

Facility ID: 0857101741 Issuance type: Title V Preliminary Proposed Permit

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

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

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

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

L001: Cold Cleaner #1  
L002: Cold Cleaner #2  
Z001: Storage Tank #1  
Z002: Storage Tank #2  
Z003: Cold Cleaner #3  
Z004: Misc. Fuel Burning

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0857101741 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Can end manufacturing line No. 5	OAC rule 3745-31-05(A)(3) PTI 08-04311	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 354 pounds per day, excluding cleanup; 5.78 ton per month, including cleanup; and 69.4 tons per year, including cleanup.
	OAC rule 3745-21-09(D)(1)(e)	The VOC content of the coatings employed shall not exceed 3.1 pounds per gallon, excluding water and exempt solvents.  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. Additional Terms and Conditions**

- a. The maximum VOC content of the cleanup material employed in this emissions unit shall not exceed 6.33 lbs VOC/gallon.

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**II. Operational Restrictions**

1. The maximum daily coating usage for this emissions unit shall not exceed 115 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]
2. The maximum annual coating usage for this emissions unit shall not exceed 37,800 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]
3. The maximum monthly cleanup material usage for this emissions unit shall not exceed 300 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]
4. The maximum annual cleanup material usage for this emissions unit shall not exceed 3600 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]

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

1. The permittee shall collect and record the following information each day for the line:
  - a. The name and identification number of each coating employed.
  - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
  - c. The VOC content of each coating employed, as applied, in pounds per gallon.

- d. The number of gallons of each coating employed.
- e. The total number of gallons of all the coatings employed.
- f. The total VOC emission rate for all the coatings employed, in pounds, i.e., the summation of [(c) x (d)] for all coatings employed.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

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

- a. The name and identification number of each cleanup material employed.
- b. The VOC content of each cleanup material employed, in pounds per gallon.
- c. The number of gallons of each cleanup material employed.
- d. The total number of gallons of all the cleanup materials employed.
- e. The total VOC emission rate for all the coatings and cleanup materials employed, in tons, i.e., the sum of the daily VOC emission rates, from Section A.III.1.f, for the calendar month, divided by 2000 lbs/ton + the summation of [A.III.2.b x A.III.2.c] for all cleanup materials, divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

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#### IV. Reporting Requirements

- 1. In accordance with paragraph A.1.c. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Director (the Ohio EPA, Northwest District Office) that include the following information for this emissions unit:
  - a. An identification of each day during which the daily total VOC emission rate exceeded 354 pounds, excluding cleanup, and the actual VOC emission rate for each such day.
  - b. An identification of each month during which the monthly total VOC emission rate exceeded 5.78 tons, including cleanup, and the actual VOC emission rate for each such month.
  - c. An identification of each day during which the daily coating usage rate exceeded 115 gallons, and the actual daily coating usage for each such day.
  - d. An identification of each month during which the monthly cleanup usage rate exceeded 300 gallons, and the actual monthly cleanup usage for each such month.
  - e. An identification of each day during which any coating exceeded the VOC content limitation of 3.1 lbs VOC/gallon of coating, excluding water and exempt solvents, and the actual VOC content for each such coating.
  - f. An identification of each month during which any cleanup material exceeded the VOC content limitation of 6.33 lbs VOC/gallon, and the actual VOC content for each such cleanup material.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

- 2. The permittee shall submit annual reports to the Director (the Ohio EPA, Northwest District Office) which summarize the following information for this emissions unit:

- a. The total actual annual number of gallons of coatings employed.
- b. The total actual annual number of gallons of cleanup materials employed.
- c. The total actual annual VOC emissions, in tons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

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#### V. Testing Requirements

- 1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation-  
354 lbs VOC/day, excluding cleanup  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

- b. Emission Limitation-  
5.78 ton VOC/month, including cleanup
- Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. and Section A.III.2 of this permit.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
- c. Emission Limitation-  
69.4 tons/yr VOC, including cleanup
- Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 and Section A.III.2 of this permit, and shall be the summation of the 12 monthly VOC emission rates, from section A.III.2.e, for the calendar year, divided by 2,000 lbs/ton.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
- d. Emission Limitation-  
3.1 pounds VOC/gallon of coating, excluding water and exempt solvents
- Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit
- USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall 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.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
- e. Emission Limitation-  
6.33 lbs VOC/gallon of cleanup material
- Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.
- Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
- f. Operational Restrictions-  
115 gallons of coatings/day  
37,800 gallons of coatings/yr
- Applicable Compliance Method-  
Compliance with the daily allowable coatings usage restriction shall be based upon the record keeping requirements specified in Section A.III.1 of this permit
- Compliance with the annual allowable coatings usage restriction shall be based upon the record keeping requirements specified in Section A.III.1 of this permit, and shall be the summation of the 365 daily coatings usage rates, from section A.III.1.e, for the calendar year.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
- g. Operational Restrictions-  
300 gallons of cleanup materials/month  
3600 gallons of cleanup materials/yr
- Applicable Compliance Method-  
Compliance with the monthly allowable cleanup materials usage restriction shall be based upon the record keeping requirements specified in Section A.III.2 of this permit
- Compliance with the annual allowable cleanup materials usage restriction shall be based upon the record keeping requirements specified in Section A.III.2 of this permit, and shall be the summation of the 12 monthly cleanup materials usage rates, from section A.III.2.d, for the calendar year.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101741 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

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

- 1. None.

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

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

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

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**II. Operational Restrictions**

- 1. None

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

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101741 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Can end manufacturing line No. 6	OAC rule 3745-31-05(A)(3) PTI 08-04311	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 354 pounds per day, excluding cleanup; 5.78 ton per month, including cleanup; and 69.4 tons per year, including cleanup.
	OAC rule 3745-21-09(D)(1)(e)	The VOC content of the coatings employed shall not exceed 3.1 pounds per gallon, excluding water and exempt solvents. 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. Additional Terms and Conditions**

- a. The maximum VOC content of the cleanup material employed in this emissions unit shall not exceed 6.33 lbs VOC/gallon.

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**II. Operational Restrictions**

1. The maximum daily coating usage for this emissions unit shall not exceed 115 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]
2. The maximum annual coating usage for this emissions unit shall not exceed 37,800 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]
3. The maximum monthly cleanup material usage for this emissions unit shall not exceed 300 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]
4. The maximum annual cleanup material usage for this emissions unit shall not exceed 3600 gallons.  
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04311]

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

1. The permittee shall collect and record the following information each day for the line:
  - a. The name and identification number of each coating employed.
  - b. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon.
  - c. The VOC content of each coating employed, as applied, in pounds per gallon.
  - d. The number of gallons of each coating employed.
  - e. The total number of gallons of all the coatings employed.
  - f. The total VOC emission rate for all the coatings employed, in pounds, i.e., the summation of [(c) x (d)] for all coatings employed.  
[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
2. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each cleanup material employed.

- b. The VOC content of each cleanup material employed, in pounds per gallon.
  - c. The number of gallons of each cleanup material employed.
  - d. The total number of gallons of all the cleanup materials employed.
  - e. The total VOC emission rate for all the coatings and cleanup materials employed, in tons, i.e., the sum of the daily VOC emission rates, from Section A.III.1.f, for the calendar month, divided by 2000 lbs/ton + the summation of [A.III.2.b x A.III.2.c] for all cleanup materials, divided by 2000 lbs/ton.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

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#### IV. Reporting Requirements

1. In accordance with paragraph A.1.c. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Director (the Ohio EPA, Northwest District Office) that include the following information for this emissions unit:
  - a. An identification of each day during which the daily total VOC emission rate exceeded 354 pounds, excluding cleanup, and the actual VOC emission rate for each such day.
  - b. An identification of each month during which the monthly total VOC emission rate exceeded 5.78 tons, including cleanup, and the actual VOC emission rate for each such month.
  - c. An identification of each day during which the daily coating usage rate exceeded 115 gallons, and the actual daily coating usage for each such day.
  - d. An identification of each month during which the monthly cleanup usage rate exceeded 300 gallons, and the actual monthly cleanup usage for each such month.
  - e. An identification of each day during which any coating exceeded the VOC content limitation of 3.1 lbs VOC/gallon of coating, excluding water and exempt solvents, and the actual VOC content for each such coating.
  - f. An identification of each month during which any cleanup material exceeded the VOC content limitation of 6.33 lbs VOC/gallon, and the actual VOC content for each such cleanup material.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
2. The permittee shall submit annual reports to the Director (the Ohio EPA, Northwest District Office) which summarize the following information for this emissions unit:
  - a. The total actual annual number of gallons of coatings employed.
  - b. The total actual annual number of gallons of cleanup materials employed.
  - c. The total actual annual VOC emissions, in tons.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

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#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation-  
354 lbs VOC/day, excluding cleanup  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.  
  
[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
  - b. Emission Limitation-  
5.78 ton VOC/month, including cleanup  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. and Section A.III.2 of this permit.  
  
[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]
  - c. Emission Limitation-  
69.4 tons/yr VOC, including cleanup

## Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 and Section A.III.2 of this permit, and shall be the summation of the 12 monthly VOC emission rates, from section A.III.2.e, for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

- d. Emission Limitation-  
3.1 pounds VOC/gallon of coating, excluding water and exempt solvents

## Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit

USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall 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.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

- e. Emission Limitation-  
6.33 lbs VOC/gallon of cleanup material

## Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

- f. Operational Restrictions-  
115 gallons of coatings/day  
37,800 gallons of coatings/yr

## Applicable Compliance Method-

Compliance with the daily allowable coatings usage restriction shall be based upon the record keeping requirements specified in Section A.III.1 of this permit

Compliance with the annual allowable coatings usage restriction shall be based upon the record keeping requirements specified in Section A.III.1 of this permit, and shall be the summation of the 365 daily coatings usage rates, from section A.III.1.e, for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

- g. Operational Restrictions-  
300 gallons of cleanup materials/month  
3600 gallons of cleanup materials/yr

## Applicable Compliance Method-

Compliance with the monthly allowable cleanup materials usage restriction shall be based upon the record keeping requirements specified in Section A.III.2 of this permit

Compliance with the annual allowable cleanup materials usage restriction shall be based upon the record keeping requirements specified in Section A.III.2 of this permit, and shall be the summation of the 12 monthly cleanup materials usage rates, from section A.III.2.d, for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04311]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857101741 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

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

1. None.

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

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

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

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**II. Operational Restrictions**

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

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**IV. Reporting Requirements**

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**V. Testing Requirements**

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**VI. Miscellaneous Requirements**

1. None