Limitation:

6.8 pounds of VOC per gallon of coating solids for the Interior Body Coating, line 4 can body sprayers.

Applicable Compliance Method:

The monitoring and record keeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B)and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be based upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

q. Emission limitation:

clean-up solvent: 6.55 pounds of VOC per gallon.

Applicable Compliance Method:

The permittee shall determine the VOC-content of the clean-up solvent from manufacturer's formulation data.

r. Emission Limitation:

0.551 pound per hour PE from the inside body spray

Applicable Compliance Method:

This emission limitation was developed based on a one-time calculation as follows: multiplying the maximum coating usage (18.39 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and 1-(transfer efficiency) multiplied by 1-(control efficiency) ((1-0.94)(1-.090)=0.006).

If required, the permittee shall demonstrate compliance using Methods 1 thru 5 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup.

ii. The emission testing shall be conducted to demonstrate compliance with the overall capture and control efficiency limitation for VOC.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 US EPA'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 (destruction) 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 Method 25 or 25A of 40 CFR Part 60 Appendix A, as appropriate, using the methods and procedures specified in OAC rule 3745-21-10(C) or an alternative test protocol approved by the Ohio EPA. 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.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. 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 appropriate Ohio EPA District Office or local air agency.

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services' refusal to accept the results of the emission test(s).

vi. Personnel from Toledo Division of Environmental Services 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.

vii. 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 Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

VI. Miscellaneous Requirements

None

Issued: 8/2/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K012) - Beverage Can Coating Line 4 - comprised of a washer oven; continuous motion basecoater with oven; continuous motion printer with oven; interior body sprayer with oven; all (except the washer oven) with the ability to be controlled with a regenerative thermal oxidizer (RTO)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

Issued: 8/2/2007

None

Emissions Unit ID: K012

NEW SOURCE REVIEW FORM B

PTI Number: 04-01473 Facility ID: 0448002007

FACILITY NAME Rexam Beverage Can Company

FACILITY DESCRIPTION New Beverage Can Manufacturing Line 4 making SLEEK Cans CITY/TWP Whitehouse

SIC CODE 3411 SCC CODE 40201735 EMISSIONS UNIT ID K012

EMISSIONS UNIT DESCRIPTION Beverage Can Coating Line 4 - comprised of a continuous motion base coater with oven; continuous motion printer with oven; interior body sprayer with oven; all to be controlled with a regenerative thermal oxidizer (RTO)

DATE INSTALLED TBD

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.23 lb/hr	0.77	0.551 lb/hr	
PM_{10}	Unclassified	0.29 lb/hr	1.10		< 10.0
Sulfur Dioxide	Attainment	0.01 lb/hr	0.04		< 10.0
Organic Compounds	Non-Attainment	12.87 lb/hr	43.17	12.87 lb/hr	43.24
Nitrogen Oxides	Unclassified/attainment	1.31 lb/hr	5.75		< 10.0
Carbon Monoxide	Unclassified/attainment	1.11 lb/hr	4.82		< 10.0
Lead					
Other: Air Toxics	HAPs				9.9 individual 24.9 combined

APPLICABLE FEDERAL RULES:

NSPS? WW NESHAP? NO PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Low VOC coatings

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____