



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1302

CERTIFIED MAIL

September 24, 1997

SEP 30 1997

CENTRAL STATES CAN COMPANY
VICKI HERSHEY
700-16TH ST., S.E.
MASSILLON, OH 44646

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

Environmental Review Appeals Commission
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

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 15-1302
APS Premise No. 1576130634
Permit Fee: \$200.00

Name of Facility: CENTRAL STATES CAN COMPANY

Person to Contact: VICKI HERSHEY

Address: 700-16TH ST., S.E.
MASSILLON, OH 44646

Location of proposed source(s): 700-16TH STREET SE
MASSILLON, OHIO

Description of proposed source(s):
MODIFICATION OF A 2 PIECE/3 PIECE FOOD CAN END SEALING LINE
BY SWITCHING FROM WATER-BASE TO SOLVENT-BASE COMPOUND.

Date of Issuance: September 24, 1997

Effective Date: September 24, 1997

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

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)

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may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

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 filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K030	Two and Three Piece Can End Sealing Compound Line; B65 Blank End Line	Catalytic Incinerator	3745-21-09, including but not limited to 3745-21-09(D)(1)(e)	7.4 pounds VOC/gallon of solids
			3745-21-09, including but not limited to 3745-21-09(D)(2)(e)	7.4 pounds VOC/gallon of solids
			PTI 15-1302 BAT	36 pounds VOC/day .468 ton VOC/month

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	5.61

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The emissions from this emissions unit shall be vented to a catalytic incineration system. This system shall have an overall control efficiency of 67.5 percent or better (overall control efficiency is the product of capture efficiency multiplied times the destruction efficiency of the control device).
2. Only nonphotochemically reactive cleanup solvents shall be employed.
3. OAC rule 3745-21-09(D)(1)(e) and (2)(e) requires that the discharge into the ambient air of any volatile organic compound from an end sealing compound coating line not exceed 7.4 pounds of VOC per gallon of solids when a control device is employed.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed 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 monitors and recorder(s) shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee.

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

- a. the name and identification number of each coating, as applied;
- b. the pounds of VOC per gallon of coating, as applied, and the pounds of VOC per gallon of coating solids, as applied for each coating employed;
- c. the number of gallons of each coating employed;
- d. the calculated, controlled VOC emission rate from all coatings, in pounds or tons;
- e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using the maximum VOC content and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated compliance;
- f. the name and identification of each cleanup material employed;
- g. the VOC content of each cleanup material, in pounds per gallon;
- h. the number of gallons of each cleanup material employed;
- i. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons;
- j. the calculated, total controlled VOC emission rate from all cleanup materials and all coatings, in pounds or tons;

- k. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
- l. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and,
- m. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

C. Reporting Requirements

1. The permittee shall notify the Director (the Canton Air Pollution Control) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds 36 pounds or 7.4 pounds per gallon of solid or any monthly record showing that the calculated, controlled VOC emission rate exceeds .468 ton. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, within 45 days after the exceedance occurs.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
4. The permittee shall submit deviation reports that identify if any photochemically reactive cleanup solvents

are employed and the number of gallons of such solvents employed.

D. Compliance Methods and 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 this emissions unit has switched from a water based coating to a solvent based coating;
 - b. the emission testing shall be conducted to demonstrate compliance with the overall control efficiency minimum of 67.5 percent. (Overall control efficiency is a product of the capture efficiency times the control efficiency of the control device). Capture efficiency shall be determined by doing a material balance by comparing the VOC content of the materials employed per hour to the inlet emission rate;
 - c. the following test method(s) shall be employed to demonstrate compliance: 25 and 25A; and,
 - d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit and "Intent to Test" notification to the Canton Air Pollution Control. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton Air Pollution Control Agency's refusal to accept the results of the emission test(s).

Personnel from the Canton Air Pollution Control Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the

Canton Air Pollution Control Agency within 30 days following completion of the test(s).

2. Compliance with the emission limitation(s) in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation

36 pounds VOC/day

Compliance Method

See Monitoring and Recordkeeping Section

b. Emission Limitation

No photochemically reactive cleanup solvent

Compliance Method

See Monitoring and Recordkeeping Section

c. Emission Limitation

.468 ton VOC/month

Compliance Method

See Monitoring and Recordkeeping Section

d. Emission Limitation

Minimum Overall Control Efficiency of 65.7 percent

Compliance Method

See Testing Requirements

e. Emission Limitation

7.4 pounds VOC/gallon of solid after controls

Compliance Method

See Monitoring and Recordkeeping Section Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

E. Miscellaneous Requirements

None.