State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
LUCAS COUNTY
Application No: 04-01379
Fac ID: 0448002007

DATE: 1/20/2005

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
KKKK	MACT
WW	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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

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

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

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

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **TDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 1/20/2005**
Terms and Conditions	**Effective Date: 1/20/2005**

FINAL PERMIT TO INSTALL 04-01379

Application Number: 04-01379

Facility ID: 0448002007

Permit Fee: **$400**

Name of Facility: Rexam Beverage Can Company

Person to Contact: Geoffrey Wortley

Address: 8770 West Bryn Mawr Ave Suite 175
Chicago, IL 60631-3655

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

Description of proposed emissions unit(s):
Modification of Line 3 to allow for production of either 12 ounce or 24 ounce beverage cans.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

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

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

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

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

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the

previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06**.**
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

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

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

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

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

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

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

9. Compliance Requirements

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

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

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

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

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

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

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

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

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

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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

11. Best Available Technology

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

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

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

5. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
CO	4.68
NOx	5.57
PE	2.33
PM10	2.62
SO2	0.20
VOC	106.24 (39.90 contemporaneous increase)

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - Line 2 with one exhaust stack	OAC rule 3745-31-05(C)	5.13 tons VOC per rolling, 12-month period
2-piece beverage can continuous motion base coater and 3.0 mmBtu direct fired natural gas pin oven with no controls	OAC 3745-31-05(A)(3) (PTI 04-01269 issued 9/25/2001)	2.0 pounds of volatile organic compounds (VOC) per gallon of coating minus water and exempt solvents; and see Section A.I.2.a
	OAC rule 3745-31-05(C)	6.16 pounds per hour and 5.04 tons VOC per rolling, 12-month period from all coatings and clean-up materials; 0.25 pound per hour and 1.10 tons per year carbon monoxide (CO) emissions; 0.30 pound per hour and 1.32 tons per year nitrogen oxides (NOx) emissions; 0.01 pound per hour and 0.05 ton per year of (PE); 0.03 pound per hour and 0.13 ton per year of PM_{10}; and 0.01 pound per hour and 0.05 ton per year sulfur dioxide (SO_2) emissions; and 0.02 pound per hour and 0.09 ton VOC per rolling, 12-month period from the combustion of natural gas (see Section A.I.2.b)
	OAC rule 3745-21-09(D)(1)	See Section A.I.2.c
	40 CFR Part 60, Subpart WW	2.42 pounds of VOC per gallon of coating solids (0.29 kilogram of VOC per liter of coating solids); and

	see section A.I.2.d
OAC rule 3745-18-06(C)	See Section A.I.2.c
OAC rule 3745-21-08(B)	See Section A.I.2.e
OAC rule 3745-23-06(B)	See Section A.I.2.f

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart WW, and 40 CFR Part 63, Subpart KKKK.

2.b The hourly and annual emission limitations were established for PTI purposes to reflect the potential to emit for the combustion of natural gas in this emissions unit at the maximum burner capacity of 3.0 mmBtu per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

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

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

2.e The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by complying with all applicable rules.

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

2.f The permittee has satisfied the “best available control techniques and operating practices” and “latest available control techniques and operating practices” required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

2. Coating usage shall not exceed 10,181 gallons per year based upon a rolling, 12-month summation of the usage rates. To ensure enforceability during the first twelve calendar months of operation, following the issuance of this permit, actual emissions calculated from material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions from this emissions unit and the facility.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

   a. i. the name and identification number of each coating (i.e., base coat), as applied,
      ii. the volume of each coating, in gallons,
      iii. the VOC content of each coating, in pounds of VOC per gallon of coating,
      iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents,
      v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied,
      vi. the monthly total VOC emissions from all coatings employed (ii) x (iii), in tons;

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

   c. the rolling, 12-month summation of all coatings employed, in gallons; and

   d. the rolling, 12-month summation of VOC emissions from all coatings and clean-up materials employed, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit as fuel. Each report shall be submitted within 30 days after the deviation occurs.

2. 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. 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.

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage rate limitations for coatings specified under A.II.2. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section A.1.

4. Pursuant to the 40 CFR Part 60.7, the permittee shall submit quarterly written reports listing each coating used during the previous calendar quarter and the VOC content of each coating determined using Method 24 or supplied by the manufacturers of the coatings. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section A.1.

V. Testing Requirements

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

   a. Emission Limitation:

      0.25 pound per hour CO emissions

      Applicable Compliance Method

      Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

   b. Emission Limitation:

1.10 tons per year CO emissions

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.25 pound CO per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly CO limit constitutes compliance with the annual CO limit.

c. Emission Limitation:

0.30 pound per hour NO_x emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

d. Emission Limitation:

1.32 tons per year NO_x emissions

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.30 pound NO_x/hr) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly NO_x limit constitutes compliance with the annual NO_x limit.

e. Emission Limitation:

0.01 pound per hour PE

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 1.9 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

f. Emission Limitation:

0.05 ton per year PE

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

g. Emission Limitation:

0.03 pound per hour PM_{10}

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 7.6 pounds of PM_{10} per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

h. Emission Limitation:

0.13 ton per year PM_{10}

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate(0.03 pound per hour PM_{10}) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

i. Emission Limitation:

0.01 pound per hour SO_2

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 0.6 pound of SO_2 per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

j. Emission Limitation:

0.05 ton per year SO_2 emissions from the pin oven

Applicable Compliance Method

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour SO_2) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore ,compliance with the hourly emission limitation constitutes compliance with the annual SO_2 emission limitation.

k. Emission Limitation:

0.02 pound per hour VOC emissions from the combustion of natural gas

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 5.5 pounds of VOC per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas (0.02 pound per hour) and the emissions from all coatings and clean-up materials utilized (6.11 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

l. Emission Limitation:

0.09 ton of VOC per year from the combustion of natural gas

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour VOC) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual VOC emission limitation.

m. Emission limitation:

2.0 pounds of VOC per gallon of coating minus water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

n. Emission limitation:

2.42 pound of VOC per gallon of coating solids (0.29 kilogram of VOC per liter of coating solids)

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides

alternative analytical procedures or alternative precision statements for Method 24 or 24A.

o. Emission Limitation:

6.16 pounds per hour VOC emissions from the coatings and clean-up materials

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coating application rate (6.22 gallon per hour) by the maximum VOC content recorded in Section A.III. above (in pounds VOC per gallon).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas (0.02 pound per hour) and the emissions from all coatings and clean-up materials utilized (6.11 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

p. Emission Limitation:

5.04 tons of VOC per year from all coatings and clean-up materials

Applicable Compliance Method:

Compliance with this emission limitation will be demonstrated by the monitoring and recordkeeping requirements of Section III.

q. Emission Limitation:

5.13 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings and clean-up materials. Compliance with this emission limitation will be demonstrated by the monitoring and recordkeeping requirements of Section III.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - Line 2, 2-piece beverage can continuous motion base coater and pin oven with no controls		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. Should any coating formulations cause an odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K006 and K011 was evaluated based on the actual materials and the design parameters of the each 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: glycol ethers

   TLV (mg/m3): 19 (5ppm*90.12/24.05)

Maximum Hourly Emission Rate (lbs/hr): 11.41
(for emissions units K006 and K011)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 79.81 $\mu g/m^3$

2. Physical changes to or changes in the method of operation of the emissions unit(s) after its (their) 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 (typically for coatings or clean-up 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K011 - Line 3 / Two-piece beverage can manufacturing and coating line with four exhaust stacks	OAC rule 3745-31-10 thru 27	101.15 tons per rolling, 12-month period of volatile organic compound (VOC) emissions
12-ounce and 24-ounce beverage can bodymaking process consisting of: (1) cupper, and (2) trimmers, all uncontrolled, and (2) bodymakers controlled by an oil mist collector	OAC rule 3745-31-05(A)(3)	0.30 pound per hour and 1.32 tons per year of particulate emissions (PE); 0.30 pound per hour and 1.32 tons per year of PM_{10}; 0.04 pound per hour and 0.18 ton per year VOC; and see sections A.I.2.a. and A.I.2.b
	OAC rule 3745-17-07(A)(1)	See section A.I.2.c
	OAC rule 3745-17-11(B)(1)	See section A.I.2.c
	OAC rule 3745-21- 07(G)(1)	See section A.I.2.c
1.925 mmBtu/hr direct-fired natural gas washer drying oven with no controls	OAC rule 3745-31-05(A)(3)	0.16 pound per hour and 0.69 ton per year carbon monoxide (CO) emissions; 0.19 pound per hour and 0.83 ton per year nitrogen oxides (NOx) emissions; 0.01 pound per hour and 0.05 ton per year of (PE); 0.02 pound per hour and 0.09 ton per year of PM_{10}; and 0.01 pound per hour and 0.05 ton per year sulfur dioxide (SO_2) emissions; and

		0.01 pound per hour and 0.05 ton VOC per year from the combustion of natural gas; and see sections A.I.2.d and A.I.2.e
	OAC rule 3745-18-06(C)	See section A.I.2.c
	OAC rule 3745-21-08(B)	See section A.I.2.f
	OAC rule 3745-23-06(B)	See section A.I.2.g
continuous motion printer and pin oven - ink, over varnish, and exterior bottom end varnish application, clean-up solvent emissions and 2.75 mmBtu/hr direct-fired natural gas curing oven, with no controls	OAC rule 3745-31-05(A)(3)	0.23 pound per hour and 1.01 tons per year carbon monoxide (CO) emissions; 0.27 pound per hour and 1.18 tons per year nitrogen oxides (NOx) emissions; 0.01 pound per hour and 0.05 ton per year of PE; 0.02 pound per hour and 0.09 ton per year of PM_{10}; 0.01 pound per hour and 0.05 ton per year sulfur dioxide (SO_2) emissions; 0.02 pound per hour and 0.09 ton VOC per year from the combustion of natural gas (see section A.I.2.d); 9.86 pounds per hour and 32.43 tons per year VOC emissions from all coatings and clean-up materials; and see sections A.I.2.e, A.I.2.h, and A.I.2.i
	OAC rule 3745-18-06(C)	See section A.I.2.c
	OAC rule 3745-21-08(B)	See section A.I.2.f
	OAC rule 3745-21-09(D)	See section A.I.2.c
	OAC rule 3745-23-06(B)	See section A.I.2.g
	40 CFR Part 60, Subpart WW	See section A.I.2.j
inside body spray coating with 5.2 mmBtu/hr direct fired natural gas inside body bake oven, with no controls	OAC rule 3745-31-05(A)(3)	0.43 pound per hour and 1.88 tons per year CO emissions; 0.51 pound per hour and 2.24 tons per year NOx emissions; 0.01 pound per hour and 0.05 ton per year of PE;

	0.04 pound per hour and 0.18 ton per year of PM_{10}; 0.01 pound per hour and 0.05 ton per year SO_2 emissions; 0.03 pound per hour and 0.13 ton VOC per year from the combustion of natural gas (see section A.I.2.d); 0.26 pound per hour and 0.81 ton per year of PE from all coating operations; 0.26 pound per hour and 0.81 ton per year of PM_{10} from all coating operations; 21.68 pounds per hour and 68.27 tons per year VOC emissions from all coatings; and see sections A.I.2.e, A.I.2.i, and A.I.2.k
OAC rule 3745-17-07(A)(1)	See section A.I.2.l
OAC rule 3745-17-11(B)(1)	See section A.I.2.c
OAC rule 3745-18-06(C)	See section A.I.2.c
OAC rule 3745-21-08(B)	See section A.I.2.f
OAC rule 3745-21-09(D)	See section A.I.2.c
OAC rule 3745-23-06(B)	See section A.I.2.g
40 CFR Part 60, Subpart WW	See section A.I.2.j

2. Additional Terms and Conditions

2.a The permittee shall not operate the bodymaking equipment when the oil mist collection system is not in operation.

2.b Visible particulate emissions from the oil mist collector exhaust shall not exceed 5% opacity as a 6-minute average.

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

2.d The hourly and annual emission limitations were established for PTI purposes to reflect the potential to emit for the combustion of natural gas in this emissions unit at the maximum burner capacity. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

2.e Visible particulate emissions from the oven exhaust shall not exceed 10% opacity as a 6-minute average.

2.f The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by complying with all applicable rules.

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

2.g The permittee has satisfied the “best available control techniques and operating practices” and “latest available control techniques and operating practices” required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

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

inks:	2.59 pounds per gallon of coating excluding water and exempt solvents;
over varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
over varnish:	2.9 pounds per gallon of coating solids;
exterior bottom end varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
exterior bottom end varnish:	2.9 pounds per gallon of coating solids; and
clean-up solvent:	6.0 pounds of VOC per gallon.

2.i The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D), 40 CFR Part 60, Subpart WW, and 40 CFR Part 63, Subpart KKKK.

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

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

inside spray: 2.9 pounds per gallon of coating excluding water and exempt solvents; and

inside spray: 4.9 pounds per gallon of coating solids.

2.l Visible particulate emissions from the inside body spray coating exhaust shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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

Inside spray:	148,214 gallons per rolling 12-month period;
Over varnish:	50,596 gallons per rolling 12-month period;
Bottom varnish:	2,447 gallons per rolling 12-month period;
Inks:	4,270 gallons per rolling 12-month period; and
Clean-up solvent:	360 gallons per rolling 12-month period.

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

Maximum Allowable Cumulative Usage

Month	Over Varnish gallons	Bottom Varnish gallons	Inside Spray gallons	Inks gallons	Clean-up Solvent gallons
1	4,460	220	12,640	370	30
1-2	8,920	440	25,280	740	60
1-3	13,380	660	37,920	1,110	90
1-4	17,840	880	50,560	1,480	120
1-5	22,300	1,100	63,200	1,850	150
1-6	26,760	1,320	75,840	2,220	180
1-7	31,220	1,540	88,480	2,590	210
1-8	35,680	1,760	101,120	2,960	240
1-9	40,140	1,980	113,760	3,330	270
1-10	44,600	2,200	126,400	3,700	300
1-11	49,060	2,440	139,040	4,070	330
1-12	50,596	2,447	148,214	4,270	360

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

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

2. The permittee shall maintain daily records that document any time periods when the oil mist collection system was not in service when the bodymaking equipment was in operation.

3. The permittee shall perform daily checks, when the body making process is in operation and when the weather conditions allow, for any visible particulate emissions from the oil mist collector stack. 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.

   If the daily checks show no visible emissions for 30 consecutive days, the required frequency of visible emissions checks may be reduced to weekly (once per week), when the emissions unit is in operation. If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive days of no visible emissions during operation.

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

   a. i. the name and identification number of each coating (i.e., over varnish, bottom varnish or inside spray coating), as applied,
      ii. the volume of each coating, in gallons,
      iii. the VOC content of each coating, in pounds of VOC per gallon of coating,
      iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents,
      v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied,
      vi. the monthly total VOC emissions from all coatings employed, (ii) x (iii) ÷ 2000, in tons;

   b. i. the name and identification number of each ink, as applied,
      ii. the volume (and mass) of each ink, in gallons (and pounds),
      iii. the VOC content of each ink, in pounds of VOC per gallon (or pound) of ink,
      iv. the VOC content of each ink, in pounds of VOC per gallon of coating excluding water and exempt solvents,
      v. the monthly total VOC emissions from all inks employed, calculated on a volume (or mass) basis, (ii) x (iii) ÷ 2000, in tons;

   c. i. the name and identification number of each clean-up material employed,
      ii. the volume of each clean-up material employed, in gallons,

iii. the VOC content of each clean-up material employed, in pounds of VOC per gallon,

iv. the monthly total VOC emissions from all clean-up materials employed, (ii) x (iii) ÷ 2000, in tons;

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

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

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit as fuel. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the oil mist collector was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

3. 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, inks, or clean-up solvent. 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.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage rate limitations for coatings, inks and clean-up solvents specified under A.II.2. and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative usage levels of coatings, inks and clean-up solvents. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section A.1.

5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. 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.

6. Pursuant to the 40 CFR Part 60.7, the permittee shall submit written reports of the following:

   a. Construction date (no later than 30 days after such date);
   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date); and
   c. Actual start-up date (within 15 days after such date)

   The reports are to be sent to:

   Ohio Environmental Protection Agency
   DAPC - Permit Management Unit
   P. O. Box 163669
   Columbus, Ohio 43216-3669

   and

   Toledo Division of Environmental Services
   348 South Erie Street
   Toledo, Ohio 43602

7. Pursuant to the 40 CFR Part 60.8, the permittee shall submit quarterly written reports listing each coating used during the previous calendar quarter and the VOC content of each coating determined using Method 24 or supplied by the manufacturers of the coatings. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section A.1.

V. Testing Requirements

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

   a. Emission Limitation:

101.15 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings, inks and clean-up materials. Compliance with this emission limitation will be demonstrated by the monitoring and recordkeeping requirements of Section III.

b. Emission Limitation:

10% opacity as a 6-minute average from the oven exhaust

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions readings taken in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

5% opacity as a 6-minute average from the oil mist collector and inside body spray

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions readings taken in accordance with Method 9 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

0.30 pound per hour PE from the bodymaking process

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coolant usage (1.25 gal/hr) by the coolant density (8.55 lb coating/gal coating), the solid concentration (0.55 lb PE/lb coating) and the estimated oil mist collector efficiency (1-0.95).

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

d. Emission Limitation:

1.32 tons per year PE from the bodymaking process

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.30 pound per hour) multiplied by the maximum annual operating hours (8760 hours per year), divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limitation constitutes compliance with the annual particulate emission limitation.

e. Emission Limitation:

0.30 pound per hour PM_{10} from the bodymaking process

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coolant usage (1.25 gal/hr) by the coolant density (8.55 lb coating/gal coating), the solid concentration (0.55 lb PM_{10}/lb coating) and the estimated oil mist collector efficiency (1-0.95).

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

f. Emission Limitation:

1.32 tons per year PM_{10} from the bodymaking process

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.30 pound per hour PM_{10}) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual PM_{10} emission limitation.

g. Emission Limitation:

0.04 pound per hour VOC from the bodymaking process

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coolant usage (1.25 gal/hr) by the coolant density (8.55 lb coating/gal coating), the VOC concentration (0.065 lb PE/lb coating) and the estimated oil mist collector efficiency (1-0.95).

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

h. Emission Limitation:

0.18 ton per year VOC from the bodymaking process

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.04 pound per hour) multiplied by the maximum annual operating hours (8760 hours per year), divided by 2000 pounds/ton. Therefore, compliance with the hourly VOC emission limitation constitutes compliance with the annual particulate emission limitation.

i. Emission Limitation:

0.16 pound per hour CO emissions from the washer oven

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (1.925 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

j. Emission Limitation:

0.69 ton per year CO emissions from the washer oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.16 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly CO limit constitutes compliance with the annual CO limit.

k. Emission Limitation:

0.19 pound per hour NO_x emissions from the washer oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (1.925 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

l. Emission Limitation:

0.83 ton per year NO_x emissions from the washer oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.19 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly NO_x limit constitutes compliance with the annual NO_x limit.

m. Emission Limitation:

0.01 pound per hour PE from the washer oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (1.925 mmBtu/hr) by an emission factor of 1.9 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

n. Emission Limitation:

0.05 ton per year PE from the washer oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

o. Emission Limitation:

0.02 pound per hour PM_{10} from the washer oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (1.925 mmBtu/hr) by an emission factor of 7.6 pounds of PM_{10} per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

p. Emission Limitation:

0.09 ton per year PM_{10} from the washer oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.02 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

q. Emission Limitation:

0.01 pound per hour SO_2 emissions from the washer oven

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (1.925 mmBtu/hr) by an emission factor of 0.6 pound of SO_2 per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

r. Emission Limitation:

0.05 ton per year SO_2 emissions from the washer oven

Applicable Compliance Method

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore ,compliance with the hourly emission limitation constitutes compliance with the annual SO_2 emission limitation.

s. Emission Limitation:

0.01pound per hour VOC emissions from the combustion of natural gas in the washer oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (1.925 mmBtu/hr) by an emission factor of 5.5 pounds of VOC per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

t. Emission Limitation:

0.05 ton per year VOC emissions from the combustion of natural gas in the washer oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Compliance with the hourly VOC emissions limit constitutes compliance with the annual limit.

u. Emission Limitation:

0.23 pound per hour CO emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

v. Emission Limitation:

1.01 tons per year CO emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.23 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly CO limit constitutes compliance with the annual CO limit.

w. Emission Limitation:

0.27 pound per hour NO_x emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

x. Emission Limitation:

1.18 tons per year NO_x emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.27 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly NO_x limit constitutes compliance with the annual NO_x limit.

y. Emission Limitation:

0.01 pound per hour PE emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 1.9 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

z. Emission Limitation:

0.05 ton per year PE emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

aa. Emission Limitation:

0.02 pound per hour PM_{10} emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 7.6 pounds of PM_{10} per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

bb. Emission Limitation:

0.09 ton per year PM_{10} emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.02 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

cc. Emission Limitation:

0.01 pound per hour SO_2 emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 0.6 pound of SO_2 per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

dd. Emission Limitation:

0.05 ton per year SO_2 emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore ,compliance with the hourly emission limitation constitutes compliance with the annual SO_2 emission limitation.

ee. Emission Limitation:

0.02 pound per hour VOC emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 5.5 pound of VOC per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the pin oven (0.02 pound per hour) and the emissions from all coatings and clean-up materials utilized in the continuous motion printer (9.86 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

ff. Emission Limitation:

0.09 ton per year VOC emissions from the combustion of natural gas in the pin oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.02 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Compliance with the hourly VOC emissions limit constitutes compliance with the annual limit.

gg. Emission Limitation:

9.86 pounds per hour VOC emissions from all coatings, inks and clean-up materials utilized in the continuous motion printer

Applicable Compliance Method:

Compliance shall be demonstrated by a summation of the VOC emissions from each coating and ink, calculated as the maximum application rate (in gallons per hour) for each coating and ink, multiplied by the maximum VOC content recorded in Section A.III. above (in pounds VOC per gallon).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the pin oven (0.02 pound per hour) and the emissions from all coatings, inks and clean-up materials utilized in the continuous motion printer (9.86 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

hh. Emission Limitation:

32.43 tons of VOC per year emissions from all coatings, inks and clean-up materials utilized in the continuous motion printer

Applicable Compliance Method:

Compliance with this emission limitation will be demonstrated by the monitoring and recordkeeping requirements of Section III.

ii. Emission Limitation:

0.43 pound per hour CO emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (5.2 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

jj. Emission Limitation:

1.88 tons per year CO emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.43 pound per hour) multiplied by the maximum annual hours of operation (8,760 hrs/yr), and divided by 2000 pounds/ton. Therefore, compliance with the hourly CO limit constitutes compliance with the annual CO limit.

kk. Emission Limitation:

0.51 pound per hour NO_x emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (5.2 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

ll. Emission Limitation:

2.24 tons per year NO_x emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.51 pound per hour) multiplied by the maximum annual hours of operation (8760 hrs/yr), and divided by 2000 pounds/ton. Therefore, compliance with the hourly NO_x limit constitutes compliance with the annual NO_x limit.

mm. Emission Limitation:

0.01 pound per hour PE emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (5.2 mmBtu/hr) by an emission factor of 1.7 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance using Methods 1 thru 5 of 40 CFR part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the inside body bake oven (0.01 pound per hour) and the emissions from all coatings utilized in the inside bocy spray operation (0.19 pound per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

oo. Emission Limitation:

0.05 ton per year PE emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by the maximum annual hours of operation (8760 hrs/yr), and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

pp. Emission Limitation:

0.04 pound per hour PM_{10} emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (5.2 mmBtu/hr) by an emission factor of 7.6 pound of PM_{10} per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the inside body bake oven (0.04 pound per hour) and the emissions from all coatings utilized in the inside bocy spray operation (0.19 pound per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

qq. Emission Limitation:

0.18 ton per year PM_{10} emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.04 pound per hour) multiplied by the maximum annual hours of operation (8760 hrs/yr), and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

rr. Emission Limitation:

0.01 pound per hour SO_2 emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (5.2 mmBtu/hr) by an emission factor of 0.6 pound of SO_2 per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

ss. Emission Limitation:

0.05 ton per year SO_2 emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore ,compliance with the hourly emission limitation constitutes compliance with the annual SO_2 emission limitation.

tt. Emission Limitation:

0.03 pound per hour VOC emissions from the combustion of natural gas in the inside body bake oven

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (5.2 mmBtu/hr) by an emission factor of 5.5 pounds of VOC per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the inside body bake oven (0.03 pound per hour) and the emissions from all coatings utilized in the inside body spray operation (21.68 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

uu. Emission Limitation:

0.13 ton per year of VOC emissions from the inside body bake oven

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.03 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Compliance with the hourly VOC emissions limit constitutes compliance with the annual limit.

vv. Emission Limitation:

0.26 pound per hour PE emissions from the inside body spray

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coating usage rate (23.52 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.216 lb PE/lb coating), the estimated transfer efficiency (1-0.94) and the estimated collector efficiency (1-0.90).

If required, the permittee shall demonstrate compliance using Methods 1 thru 5 of 40 CFR part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the inside body bake oven (0.01 pound per hour) and the emissions from all coatings utilized in the inside bocy spray operation

(0.26 pound per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

ww. Emission Limitation:

0.81 ton per year PE emissions from the inside body spray

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coating usage rate (148,214 gal/yr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.216 lb PE/lb coating), the estimated transfer efficiency (1-0.94) and the estimated collector efficiency (1-0.90), and then dividing by 2000 lb/ton.

xx. Emission Limitation:

0.26 pound per hour PM_{10} emissions from the inside body spray

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coating usage rate (23.52 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.216 lb PM_{10}/lb coating), the estimated transfer efficiency (1-0.94) and the estimated collector efficiency (1-0.90).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the inside body bake oven (0.04 pound per hour) and the emissions from all coatings utilized in the inside bocy spray operation (0.19 pound per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

yy. Emission Limitation:

0.81 ton per year PM_{10} emissions from the inside body spray

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum coating usage rate (148,214 gal/yr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.55 lb PM_{10}/lb coating), the estimated transfer efficiency (1-0.94) and the estimated collector efficiency (1-0.90), and then dividing by 2000 lb/ton.

zz. Emission Limitation:

21.68 pounds per hour VOC emissions from all coatings utilized in the inside body spray operation

Applicable Compliance Method:

Compliance shall be demonstrated by a summation of the VOC emissions from each coating utilized, calculated as the maximum application rate for the inside spray coating (23.52 gallons per hour), multiplied by the maximum VOC content recorded in Section A.III. above (in pounds VOC per gallon).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas in the inside body bake oven (0.03 pound per hour) and the emissions from all coatings utilized in the inside body spray operation (21.68 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

aaa. Emission Limitation:

68.27 tons of VOC per year emissions from all coatings utilized in the inside body spray operation

Applicable Compliance Method:

Compliance with this emission limitation will be demonstrated by the monitoring and recordkeeping requirements of Section III.

bbb. Emission limitation:

inks: 2.59 pounds per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

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

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

ccc. Emission limitation:

over varnish: 2.1 pounds per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

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

ddd. Emission limitation:

over varnish: 2.9 pounds per gallon of coating solids

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

eee. Emission limitation:

bottom varnish (exterior bottom end coating): 2.1 pounds per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

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

fff. Emission limitation:

bottom varnish (exterior bottom end coating): 2.9 pounds per gallon of coating solids

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

ggg. Emission limitation:

clean-up solvent: 6.0 pounds of VOC per gallon.

Applicable Compliance Method:

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

hhh. Emission limitation:

inside spray: 2.9 pounds per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

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

iii. Emission limitation:

inside spray: 4.9 pounds per gallon of coating solids

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by an evaluation performed in accordance with 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K011 - Line 3 / Two-piece beverage can manufacturing and coating line		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. Should any coating formulations cause an odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K006 and K011 was evaluated based on the actual materials and the design parameters of the each 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: glycol ethers

   TLV (mg/m3): 19 (5ppm*90.12/24.05)

   Maximum Hourly Emission Rate (lbs/hr): 11.41

(for emissions units K006 and K011)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 79.81 $\mu g/m^3$

2. Physical changes to or changes in the method of operation of the emissions unit(s) after its (their) 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 (typically for coatings or clean-up 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None