☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install 04-10352

A. Source Description

Crown Food Packaging currently coats 36 " wide steel coil for various food and household items on a continuous roll coating line with two coating stations (K004 & K005). It also can coat 66" wide aluminum coil on K001. Each coating applicator is contained within a permanent total enclosure. The coater room and oven VOC emissions are controlled by separate catalytic incinerators. This PTI is to increase the VOC content of the coating and to increase the hourly emission rate for K001 only, while keeping the same annual allowable limit.

B. Facility Emissions and Attainment Status

Without a Synthetic Minor Determination, the increase in the hourly allowable emission rate would make K001 a Major Source with allowables over 300 tons/yr. of VOC. Small amounts of PE, SO2, NOx and CO are emitted as products of combustion from the oven and incinerator, but none of these pollutants would classify this facility as Major. The location is in Toledo, OH, Lucas County. The portion of Lucas County where this plant is located is classified as attainment for ozone, SO2, NOx and CO. PE is unclassified.

C. Source Emissions

Operating this emission unit at 70 # VOC/ hr for 8760 hrs/ yr would make this a major source. The permittee has agreed to stay under the original annual limit of 182.1 tons/yr VOC as a rolling 12-month summation that was established in PTI 04-1065 effective on 6/25/97. The permittee will maintain a monitoring, record keeping and reporting program to track coating and cleanup material usage in order to demonstrate compliance.

D. Conclusion

The original equipment installed under PTI 04-1065 was not changed. Maintaining a monitoring, record keeping and reporting program to track coating and cleanup material usage will be a satisfactory method to demonstrate that the permittee will not exceed the annual allowable limit of 182.1 tons VOC/ yr as a rolling 12-month summation that was previously established. Therefore, this PTI is not subject to PSD review.

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: DRAFT PERMIT TO INSTALL
LUCAS COUNTY
Application No: 04-01352

CERTIFIED MAIL

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

DATE: 5/27/2004

Crown Food Packaging, Inc
Mike Antry
One Crown Way
Philadelphia, PA 19154

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA TDES Toledo Metropolitan Area Council of Governments IN MI

LUCAS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **04-01352** FOR AN AIR CONTAMINANT SOURCE FOR
CROWN FOOD PACKAGING, INC

On 5/27/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Crown Food Packaging, Inc**, located at **5201 Enterprise Blvd., Toledo**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01352:

66 inch coil coating line w/16mmBtu direct fired natural gas drying oven controlled by a permanent total enclosure and a catalytic incinerator; modification to increase allowable emissions.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43602
[(419)936-3015]

DRAFT PERMIT TO INSTALL 04-01352

Application Number: 04-01352

APS Premise Number: 0448010466

Permit Fee: **To be entered upon final issuance**

Name of Facility: Crown Food Packaging, Inc

Person to Contact: Mike **Antry**
Address: One Crown Way
Philadelphia, PA 19154

Location of proposed air contaminant source(s) [emissions unit(s)]:
5201 Enterprise Blvd.
Toledo, Ohio

Description of proposed emissions unit(s):
66 inch coil coating line w/16mmBtu direct fired natural gas drying oven controlled by a permanent total enclosure and a catalytic incinerator; modification to increase allowable emissions.

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

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

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

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

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

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

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

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

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
PE	0.18 (no increase)
SO2	0.04 (no increase)
NOx	10.07 (no increase)
CO	8.3 (no increase)
VOC	182.1 (no 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
K001 - 66-inch coil coating line with a 16 mmBtu/hr direct fired natural gas drying oven controlled by a permanent total enclosure and a catalytic incinerator	OAC rule 3745-31-05(A)(3)	70.0 lbs/hr of volatile organic compound (VOC) emissions from coating and cleanup materials, 1.9 lbs/hr of carbon monoxide (CO), 8.3 tons/yr of CO, 2.3 lbs/hr of nitrogen oxides (NOx), 10.07 tons/yr of NOx, 0.04 lb/hr of particulate emissions (PE), 0.18 ton/yr of PE, 0.01 lb/hr of sulfur dioxide (SO2), 0.04 ton/yr of SO2, and See A.I.2.a. through A.I.2.c. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07.
	OAC rule 3745-31-05(C)	182.1 tons/yr of VOC as a rolling,12-based upon a rolling, 365-day summation of the daily emissions from coating and cleanup materials

OAC rule 3745-17-07(A)(1)	See A.I.2.d. below.
OAC rule 3745-17-11(A)(2)	See A.I.2.e. below.
OAC rule 3745-18-06(A)	See A.I.2.e. below.
OAC rule 3745-21-08(B)	See A.I.2.f. below.
OAC rule 3745-21-09(B)(6)	See A.I.2.e. below.
OAC rule 3745-21-09(E)	See A.I.2.e. below.
OAC rule 3745-23-06(B)	See A.I.2.g. below.
40 CFR Part 63, Subpart SSSS	See A.VI.1. below.

2. Additional Terms and Conditions

2.a The permittee shall operate and maintain a permanent total enclosure and a catalytic incinerator to capture and control the VOC emissions.

2.b The permittee shall maintain a minimum 90% overall control efficiency for the VOC emissions from this emissions unit.

2.c The permittee shall maintain a permanent total enclosure that shall capture 100% of the VOC emitted by the coating applicator.

2.d Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2.e 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.f The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

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 "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).

II. Operational Restrictions

1. This emissions unit shall be totally enclosed such that all the VOC emissions are captured for venting to the catalytic incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water as a 3-hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and

g. all VOC emissions from the coating line must be captured and contained for discharge to the catalytic incinerator.

2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

3. The maximum annual volatile organic material usage (coating and cleanup solvent) for this emissions unit shall not exceed 1,821 tons/yr based upon a rolling, 365-day summation of the volatile organic material usage figures.

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

Month(s)	Maximum monthly volatile organic material usage, tons/month
1	260
1-2	520
1-3	770
1-4	1,020
1-5	1,280
1-6	1,530
1-7	1,780
1-8	1,821
1-9	1,821
1-10	1,821
1-11	1,821
1-12	1,821

After the first 12 calendar months of operation, compliance with the annual volatile organic material usage limitation shall be based upon a rolling, 365-day summation of the volatile organic material usage figures.

4. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day, all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column whenever the emissions unit was in operation.

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

3. The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the lbs of VOC/ gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the total uncontrolled VOC emissions from all coatings, in pounds per day;

d. the uncontrolled, daily volume-weighted average VOC content (in lbs of VOC/ gallon of coating solids, as applied) of all the coatings;

e. the calculated, controlled VOC emission rate, in lbs of VOC/ gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) the daily volume-weighted VOC content recorded in accordance with paragraph (d) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

f. the name and identification of each cleanup material employed;

g. the number of gallons of each cleanup material employed;

h. the uncontrolled VOC content of each cleanup material, in lbs/ gallon;

i. the total uncontrolled VOC emissions from all cleanup materials, in lbs/ day;

j. the total number of hours the emissions unit was in operation;

k. the average hourly uncontrolled VOC emissions from all coatings and cleanup materials, i.e., ((c)+(i))/(j), in lbs/ hr (average);

l. the average hourly controlled VOC emissions from all coatings and cleanup materials, in lbs/ hr, calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

m. the daily average coating usage, in gallons per hour.

n. the daily uncontrolled VOC emissions from all coatings and cleanup materials, i.e., ((c) + (i), in lbs/day);

o. the daily controlled VOC emissions from all coatings and cleanup materials, in lbs/ day, calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

p. beginning after the first 12 calendar months of operation after issuance of this permit, the annual controlled VOC emissions, based upon a rolling, 365-day summation of the daily emissions.

q. the daily volatile organic material usage, in lbs/day;

r. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 365-day summation of the volatile organic material usage figures.

4. During the first 12 months of operation following issuance of this permit, the permittee shall collect and record the following information each month for this emissions unit:

a. the cumulative volatile organic material usage rate in tons; and,

b. the calculated, cumulative controlled VOC emissions from all coatings and cleanup materials, in tons.

5. 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.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all 3-hour blocks of time during which the permanent total enclosure, when the emissions unit was in operation, was not maintained at an average differential pressure of at least 0.007 inch of water column.

2. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average

temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the calculated, controlled VOC emission rate exceeded 70 lbs/hr, and the actual calculated, controlled VOC emission rate for each such day.

5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day emission limitation for VOC, and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative volatile organic material usage levels.

6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day volatile organic material usage limitation, and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative volatile organic material usage levels.

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

8. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

70 lbs/hr of VOC emissions from coating and cleanup materials

Applicable Compliance Method:

VOC from the coatings:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 and the overall control efficiency determined during the most recent

stack test which demonstrated compliance . If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC rule 3745-21-10(C).

VOC from the combustion sources (oven and incinerator):

Compliance shall be demonstrated based upon the maximum total burner capacity of 23.5 mmBtu/hr, an emission factor of 5.5 pounds of VOC per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This VOC emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

100% capture efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 204 of 40 CFR Part 60, Appendix A and the methods and procedures of OAC rule 3745-21-10(C).

c. Emission Limitation:

90% overall control efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and methods and procedures of OAC rule 3745-21-10(C).

d. Emission Limitation:

182.1 tons of VOC/yr as a rolling, 365-day summation of the daily emissions from coating and cleanup materials

Applicable Compliance Method:

Multiply the volatile organic material usage in tons/yr, based upon a rolling, 365-day summation of the volatile organic material usage figures by (1 - the overall control efficiency percentage determined during the most recent stack test demonstrating compliance).

e. Emission Limitation:

1.9 lb/hr of CO

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5 mmBtu/hr, an emission factor of 84 pounds of CO per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This CO emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A.

f. Emission Limitation:

8.3 tpy of CO

Applicable Compliance Method:

The annual emission limitation is based on the hourly CO emission rate for 8760 hrs/yr. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

g. Emission Limitation:

2.3 lbs/hr of NOx

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5 mmBtu, an emission factor of 100 pounds of NOx per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This NOx emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 7 of 40 CFR Part 60, Appendix A.

h. Emission Limitation:

10.07 tpy of NOx

Applicable Compliance Method:

The annual emission limitation is based on the hourly NOx emission rate for 8760 hrs/yr. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

i. Emission Limitation:

0.04 lb/hr of PE

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5mmBtu, an emission factor of 1.9 pounds of particulates per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot. This particulate emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-17-03(B)(9).

j. Emission Limitation:

0.18 tpy of particulate emissions

Applicable Compliance Method:

The annual emission limitation is based on the hourly PE emission rate for 8760 hrs/yr. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

k. Emission Limitation:

0.01 lb/hr of SO2

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 23.5 mmBtu, an emission factor of 0.6 pound of SO2 per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This SO2 emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures

specified in Method 6 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-18-04(E).

l. Emission Limitation:

0.04 tpy of SO2

Applicable Compliance Method:

The annual emission limitation is based on the hourly SO2 emission rate for 8760 hrs/yr. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

m. Emission Limitation:

20% opacity as a six minute average**.**

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

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

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate for K001, but not later than 180 days after initial startup.

b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitation and the capture efficiency and control efficiency requirements for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation: for VOC, Method 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative

method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) If the permittee can demonstrate that the total permanent enclosure (including room dimensions, openings and air flows) did not change from the previous Method 204 test, a new complete test will not be required.

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

VI. Miscellaneous Requirements

1. The permittee is subject to 40 CFR, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart SSSS. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions). Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart A and Subpart SSSS.

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
K001 - 66-inch coil coating line with a 16 mmBtu/hr direct fired natural gas drying oven controlled by a permanent total enclosure and a catalytic incinerator	None	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None