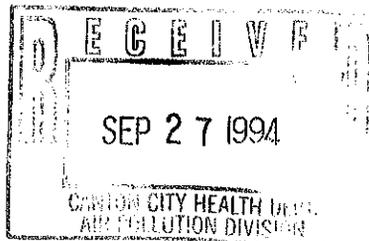




State of Ohio Environmental Protection Agency

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



George V. Voinovich
Governor

Re: Permit to Install
Stark County
Application No: 15-1127
SYNTHETIC MINOR

CERTIFIED MAIL

September 21, 1994

CENTRAL STATES CAN COMPANY
EDWIN GRIFFITH
P.O. BOX 642
MASSILLON, OH 44648

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

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

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

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

Very truly yours,

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

cc: US EPA
CANTON AIR POLLUTION CONTROL



Permit to Install Terms and Conditions

Application No. 15-1127
APS Premise No. 1576130634
Permit Fee: \$200.00

Name of Facility: CENTRAL STATES CAN COMPANY

Person to Contact: EDWIN GRIFFITH

Address: P.O. BOX 642
MASSILLON, OH 44648

Location of proposed source(s): 700 16TH ST., S.E.
MASSILLON, OHIO

Description of proposed source(s):
BASECOAT AND OVERVARNISH CAN COATING LINE WITH A CATALYTIC I
NCINERATOR.

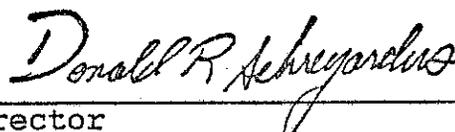
Date of Issuance: September 21, 1994

Effective Date: September 21, 1994

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES(S)

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

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

the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for CENTRAL STATES CAN COMPANY located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K027	Basecoat and Overvarnish Can Coating Line	Catalytic Incinerator	3745-31-05 3745-21-09(D)	* 16 lbs VOC/hr **0.51 lb NO _x /hr

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	*38
NO _x	**2.23

*This includes all VOC emissions from coatings, clean-up solvents and any other VOC sources.

**This represents emissions form fuel combustion in the oven. It does not represent emissions generated by the catalytic incinerator.

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test.

The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

Source

Pollutants

K027

VOC

RECORD(S) RETENTION AND AVAILABILITY

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

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

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

AIR POLLUTION NUISANCES PROHIBITED

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

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. This facility shall maintain a control system which has an overall control efficiency of eighty-one percent (81%) reduction or better. Overall control efficiency is a product of capture efficiency multiplied by the destruction efficiency of the control system.
2. The control system shall have a destruction efficiency of not less than ninety percent (90%), by weight, for the VOC emissions vented to the control system.
3. This facility shall continuously monitor and record the temperature of the exhaust gases from the catalytic incinerator serving this source. The temperature records shall be retained in this facility's files for a period of not less than two (2) years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

A catalyst outlet temperature control set point of not less than 700°F shall be maintained for exhaust gases from the incinerator except during periods of startup and shutdown. Average actual catalyst outlet temperature to be 700°F or higher except during periods of startup and shutdown.

This facility shall submit semi-annual reports which provide the following information for each period during which the average incinerator exhaust gas temperatures fall below 700°F:

- A. the date of the excursion;
- B. the time interval over which the excursion occurred;
- C. the temperature values during the excursion;
- D. the cause(s) for the excursion; and
- E. the corrective action which has been or will be taken to prevent similar excursions in the future.

These reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

These reports shall be submitted to the Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702.

Complying with this Term & Condition does not relieve Central States Can of complying with the reporting requirements found in Ohio Administrative Code (OAC) 3745-15-06.

4. Record-Keeping and Reporting Requirements for Surface Coating or Printing Lines

This facility shall maintain monthly records which list the following information for each surface coating, ink or cleanup material employed in this source:

- A. the company identification of the surface coating, ink or cleanup material;
- B. the number of gallons employed;
- C. the VOC content, in pounds of VOC per gallon of coating;
- D. the VOC content, in pounds of VOC per gallon of coating, minus water;
- E. the water content, in percent by volume;
- F. the nonvolatile (solids) content, in percent by volume;
- G. the gallons of cleanup material used;
- H. the density (in pounds per gallon) of the cleanup material used; and
- I. the gallons of spent solvent shipped off-site.

These monthly records, as well as any supporting coating or ink analyses and computations, shall be retained in the company's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

This facility shall submit semi-annual reports to the Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702, which summarize the following information for each coating and cleanup material employed in this source during the previous six calendar months: company identification of the surface coating or cleanup material, the total number of gallons employed, the VOC content (in pounds VOC per gallon of coating, minus water), the water content and the nonvolatile (solids) content. The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

5. This source is part of a plant-wide alternative daily emission limit pursuant to OAC 3745-21-09(D)(3). As prescribed in this regulation, actual daily emission will not exceed the alternative daily emission.
6. Record-Keeping Requirements Alternative Daily Emission Limit:
 - A. Daily records shall be maintained for a period of not less than two (2) years which list the usage of surface coatings or which list other data, as authorized by the Director, that approximate the usage of surface coatings. The following data shall be listed for each surface coating being recorded: VOC content (in pounds of VOC per gallon of coating, excluding water), density of VOC content of coating (in pounds of VOC per gallon of VOC unless the standard density of 7.36 is recorded), and the type of surface coating according to the classification contained within paragraphs (D)(1) and (D)(2) of this rule.
 - B. Daily records shall be maintained for a period of not less than two (2) years which include the following for any control equipment designed to reduce or prevent the emission of volatile organic compounds: downtime, any operational problems and/or malfunctions which reduce the effective control efficiency, and the average control efficiency, if less than the normally expected control efficiency.
 - C. Other records shall be maintained, as deemed necessary by the Director, in order to provide information on volatile organic compound emissions and/or compliance with the alternative daily emission limitation.

7. Reporting Requirements Alternative Daily Emission Limit:

This facility shall submit semi-annual reports to the Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702, phone (216) 489-3385, which summarize the facility daily actual versus facility daily allowable emission rates for all sources covered under this alternative daily emission limit. The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

This facility shall submit monthly reports to this agency of any daily violations of this alternative daily emission limit. The reports shall be submitted by the 15th day of each month and shall cover the previous calendar month. These reports should include any corrective action taken. If no violations occurred during the previous month, a report shall still be submitted indicating that no violations occurred.

8. The total tons of VOC in the coatings and evaporated clean-up solvents employed in this source shall not exceed 200 tons during any 365 calendar day period rolled on a daily basis and 16.6 tons in any month. The facility shall maintain records indicating the daily amount of pounds of VOC employed, the calculated rolling 365 day total amount of pounds of VOC employed. In order to ensure federal enforceability for the first twelve calendar months of operation, Central States Can shall not exceed the following usage limits for the specific time period:

<u>Month</u>	<u>Total Allowable VOC Usage (tons)</u>
1	16.7
1-2	33.3
1-3	50
1-4	66.7
1-5	83.4
1-6	100
1-7	116.7
1-8	133.5
1-9	150
1-10	167.7
1-11	184
1-12	200