

Facility ID: 0387040189 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at the facility:

- G002 - Diesel fuel dispensing
- L001 - Parts washer #1
- L002 - Parts washer #2
- L003 - Parts washer #3
- L004 - Parts washer #4
- L005 - Parts washer #5
- T001 - Compound Tank
- Z006 - Parts washer #6
- Z002 - Parts washer #7
- Z004 - Ink Dot Applicators
- Z005 - Video jet applicators
- Z006 - 7.4 mmBtu/hr natural gas fired boiler
- Z007 - 7.4 mmBtu/hr natural gas fired boiler

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations as well as any emission limitations and/or control requirements contained within a PTI for the emissions unit.

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- [Go to Part III for Emissions Unit K002](#)
- [Go to Part III for Emissions Unit K004](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387040189 Emissions Unit ID: K001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sheet coater #1 (basecoat coating line) equipped with a thermal incinerator	OAC rule 3745-21-09 (B)(6)	See A.I.2.a.
2. Additional Terms and Conditions		
a. In lieu of complying with the pounds of volatile organic compounds (VOC)/gallon of solids requirement in OAC Rule 3745-21-09 (D)(2)(a), the permittee shall comply with the following control limitations:		
(a)		
i. The capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions vented to the control equipment (thermal incinerator).		
ii. The thermal incinerator shall maintain a minimum VOC destruction efficiency of 90%, by weight.		

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II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall 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 monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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V. Testing Requirements

1. The permittee shall conduct or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall VOC control efficiency requirement of 81% and the minimum destruction efficiency requirement of 90%.
 - c. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC Rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387040189 Emissions Unit ID: K001 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387040189 Emissions Unit ID: K002 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sheet coater #2 (basecoat coating line) equipped with a thermal incinerator	OAC rule 3745-21-09 (B)(6)	See A.I.2.a.
2. Additional Terms and Conditions		
a. In lieu of complying with the pounds of volatile organic compounds (VOC)/gallon of solids requirement in OAC Rule 3745-21-09 (D)(2)(a), the permittee shall comply with the following control limitations:		
(a)		
i. The capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions vented to the control equipment (thermal incinerator).		
ii. The thermal incinerator shall maintain a minimum VOC destruction efficiency of 90%, by weight.		

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II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall 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 monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
- b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in

operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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V. **Testing Requirements**

1. The permittee shall conduct or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall VOC control efficiency requirement of 81% and the minimum destruction efficiency requirement of 90%.
 - c. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC Rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387040189 Emissions Unit ID: K002 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

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V. **Testing Requirements**

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387040189 Emissions Unit ID: K004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece can interior body spray w/ oven (spray clad line)	OAC rule 3745-21-09 (D)(2)(c)	4.2 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

OAC rule 3745-17-11 (B)(2) 0.551 lb particulate emissions (PE)/hr
 OAC rule 3745-17-07(A) 20% opacity, as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC Rule 3745-21-09 (D)(2)(c) on an "as applied" basis.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
- The name and identification number of each coating, as applied.
 - The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.
3. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from 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:
- the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
- Emission Limitation:
4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III. of this permit.

Any determination of the VOC content*, solids content, or density of a coating shall be based on the coating as applied, including the addition of any thinner or viscosity reducer to the coating. The permittee

shall determine the composition of the coating by formulation data supplied by the manufacturer of the coating, or from data determined by an analysis of each coating, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating by Reference Method 24 or an equivalent or alternative method.

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

- b. Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation may be used for the paint spraying operations:

$E = PE \text{ rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387040189 Emissions Unit ID: K009 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
can assembly line # 4 (three-piece can assembly line w/side seam stripe)	OAC rule 3745-21-09 (D)(2)(d) OAC rule 3745-17-11 (B)(2) OAC rule 3745-17-07(A)	5.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents 0.551 lb particulate emissions (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

- 1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC Rule 3745-21-09 (D)(2)(d) on an "as applied" basis.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.
3. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from 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 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 eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III. of this permit.

Any determination of the VOC content*, solids content, or density of a coating shall be based on the coating as applied, including the addition of any thinner or viscosity reducer to the coating. The permittee shall determine the composition of the coating by formulation data supplied by the manufacturer of the coating, or from data determined by an analysis of each coating, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating expressed as pounds of VOC per gallon.
 - b. Emission Limitation:

0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation may be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

E = maximum coating solids usage rate, in pounds per hour X (1-TE) X (1-CE)

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above, pursuant to OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:
20% opacity, except as provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation above in accordance with OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K009 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387040189 Emissions Unit ID: K010 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line w/ side-seam stripe; line #5	OAC rule 3745-31-05 (PTI #03-8882)	6.8 tons VOC/year, based upon a rolling, 12-month summation, from the application of side-seam coatings and all cleanup materials
	OAC rule 3745-21-09 (D)(2)(d)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(D)(2)(d), 3745-17-11(B) and 3745-17-07(a).
	OAC rule 3745-17-11 (B)(2)	5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-07 (A)	0.551 lb particulate emissions (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.
- 2. The maximum annual side-seam coating usage for this emissions unit shall not exceed 2,443 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all coatings used.
- 3. The maximum annual cleanup material usage for this emissions unit shall not exceed 15 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all cleanup materials used.

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and

exempt solvents, as applied.

- c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all the side-seam coatings and cleanup materials employed [summation of (b X e) for all side-seam coatings + summation of (c X d) for all cleanup materials], in tons.
 - g. The total number of gallons of all the side-seam coatings employed.
 - h. The total number of gallons of all the cleanup materials employed.
 - i. The rolling, 12-month summation of all the side-seam coatings employed, in gallons.
 - j. The rolling, 12-month summation of all the cleanup materials employed, in gallons.
 - k. The rolling, 12-month summation of the VOC emissions from all the side-seam coatings and cleanup materials, in tons.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from 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 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 eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month side-seam coating usage restriction of 2,443 gallons, the rolling, 12-month cleanup material usage restriction of 15 gallons, and the rolling, 12-month VOC emission limitation of 6.8 tons. These reports shall be submitted in accordance with section A.1.c of the permit's General Terms and Conditions.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

- a. Emission Limitation:
 1. 5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to demonstrate compliance with the VOC content limitation above.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

0.551 lb/hr PE

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

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 (60%, from 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to the methods in OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with OAC rule 3745-17-03(B)(1).

- d. Emission Limitation:
6.8 tons VOC/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K010 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line w/ side seam stripe; line #5	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (K010) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde
 TLV microgram/cubic meter (ug/m³): 370
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 6.8
 MAGLC (ug/m³): 8.8

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

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

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387040189 Emissions Unit ID: K015 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
food can end press line #6 w/ compound applicators	OAC rule 3745-21-09 (D)(2)(e)	3.7 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
2. Additional Terms and Conditions		
(a) None		

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II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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V. Testing Requirements

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

Emission Limitation:
3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

Any determination of the VOC content*, solids content, or density of a coating shall be based on the coating as applied, including the addition of any thinner or viscosity reducer to the coating and cleanup material. The permittee shall determine the composition of the coating by formulation data supplied by the manufacturer of the coating, or from data determined by an analysis of each coating, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating by Reference Method 24 or an equivalent or alternative method.

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

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K015 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387040189 Emissions Unit ID: K016 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
food can end press line #7 w/ compound applicators	OAC rule 3745-21-09 (D)(2)(e)	3.7 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
2. Additional Terms and Conditions		
(a) None		

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II. **Operational Restrictions**

- 1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
- 2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

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IV. **Reporting Requirements**

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the

appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

Any determination of the VOC content*, solids content, or density of a coating shall be based on the coating as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating by formulation data supplied by the manufacturer of the coating, or from data determined by an analysis of each coating, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating by Reference Method 24 or an equivalent or alternative method.

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387040189 Emissions Unit ID: K016 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K017 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece food can end press # 8 w/ compound applicators	OAC Rule 3745-31-05 (PTI #03-11340)	10.73 lbs volatile organic compounds (VOC)/hr, from the application of end sealing compound coatings (See A.1.2.b.)
		1168 lbs VOC/month, from the application of cleanup materials
		See A.1.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC 3745-21-09(D)(2)(e)	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents, from the application of end sealing compound coatings

2. Additional Terms and Conditions

- a. The VOC emissions from this emissions unit shall not exceed 27.73 TPY (from the coating and cleanup material usage), based upon a rolling, 12-month summation of the monthly VOC input rates.
- b. The 10.73 pounds/hour VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.

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II. **Operational Restrictions**

- 1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content

limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The number of gallons of each coating employed, excluding water and exempt solvents, as applied.
 - c. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.
 - d. The VOC emissions from each coating employed (b x c), in pounds.
 - e. The total VOC emissions from all the coatings employed (summation of d for all coatings), in pounds.
 - f. The name and identification number of each cleanup material employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The VOC content of each cleanup material employed, in pounds/gallon.
 - i. The VOC emissions from each cleanup material employed (g x h), in pounds.
 - j. The total VOC emissions from all the cleanup materials employed (summation of i for all cleanup materials), in pounds.
 - k. The total VOC emissions from all the coatings and cleanup materials employed (j + e), in pounds.
 - l. The rolling 12-month VOC emission rate from all the coatings and cleanup materials employed, in tons.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports of all exceedances of the rolling, 12-month VOC emission limitation (from all coatings and cleanup materials) of 27.73 tons, and the monthly VOC emission limitation (from cleanup materials) of 1,168 pounds. These reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method (s):
 - a. Emission Limitation:
10.73 lbs VOC/hour, from all coatings

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above by multiplying the maximum coating usage rate (gallon/hour) by the maximum VOC content of all the coatings employed (lbs VOC/gallon of coating).
 - b. Emission Limitation:
3.7 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as

pounds of VOC per gallon.

- c. Emission Limitations:
27.73 TPY, based up on a rolling, 12-month summation of the monthly VOC emission rates, from all coatings and cleanup materials

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

- d. Emission Limitation:
1168 lbs VOC/month, from all cleanup materials

Applicable Compliance Method:
The permittee shall demonstrate compliance with the monthly allowable VOC emission limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K017 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece food can end press # 8 w/ compound applicators	none	none

- 2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit (K017) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane
 TLV microgram/cubic meter (ug/m³): 176,000
 Maximum Hourly Emission Rate (lbs/hr): 31.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1654
 MAGLC (ug/m³): 4190

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387040189 Emissions Unit ID: K018 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece food can end press # 9 w/ compound applicators	OAC Rule 3745-31-05 (PTI #03-11340)	9.62 lbs volatile organic compounds (VOC)/hr, from the application of end sealing compound coatings (See A.1.2.b)
		1168 lbs VOC/month, from the application of cleanup materials
		See A.1.2.a.
	OAC 3745-21-09(D)(2)(e)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
		3.7 lbs VOC/gallon of coating, excluding water and exempt solvents, from the application of end sealing compound coatings

2. Additional Terms and Conditions

- a. The VOC emissions from this emissions unit shall not exceed 28.72 TPY (from the coating and cleanup material usage), based upon a rolling, 12-month summation of the monthly VOC input rates.
- b. The 9.62 pounds/hour VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.

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II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The number of gallons of each coating employed excluding water and exempt solvents, as applied.
 - c. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.
 - d. The VOC emissions from each coating employed (b x c), in pounds.
 - e. The total VOC emissions from all the coatings employed (summation of d for all coatings), in pounds.
 - f. The name and identification number of each cleanup material employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The VOC content of each cleanup material employed, in pounds/gallon.
 - i. The VOC emissions from each cleanup material employed (g x h), in pounds.
 - j. The total VOC emissions from all the cleanup materials employed (summation of i for all cleanup materials), in pounds.
 - k. The total VOC emissions from all the coatings and cleanup materials employed (j + e), in pounds.
 - l. The rolling 12-month VOC emission rate from all the coatings and cleanup materials employed in tons.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar

month.

2. The permittee shall submit quarterly deviation (excursion) reports of all exceedances of the rolling, 12-month VOC emission limitation (from all coatings and cleanup materials) of 27.73 tons, and the monthly VOC emission limitation (from cleanup materials) of 1,168 pounds. These reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method (s):
 - a. Emission Limitation:
9.62 lbs VOC/hour, from all coatings

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above by multiplying the maximum coating usage rate (gallon/hour) by the maximum VOC content of all the coatings employed (lbs VOC/gallon of coating).
 - b. Emission Limitation:
3.7 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
 - c. Emission Limitations:
28.72 TPY, based up on a rolling, 12-month summation of the monthly VOC emission rates from all coatings and cleanup materials

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based upon the record keeping requirements in Section A.III.1 of this permit.
 - d. Emission Limitation:
1168 lbs VOC/month, from all cleanup materials

Applicable Compliance Method:
The permittee shall demonstrate compliance with the monthly allowable VOC emission limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387040189 Emissions Unit ID: K018 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece food can end press # 9 w/ compound applicators	none	none

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (K018) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane
 TLV microgram/cubic meter (ug/m³): 176,000
 Maximum Hourly Emission Rate (lbs/hr): 31.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1654
 MAGLC (ug/m³): 4190

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

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K019 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece food can end press # 10 w/ compound applicators	OAC rule 3745-31-05 (PTI #03-11340)	10.73 lbs volatile organic compounds (VOC)/hr, from the application of end sealing compound coatings (See A.I.2.b)
		1168 lbs VOC/month, from the application of cleanup materials
		See A.I.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-21-09(D)(2)(e)	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents, from the application of end sealing compound coatings

2. **Additional Terms and Conditions**

- a. The VOC emissions from this emissions unit shall not exceed 35.92 TPY (from the coating and cleanup material usage), based upon a rolling, 12-month summation of the monthly VOC input rates.
- b. The 10.73 pounds/hour VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.

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II. **Operational Restrictions**

- 1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The number of gallons of each coating employed excluding water and exempt solvents, as applied.
 - c. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.
 - d. The VOC emissions from each coating employed (b x c), in pounds.
 - e. The total VOC emissions from all the coatings employed (summation of d for all coatings), in pounds.
 - f. The name and identification number of each cleanup material employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The VOC content of each cleanup material employed, in pounds/gallon.
 - i. The VOC emissions from each cleanup material employed (g x h), in pounds.
 - j. The total VOC emissions from all the cleanup materials employed (summation of i for all cleanup materials), in pounds.
 - k. The total VOC emissions from all the coatings and cleanup materials employed (j + e), in pounds.
 - l. The rolling 12-month VOC emission rate from all the coatings and cleanup materials employed, in tons.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports of all exceedances of the rolling, 12-month VOC emission limitation (from all the coatings and cleanup materials) of 27.73 tons, and the monthly VOC emission limitation (from cleanup materials) of 1,168 pounds. These reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method (s):
 - a. Emission Limitation:
10.73 lbs VOC/hour, from all coatings

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above by multiplying the maximum coating usage rate (gallon/hour) by the maximum VOC content of all the coatings employed (lbs VOC/gallon of coating).
 - b. Emission Limitation:
3.7 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- c. Emission Limitations:
35.92 TPY, based up on a rolling, 12-month summation of the monthly VOC emission rates from all coatings and cleanup materials

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based upon the record keeping requirements in Section A.III.1 of this permit.
- d. Emission Limitation:
1168 lbs VOC/month, from all cleanup materials

Applicable Compliance Method:
The permittee shall demonstrate compliance with the monthly allowable VOC emission limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K019 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece food can end press # 10 w/ compound applicators	none	none

- 2. **Additional Terms and Conditions**
 - 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit (K019) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane

TLV microgram/cubic meter (ug/m³): 176,000
 Maximum Hourly Emission Rate (lbs/hr): 31.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1654
 MAGLC (ug/m³): 4190

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387040189 Emissions Unit ID: K021 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line # 2 w/ side-seam stripe	OAC rule 3745-31-05 (PTI #03-11340)	9.91 lbs volatile organic compounds (VOC)/hr and 7.8 tons VOC/year, based upon a rolling, 12-month summation, from the application of side-seam coatings (See Section A.1.2.a.)
		114.1 lbs VOC/month and .05 TPY VOC, based upon a rolling, 12-month summation, from all cleanup materials
		0.1 lb particulate emissions (PE)/hr
		0.44 TPY PE
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-09(D)(2)(d).
	OAC rule 3745-21-09 (D)(2)(d)	5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	See A.1.2.b.
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

- a. The 9.91 pounds/hour VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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II. **Operational Restrictions**

1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content emission limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and exempt solvents, as applied.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all the side-seam coatings employed [summation of (b X e) for all side-seam coatings], in tons.
 - g. The total VOC emissions from all the cleanup materials employed [summation of (c X d) for all cleanup materials], in tons.
 - h. The rolling, 12-month summation of VOC emissions from all the side-seam coatings, in tons.
 - i. The rolling, 12-month summation of VOC emissions from all the cleanup materials, in tons.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from 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 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 eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the limitations on the monthly VOC emissions from all cleanup materials used, the rolling, 12-month VOC emissions from all cleanup materials used, and the rolling, 12-month VOC emissions from the application of side-seam coatings. These reports shall be submitted in accordance with section A.1.c of the this permit's General Terms and Conditions.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

- a. Emission Limitation:
 1. 5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents

Applicable Compliance Method:

The record keeping requirements in Section A.III.1. of this permit shall be used to demonstrate compliance with the VOC content limitation above.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- b. Emission Limitations:
 - 0.1 lb/hr PE
 - 0.44 TPY

Applicable Compliance Method:

To determine the actual worst case hourly PE rate (E), the following equation may be used for the paint spraying operations:

$$E = \text{PE rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - \text{TE}) \times (1 - \text{CE})$$

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

As long as compliance with the hourly limitation shall be ensured, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to 40 CFR, Part 60 Appendix A, Methods 1 through 5.

- c. Emission Limitation:
 - 20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitations above in accordance with OAC rule 3745-17-03(B)(1).

- d. Emission Limitation:
7.8 tons VOC/rolling, 12-month summation, from the application of side- seam coatings

0.05 tons VOC/rolling, 12-month summation, from all cleanup materials used

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable VOC limitations above based upon the record keeping requirements in Section A.III.1. of this permit.
- e. Emission Limitation:
9.91 lbs VOC/hr, from the application of side-seam coatings

Applicable Compliance Method:
The permittee shall determine compliance with the hourly allowable VOC emission limitation above by multiplying the maximum coating usage rate (gallons/hr) by the maximum VOC content of all the side-seam coatings (lbs VOC/gallon of side-seam coating).
- f. Emission Limitation:
114.1 lbs VOC/month, from cleanup material usage

Applicable Compliance Method:
The permittee shall demonstrate compliance with the monthly allowable VOC emission limitation based upon the record keeping requirements in Section A.III.1. of this permit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K021 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line # 2 w/ side-seam stripe	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (K021) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK (methyl isobutyl ketone)
 TLV microgram/cubic meter (ug/m³): 4190
 Maximum Hourly Emission Rate (lbs/hr): 9.91
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 661.9
 MAGLC (ug/m³): 4880.95
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387040189 Emissions Unit ID: K023 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line w/ side-seam stripe; line #8	OAC rule 3745-31-05 (PTI #03-8882)	7.4 tons VOC/year, based upon a rolling, 12-month summation, from the application of side-seam coatings and all cleanup materials
	OAC rule 3745-21-09 (D)(2)(d)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09-(D)(2)(d), 3745-17-07(A) and 3745-17-11(B) 5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2) OAC rule 3745-17-07 (A)	0.551 lb particulate emissions (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.
2. The maximum annual side-seam coating usage for this emissions unit shall not exceed 2,652.6 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all coatings used.
3. The maximum annual cleanup material usage for this emissions unit shall not exceed 15 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all cleanup materials used.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and exempt solvents, as applied.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all the side-seam coatings and cleanup materials employed [summation of (b X e) for all side-seam coatings + summation of (c X d) for all cleanup materials], in tons.
 - g. The total number of gallons of all the side-seam coatings employed.
 - h. The total number of gallons of all the cleanup materials employed.
 - i. The rolling, 12-month summation of all the side-seam coatings employed, in gallons.
 - j. The rolling, 12-month summation of all the cleanup materials employed, in gallons.
 - k. The rolling, 12-month summation of VOC emissions from all the side-seam coatings and cleanup materials, in tons.

2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from 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 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 eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month side-seam coating usage restriction of 2652.6 gallons, the rolling, 12-month cleanup material usage restriction of 15 gallons, and the rolling, 12-month VOC emissions limitation of 7.4 tons. These reports shall be submitted in accordance with section A.1.c of the this permit's General Terms and Conditions.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

- a. Emission Limitation:
 1. 5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to demonstrate compliance with the VOC content limitation above.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = \text{PE rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - \text{TE}) \times (1 - \text{CE})$$

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 (60%, from 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with the methods in OAC rule 3745-17-03(B)(10).
- c. Emission Limitation:

20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with the methods in OAC rule 3745-17-03(B)(1)

- d. Emission Limitation:
7.2 tons VOC/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation based upon the record keeping requirements in Section A.III.1 of this permit.
- e. Usage Restrictions:
2562.6 gallons of coatings/rolling, 12-month summation
15 gallons of cleanup materials/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the gallon usage restrictions above based upon the record keeping requirements in Section A.III.1 of this permit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K023 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line w/ side seam stripe; line #8	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit (K023) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

- TLV microgram/cubic meter (ug/m³): 370
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 6.8
 MAGLC (ug/m³): 8.8
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387040189 Emissions Unit ID: K024 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line # 1 w/ side-seam stripe	OAC rule 3745-31-05 (PTI #03-8882)	14.1 tons volatile organic compounds (VOC)/year, based upon a rolling, 12-month summation, from the application of side-seam coatings and all cleanup materials 7.59 lbs VOC/gallon of cleanup material
	OAC rule 3745-21-09 (D)(2)(d)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09-(D)(2)(d), 3745-17-07(A) and 3745-17-11(B) 5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The permittee shall only use coatings in this emissions unit that comply with the applicable VOC content limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.
2. The maximum annual side-seam coating usage for this emissions unit shall not exceed 5076.2 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all coatings used.
3. The maximum annual cleanup material usage for this emissions unit shall not exceed 15 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all cleanup materials used.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and exempt solvents, as applied.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all the side-seam coatings and cleanup materials employed [summation of (b X e) for all side-seam coatings + summation of (c X d) for all cleanup materials], in tons.
 - g. The total number of gallons of all the side-seam coatings employed.
 - h. The total number of gallons of all the cleanup materials employed.
 - i. The rolling, 12-month summation of all the side-seam coatings employed, in gallons.
 - j. The rolling, 12-month summation of all the cleanup materials employed, in gallons.
 - k. The rolling, 12-month summation of VOC emissions from all the side-seam coatings and cleanup materials, in tons.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from 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 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 eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings and cleanup materials in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month side-seam coating usage restriction of 2652.6 gallons, the rolling, 12-month cleanup material usage restriction of 15 gallons, and the rolling, 12-month VOC emissions limitation of 7.4 tons. These reports shall be submitted in accordance with section A.1.c of the this permit's General Terms and Conditions.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

- a. Emission Limitation:
 1. 5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
7.59 lbs VOC/gallon of cleanup material

Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to demonstrate compliance with the VOC content limitations above.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

0.551 lb/hr PE

Applicable Compliance Method:
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = \text{PE rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - \text{TE}) \times (1 - \text{CE})$$

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 (60%, from 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with the methods in OAC rule 3745-17-03(B)(10).
- c. Emission Limitation:

20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with the methods in OAC rule 3745-17-03(B)(1)
- d. Emission Limitation:

14.1 tons VOC/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation based

upon the record keeping requirements in Section A.III.1 of this permit.

- e. Usage Restrictions:
5076.6 gallons of side-seam coatings/rolling, 12-month summation
15 gallons of cleanup materials/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the gallon usage restrictions above based upon the record keeping requirements in Section A.III.1 of this permit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387040189 Emissions Unit ID: K024 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three-piece food can assembly line # 1 w/ side-seam stripe	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit (K024) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Diisobutyl Ketone
TLV microgram/cubic meter (ug/m³): 145,000
Maximum Hourly Emission Rate (lbs/hr): 6.98
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,181
MAGLC (ug/m³): 3,500

- 2. Physical changes to or changes in the method of operation of the emissions unit after its installation or

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

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None