

Facility ID: 1576130634 Issuance type: Title V 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 are located at this facility:

K024 - blank end coating line - water based - A - 30/31;  
K025 - lid line assembly line B - 64;  
Z003 - two-color printing press;  
Z004 - blank line - can end sealing compound coating line, food cans;  
Z005 - blank line - can end sealing compound coating line, food cans;  
Z006 - blank line - can end sealing compound coating line, food cans;  
Z007 - cold cleaners for metal; and  
Z008 - end sealing compound - storage tank.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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- [Go to Part III for Emissions Unit K005](#)
- [Go to Part III for Emissions Unit K006](#)
- [Go to Part III for Emissions Unit K007](#)
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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1576130634 Emissions Unit ID: K003 Issuance type: Title V 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>
Litho Coater C-01 used for over varnish, and interior and exterior basecoating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

**2. Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K003 shall not exceed the value calculated from the following equation:

(a) 
$$Ad = V1 \times L1 \times ((D1-C1)/(D1-L1)) + V2 \times L2 \times ((D2-C2)/(D2-L2)) + \dots + Vn \times Ln \times ((Dn-Cn)/(Dn-Ln))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K003;

C = the VOC content of each coating employed in emissions unit K003 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K003, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K003, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D)(2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K003.

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## II. Operational Restrictions

1. 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.
2. 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.

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## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Measurement units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - 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 of the exhaust gases during the most recent performance 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 performance 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 catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.
5. The permittee shall collect and record the following information for each day for the line and control equipment:
  - a. the name and identification of each coating, as applied;
  - b. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - c. the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - d. the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - e. the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.1.2.a; and

f. the actual daily VOC emissions (Ed) from emissions unit K003, calculated in accordance with the following equation:

$$Ed = V_1 \times C_1 \times (1-F_1) + V_2 \times C_2 \times (1-F_2) + \dots + V_n \times C_n \times (1-F_n)$$

where:

Ed = the actual pounds of VOC emissions for the day;

V = the volume of each coating employed for the day in emissions unit K003, in gallons, excluding water and exempt solvents;

F = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);

i = a subscript denoting a specific coating employed; and

n = the total number of surface coatings employed in emissions unit K003.

6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K003 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.
4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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#### V. Testing Requirements

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.
2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. 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.)
  - b. 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 or an approved alternative test protocol. 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.

c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

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

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

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VI. **Miscellaneous Requirements**

- 1. None

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**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>
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2. **Additional Terms and Conditions**

- 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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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576130634 Emissions Unit ID: K005 Issuance type: Title V 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>
Litho Coater B-33/34 used for over varnish, and interior and exterior basecoating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

2. **Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K005 shall not exceed the value calculated from the following equation:

(a) 
$$Ad = V_1 \times L_1 \times ((D_1 - C_1)/(D_1 - L_1)) + V_2 \times L_2 \times ((D_2 - C_2)/(D_2 - L_2)) + \dots + V_n \times L_n \times ((D_n - C_n)/(D_n - L_n))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K005;

C = the VOC content of each coating employed in emissions unit K005 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K005, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K005, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D) (2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K005.

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II. **Operational Restrictions**

1. 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.
2. 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.

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

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Measurement units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - 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 of the exhaust gases during the most recent performance 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 performance 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 catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.
5. The permittee shall collect and record the following information for each day for the line and control equipment:
  - a. the name and identification of each coating, as applied;
  - b. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - c. the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - d. the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - e. the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.1.2.a; and
  - f. the actual daily VOC emissions (Ed) from emissions unit K005, calculated in accordance with the following equation:

$$Ed = V1 \times C1 \times (1-F1) + V2 \times C2 \times (1-F2) + \dots + Vn \times Cn \times (1-Fn)$$

where:

Ed = the actual pounds of VOC emissions for the day;

V = the volume of each coating employed for the day in emissions unit K005, in gallons, excluding water and exempt solvents;

F = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);

i = a subscript denoting a specific coating employed; and

n = the total number of surface coatings employed in emissions unit K005.

6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K005 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.
4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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#### V. Testing Requirements

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.
2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. 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.)
  - b. 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 or an approved alternative test protocol. 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.
  - c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

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**VI. Miscellaneous Requirements**

- 1. None

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**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>
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**2. Additional Terms and Conditions**

- 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: 1576130634 Issuance type: Title V Proposed Permit

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

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Facility ID: 1576130634 Emissions Unit ID: K006 Issuance type: Title V 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>
Litho Coater B-35/36 used for over varnish, and interior and exterior base coating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

**2. Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K006 shall not exceed the value calculated from the following equation:

$$(a) \quad Ad = V1 \times L1 \times ((D1-C1)/(D1-L1)) + V2 \times L2 \times ((D2-C2)/(D2-L2)) + \dots + Vn \times Ln \times ((Dn-Cn)/(Dn-Ln))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K006;

C = the VOC content of each coating employed in emissions unit K006 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K006, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K006, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D)(2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K006.

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II. **Operational Restrictions**

1. 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.
2. 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.

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

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Measurement units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - 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 of the exhaust gases during the most recent performance 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 performance 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 catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.
5. The permittee shall collect and record the following information for each day for the line and control equipment:
  - a. the name and identification of each coating, as applied;
  - b. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - c. the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - d. the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - e. the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.1.2.a; and
  - f. the actual daily VOC emissions (Ed) from emissions unit K006, calculated in accordance with the following equation:
 
$$Ed = V1 \times C1 \times (1-F1) + V2 \times C2 \times (1-F2) + \dots + Vn \times Cn \times (1-Fn)$$
 where:  
 Ed = the actual pounds of VOC emissions for the day;  
 V = the volume of each coating employed for the day in emissions unit K006, in gallons, excluding water and exempt solvents;  
 F = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);  
 i = a subscript denoting a specific coating employed; and  
 n = the total number of surface coatings employed in emissions unit K006.
6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify the following:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K006 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.
4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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**V. Testing Requirements**

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.
2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. 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.)
  - b. 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 or an approved alternative test protocol. 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.
  - c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

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

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576130634 Emissions Unit ID: K006 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

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

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Facility ID: 1576130634 Emissions Unit ID: K007 Issuance type: Title V 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>
Litho Coater B-37/38 used for over varnish, and interior and exterior basecoating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

#### 2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K007 shall not exceed the value calculated from the following equation:

$$(a) \quad Ad = V_1 \times L_1 \times ((D_1 - C_1)/(D_1 - L_1)) + V_2 \times L_2 \times ((D_2 - C_2)/(D_2 - L_2)) + \dots + V_n \times L_n \times ((D_n - C_n)/(D_n - L_n))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K007;

C = the VOC content of each coating employed in emissions unit K007 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K007, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K007, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D) (2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K007.

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#### II. Operational Restrictions

1. 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.
2. 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.

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

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

2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - 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 of the exhaust gases during the most recent performance 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 performance 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 catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.
5. The permittee shall collect and record the following information for each day for the line and control equipment:
  - a. the name and identification of each coating, as applied;
  - b. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - c. the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - d. the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - e. the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.1.2.a; and
  - f. the actual daily VOC emissions (Ed) from emissions unit K007, calculated in accordance with the following equation:  

$$Ed = V1 \times C1 \times (1-F1) + V2 \times C2 \times (1-F2) + \dots + Vn \times Cn \times (1-Fn)$$
 where:  
 Ed = the actual pounds of VOC emissions for the day;  
 V = the volume of each coating employed for the day in emissions unit K007, in gallons, excluding water and exempt solvents;  
 F = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);  
 i = a subscript denoting a specific coating employed; and  
 n = the total number of surface coatings employed in emissions unit K007.
6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and

- 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K007 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.
4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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**V. Testing Requirements**

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.
2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. 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.)
  - b. 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 or an approved alternative test protocol. 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.
  - c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.
 

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

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K007 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

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: 1576130634 Issuance type: Title V Proposed Permit

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

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Facility ID: 1576130634 Emissions Unit ID: K008 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-02. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K008 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

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: 1576130634 Issuance type: Title V Proposed Permit

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

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Facility ID: 1576130634 Emissions Unit ID: K010 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-03. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
    - 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
    - Applicable Compliance Method:
      - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
      - In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a

coating/cleanup material expressed as pounds of VOC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K010 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

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: 1576130634 Issuance type: Title V Proposed Permit

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

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Facility ID: 1576130634 Emissions Unit ID: K011 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-04. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.
		See A.II.1 below.

2. **Additional Terms and Conditions**
  - (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K011 Issuance type: Title V 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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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1576130634 Emissions Unit ID: K012 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-05. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	See A.II.1 below.
		3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

2. **Additional Terms and Conditions**
  - (a) None

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II. **Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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IV. **Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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V. **Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K012 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

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: 1576130634 Emissions Unit ID: K013 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-06. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

- 1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
- 2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
    - 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
  - Applicable Compliance Method:
    - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
    - In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 1576130634 Emissions Unit ID: K013 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

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: 1576130634 Issuance type: Title V Proposed Permit

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

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Facility ID: 1576130634 Emissions Unit ID: K014 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as C-07. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

- 1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

- 1. The permittee shall collect and record the following information on a monthly basis for the coating line:

- a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
- 2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.\*\*\*

**IV. Reporting Requirements**

- 1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

- 1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
    - 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
  - Applicable Compliance Method:
    - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
    - In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 1576130634 Emissions Unit ID: K014 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

- 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: 1576130634 Issuance type: Title V Proposed Permit**

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

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**Facility ID: 1576130634 Emissions Unit ID: K016 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-09. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

- 1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission

limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 1576130634 Emissions Unit ID: K016 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

- 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: 1576130634 Emissions Unit ID: K017 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-24. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

- 2. **Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
- the name and identification number of each coating, as applied; and
  - the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
- Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K017 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

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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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576130634 Emissions Unit ID: K018 Issuance type: Title V 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>
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Blank line can end sealing compound coating OAC rule 3745-21-09(D)(1)(e)  
line designated as B-25. Emissions unit is

3.7 pounds of volatile organic compounds (VOC) per  
gallon of coating, excluding water and exempt solvents

uncontrolled.

OAC rule 3745-21-09(D)(2)(e)

See A.II.1 below.

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

See A.II.1 below.

2. **Additional Terms and Conditions**

(a) None

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\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.\*\*\*

II. **Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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IV. **Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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V. **Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K018 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

- 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: 1576130634 Emissions Unit ID: K019 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-26. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

2. **Additional Terms and Conditions**
  - (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K019 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

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: 1576130634 Issuance type: Title V Proposed Permit

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Facility ID: 1576130634 Emissions Unit ID: K020 Issuance type: Title V 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>
Blank line can end sealing compound coating line designated as B-99. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
		See A.II.1 below.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

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

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576130634 Emissions Unit ID: K020 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

- 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: 1576130634 Issuance type: Title V Proposed Permit

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

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Facility ID: 1576130634 Emissions Unit ID: K021 Issuance type: Title V 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>
B-28 blank line can end sealing compound coating line; Dewey and Almy, Model 800 lining machine and Fleetwood packing station. Coating is applied using a 40 psi pressurized application system. The emissions unit is uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 15-0437)	The total emissions of volatile organic compounds (VOC) from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.
	OAC rule 3745-21-09(D)(1)(e)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D). 3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09 (D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents  See A.II.1 below.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
2. The permittee shall limit the total use of coating materials in emissions units K021 and K022, combined, to 16,819 gallons per year.

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

1. The permittee shall collect and record the following information on a monthly basis for emissions units K021 and K022:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating employed;
  - d. the name and identification number of each cleanup material employed;
  - e. the VOC content of each cleanup material employed;
  - f. the number of gallons of each cleanup material employed; and
  - g. the total VOC emissions from all coatings and cleanup materials employed, in tons.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.
3. The permittee shall maintain records of the calculated annual VOC emissions from this emissions unit, in tpy. This value shall be calculated by summing the monthly total VOC emission values for the calendar year.
4. The permittee also shall maintain records of the total number of gallons of coatings used per year.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports, by January 31 of each year, that identify the following for the previous calendar year:
  - a. the total VOC emissions from emissions units K021 and K022; and
  - b. the total gallons of coatings employed for emissions units K021 and K022.

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**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:
 

3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - b. Emission Limitation:
 

The total emissions of VOC from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.3.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K021 Issuance type: Title V 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.

**Applicable Emissions Limitations/Control**

**Operations, Property, and/or Equipment   Applicable Rules/Requirements   Measures**

**2. Additional Terms and Conditions**

- 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: 1576130634 Emissions Unit ID: K022 Issuance type: Title V 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.

<b><u>Operations, Property, and/or Equipment</u></b>	<b><u>Applicable Rules/Requirements</u></b>	<b><u>Applicable Emissions Limitations/Control Measures</u></b>
B-29 blank line can end sealing compound coating line; Dewey and Almy, Model 800 lining machine and Fleetwood packing station. Coating is applied using a 40 psi pressurized application system. The emissions unit is uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 15-0437)	The total emissions of volatile organic compounds (VOC) from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.
	OAC rule 3745-21-09(D)(1)(e)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D). 3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents

OAC rule 3745-21-09 (D)(2)(e)

See A.II.1 below.

3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents

See A.II.1 below.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
2. The permittee shall limit the total use of coating materials in emissions units K021 and K022, combined, to 16,819 gallons per year.

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

1. The permittee shall collect and record the following information on a monthly basis for emissions units K021 and K022:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating employed;
  - d. the name and identification number of each cleanup material employed;
  - e. the VOC content of each cleanup material employed;
  - f. the number of gallons of each cleanup material employed; and
  - g. the total VOC emissions from all coatings and cleanup materials employed, in tons.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.
3. The permittee shall maintain records of the calculated annual VOC emissions from this emissions unit, in tpy. This value shall be calculated by summing the monthly total VOC emission values for the calendar year.
4. The permittee also shall maintain records of the total number of gallons of coatings used per year.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports, by January 31 of each year, that identify the following for the previous calendar year:
  - a. the total VOC emissions from emissions units K021 and K022; and
  - b. the total gallons of coatings employed for emissions units K021 and K022.

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**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:
 

3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

b. Emission Limitation:

The total emissions of VOC from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.3.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576130634 Emissions Unit ID: K022 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

- 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: 1576130634 Emissions Unit ID: K023 Issuance type: Title V 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>
This process is a two-piece food can process using a compound coating to seal the ends. The process designation is C-10. Coating is accomplished using a Dewey & Almy Model 800 lining machine. The emissions unit utilizes a Nordson catalytic incinerator to reduce VOC emissions. The process includes an electric furnace.	OAC rule 3745-31-05(A)(3) (PTI 15-1176)	2.2 lbs/hr of volatile organic compounds (VOC) 9.64 tpy of VOC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D).  See A.I.2.a below.
	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents  See A.II.1 below.

2. **Additional Terms and Conditions**

- a. These emission limitations include VOC emissions resulting from the use of both cleanup and coating materials.
- b. The catalytic incinerator shall operate with an overall control efficiency of at least 76.5%.

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II. **Operational Restrictions**

- 1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
- 2. The permittee shall employ no more than 1,752 gallons of cleanup materials per year in this emissions unit.
- 3. The permittee shall employ no more than 19,272 gallons of coating materials per year in this emissions unit.
- 4. The permittee shall not employ any photochemically reactive material for cleanup in this emissions unit.
- 5. 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.
- 6. 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 emissions test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall maintain records of the following during the operation of this emissions unit:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the name and company identification of each coating (as applied) and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon as applied;
  - d. the total uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit in tons of VOC for the month;
  - e. documentation as to whether or not each cleanup material employed is a photochemically reactive material; and
  - f. the number of operating hours for this emissions unit.

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.
4. The permittee shall maintain records of the total annual number of gallons of all coating materials used for this emissions unit annually.
5. The permittee shall maintain records of the total number of gallons of all cleanup materials used for this emissions unit annually.
6. The permittee shall maintain records of the annual controlled VOC emission rate for this emissions unit. This value is calculated by multiplying the sum of the total monthly uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit for the calendar year by the factor of one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.
7. The permittee shall maintain monthly records of the controlled average hourly VOC emission rate for this emissions unit. This VOC emission rate shall be determined by dividing each monthly uncontrolled VOC emission value by the number of hours this emissions unit operated during the month and multiplying this number by one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.
8. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
9. The permittee shall maintain in their files a detailed and signed catalyst evaluation report from the testing conducted. The report shall provide the name and address of the testing company, date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future capability to meet the control and capture efficiencies required by this permit based on their expertise and the test report data.

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**IV. Reporting Requirements**

1. The permittee shall notify the Canton 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 be sent to the Canton local air agency within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly records showing an exceedance of the 2.2 lbs/hr limitation for VOC and/or showing the use of any cleanup material that is a photochemically reactive material.
3. The permittee shall submit annual reports by January 31 of each year that identify the following for this emissions unit for the previous calendar year:
  - a. the tons of VOC emissions;
  - b. the gallons of cleanup materials used; and
  - c. the gallons of coatings used.
4. The permittee shall submit quarterly temperature deviation reports that identify the following:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
5. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
6. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - b. Emission Limitation:
 

2.2 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.
  - c. Emission Limitation:
 

9.64 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6.
  - d. Emission Limitation:
 

The catalytic incinerator shall operate with an overall control efficiency of at least 76.5%.

## Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control efficiency.

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 12 months following the effective date of this permit and between 3.0 and 3.5 years after the initial compliance test date.

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

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

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton 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.)

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 or an approved alternative test protocol. 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 Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544 within 30 days following completion of the tests.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576130634 Emissions Unit ID: K023 Issuance type: Title V 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. **Additional Terms and Conditions**
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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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576130634 Emissions Unit ID: K026 Issuance type: Title V 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>
This process is a two- and three-piece food can end seal compound coating line designated B-73. The lining machine is a Dewey and Almy Model 800 system complete with a fossil, fuel-fired drying	OAC rule 3745-31-05(A)(3) (PTI 15-859)	2.33 lbs/hr of volatile organic compounds (VOC) 53.6 lbs/day of VOC 8 tpy of VOC
		The requirements of this rule also include compliance

oven. The emissions unit utilizes a CSD-D-300 catalytic incinerator to reduce VOC emissions.

with the requirements of OAC rule 3745-21-09(D).

See A.I.2.a below.

3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents

OAC rule 3745-21-09(D)(1)(e) and (D)(2)(e) See A.II.1 below.

**2. Additional Terms and Conditions**

- a. These emission limitations include VOC emissions resulting from the use of both cleanup and coating materials.
- b. The catalytic incinerator shall operate with an overall control efficiency of at least 71.3%. The total overall efficiency is the control efficiency divided by 100 times the capture efficiency divided by 100.
- c. The permittee shall operate in accordance with the Preventative Maintenance and Malfunction Plan (PMMAP) for this emissions unit as submitted to the Canton local air agency on September 5, 2001. The PMMAP was approved on September 21, 2001 by the Canton local air agency.

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
2. The permittee shall restrict the operation of emissions unit K026 to less than 23 hrs/day and 6,900 hrs/yr of production for this emissions unit. The permittee shall also restrict operation to coating 1,104,000 can ends per day and 331,200,000 can ends per year for this emissions unit.
3. The permittee shall not employ any photochemically reactive materials for cleanup in this emissions unit.
4. The permittee shall employ no more than 690 gallons of cleanup materials each year in this emissions unit.
5. 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.
6. 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 emissions test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall maintain records of the following during the operation of this emissions unit:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the name and company identification of each coating (as applied) and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon as applied;
  - d. the total uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit in tons of VOC for the month; and
  - e. documentation as to whether or not each cleanup material employed is a photochemically reactive

material.

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

4. The permittee shall maintain records of the number of operating hours per day, the number of operating days per year and the number of operating hours per year.
5. The permittee shall maintain records of the number of can ends coated per day and per year for this emissions unit.
6. The permittee shall maintain monthly records of the average controlled hourly VOC emission rate for this emissions unit. This rate shall be determined by dividing the uncontrolled VOC emissions by the number of operating hours in a month and multiplying this number by one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.
7. The permittee shall maintain monthly records of the average controlled daily VOC emission rate for this emissions unit. This rate shall be determined by multiplying the average controlled hourly VOC emission rate by the number of operating hours per day.
8. The permittee shall maintain records of the annual controlled VOC emission rate for this emissions unit. This value is calculated by multiplying the sum of the total monthly uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit for the calendar year by the factor of one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.
9. The permittee shall maintain records of the total gallons of cleanup material used each year.
10. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
11. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.
12. The permittee shall maintain records as specified within the PMMAP for this emissions unit as submitted to the Canton LAA on Sept. 5, 2001 and approved on Sept. 21, 2001 for the life of the emissions unit.

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#### IV. Reporting Requirements

1. The permittee shall notify the Canton 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 be sent to the Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly records showing an exceedance of the following limitations:
  - a. 2.33 lbs/hr and/or 53.6 lbs/day of VOC; and
  - b. 23 operating hrs/day and/or 1,104,000 can ends coated per day.
3. The permittee shall submit annual reports by January 31 of each year that identify the following for the previous calendar year:
  - a. the operating hours per year;
  - b. the number of can ends coated per year;
  - c. the tons of VOC emissions per year; and
  - d. the gallons of cleanup materials employed.
4. The permittee shall submit quarterly temperature deviation reports that identify the following:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

5. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
6. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly records showing the use of any cleanup material that is a photochemically reactive material.
7. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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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:  
2.33 lbs/hr of VOC  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.  
Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.
  - b. Emission Limitation:  
53.6 lbs/day of VOC  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.
  - c. Emission Limitation:  
The catalytic incinerator shall operate with an overall control efficiency of at least 71.3%.  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control efficiency.
  - d. Emission Limitation:  
3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.  
In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - e. Emission Limitation:  
9.64 tpy of VOC  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.
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 12 months following the effective date of this permit and between 3.0 and 3.5 years after the initial compliance test date.

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

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

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton 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.)

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 or an approved alternative test protocol. 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 Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544 within 30 days following completion of the tests.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K026 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

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: 1576130634 Emissions Unit ID: K027 Issuance type: Title V 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>
Process C-02 is a litho coating line for interior and exterior basecoat and overvarnish coating of three-piece cans. The process consists of a Dexter sheet feeder, a 12-inch Wagner Spot Coater, one natural, gas-fired Feco 140 ft. D.E.F. curing oven, and one CSM System, Torvex Model 70 catalytic incinerator.	OAC rule 3745-31-05(A)(3) (PTI 15-1127, Synthetic Minor)	16 lbs/hr of volatile organic compounds (VOC)  See A.I.2.a and A.I.2.b below.  0.51 lb/hr of nitrogen oxides (NOx)  See A.I.2.d below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(B)(6).  See A.I.2.c below.

OAC rule 3745-21-09(B)(6)

- 2. **Additional Terms and Conditions**

- a. The VOC emissions limitation, in lbs/hr, includes all VOC emissions from coatings and cleanup materials.
- b. The total tons of VOC contained in the coatings and cleanup materials employed by this emissions unit shall not exceed 200 tons during any rolling, 365-day period and 16.6 tons in any month.
- c. The catalytic incinerator shall provide an overall control efficiency of at least eighty-one percent (81%), by weight, and a control destruction efficiency of not less than ninety percent (90%), by weight, for the VOC emissions vented to the control system.
- d. The NOx emissions limitation, in lb/hr, represents emissions from fuel combustion in the oven. It does not represent emissions generated by the catalytic incinerator.

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#### II. Operational Restrictions

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

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

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall maintain records of the following during the operation of the emissions unit:
  - 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 is 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;
  - 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 difference during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - c. a daily log or record of downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit (the log shall include any operational problems and/or malfunctions which reduce the average control efficiency, causes for those episodes and corrective actions to resolve the problem).
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in their files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future capability to meet the control and capture efficiencies required by this permit based on their expertise and the test report data.
5. The permittee shall maintain daily records of the following information for the emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in lbs VOC/gallon, as applied;
  - d. the number of operating hours for this emissions unit;

- e. the total calculated, uncontrolled VOC emissions from all coatings and cleanup materials in pounds or tons;
  - f. the total calculated, controlled VOC emissions in pounds or tons from all coatings and cleanup materials (This value is calculated by multiplying the total calculated, uncontrolled pounds of VOC emission rate by a factor of one minus the overall control efficiency/100. The overall control efficiency shall be from the most recently approved performance test demonstrating compliance with the control efficiency limits in this permit.);
  - g. the total calculated tons of VOC contained in all coatings and cleanup materials employed during any rolling, 365-day period for this emissions unit; and
  - h. the controlled average hourly VOC emission rate for this emissions unit. (This VOC emission rate shall be determined by dividing each daily uncontrolled VOC emission value by the number of hours this emissions unit operated during the day and multiplying this number by one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance with the control efficiency limits in this permit.)
6. The permittee shall maintain monthly records of the total tons of VOC contained in all coatings and cleanup materials employed during any month in this emissions unit.
  7. The permittee shall monitor and record the number of cubic feet of gas employed by the oven on a daily basis and the number of hours the catalytic incinerator operated per day.
  8. The permittee shall maintain daily records of the calculated hourly NOx emission rate. This value can be calculated by multiplying the NOx emission factor of 94 pounds of NOx/mmscf by the actual cubic feet of natural gas burned per day in the catalytic incinerator, and then dividing by the number of actual operating hours in the day.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - 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 of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any rolling, 365-day period when the VOC emissions from all coatings and cleanup materials exceeded 200 tons of VOC.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any month when the VOC emissions from all coatings and cleanup materials exceeded 16.6 tons of VOC.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any day when the calculated, controlled VOC emission rate exceeded 16 lbs/hr of VOC.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any day when the calculated, controlled NOx emission rate exceeded 0.51 lb/hr of NOx.
6. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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#### V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

16 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.
  - b. Emission Limitation:

200 tons of VOC contained in all coatings and cleanup materials employed during any rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

c. Emission Limitation:

16.6 tons of VOC contained in all coatings and cleanup materials employed during any month

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

d. Emission Limitation:

The catalytic incinerator shall provide an overall control efficiency of at least eighty-one percent (81%), by weight, and a control destruction efficiency of not less than ninety percent (90%), by weight, for the VOC emissions vented to the control system.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control efficiency.

e. Emission Limitation:

0.51 lb/hr of NOx

Applicable Compliance Method:

Multiply the NOx emission factor of 94 pounds of NOx/mmscf by the actual cubic feet of natural gas burned per day in the catalytic incinerator, and then divide by the number of actual operating hours in the day. See the record keeping requirements specified in section A.III.8.

The NOx emission factor was obtained from AP-42, 5th Edition, Volume 1, "Stationary Paint and Area Sources", Chapter 1, Section 1.4 "Natural Gas Combustion (Supplement D)", Table 1-4.1, dated July, 1998.

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 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial date of testing.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC specified in section A.1.1 and the control efficiency and overall control efficiency limitations for VOC specified in section A.1.2.c.

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

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The capture efficiency shall be determined using Methods 204 through 204 F, 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.)

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 or an approved alternative test protocol. 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 Canton local air agency. 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 tests and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emissions test.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

3. If required, the permittee shall demonstrate compliance with any emission limitation or restriction in this permit in accordance with the methods and procedures specified in OAC rule 3745-15-04.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K027 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

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: 1576130634 Emissions Unit ID: K029 Issuance type: Title V 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>
Two-piece and three-piece can blank end sealing compound coating line designated as A-11. The process consists of one Dewey and Almy Model 800 lining machine with a low pressure pumping applicator. The system is uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 15-1216)	7.68 lbs/hr of volatile organic compounds (VOC)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D).  See A.I.2.a below.  3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(D)(1)(e) and (D)(2)(e)	See A.II.1 below.

2. **Additional Terms and Conditions**

- a. This hourly emission limitation includes VOC emissions resulting from the use of both coatings and cleanup materials.

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II. **Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
2. The permittee shall not employ photochemically reactive materials for cleanup.
3. This emissions unit shall only coat ends for food cans. No beverage can ends shall be coated. Beverage can means any two-piece steel or aluminum container in which soft drink or beer, including malt liquor, are packaged. The definition does not include containers in which fruit or vegetable juices are packaged.
4. The permittee shall employ no more than 13,730 gallons of coatings and 690 gallons of cleanup materials each year in this emissions unit.

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

1. The permittee shall maintain monthly records which list the following information for this emissions unit:
  - a. the name and company identification of each coating (as applied) and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon, as

applied;

- d. the total uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit, in tons of VOC for the month;
- e. documentation as to whether or not each cleanup material employed is a photochemically reactive material;
- f. the number of operating hours for this emissions unit; and
- g. the average hourly uncontrolled VOC emission rate, in lbs/hr.

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

- 2. The permittee shall maintain records of the number of can ends coated on a monthly basis (i.e., food vs. beverage).
- 3. The permittee shall maintain records of the total number of gallons of coatings employed in this emissions unit annually.
- 4. The permittee shall maintain records of the total number of gallons of cleanup materials employed in this emissions unit annually.

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#### IV. Reporting Requirements

- 1. The permittee shall notify the Canton 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 be sent to the Canton local air agency within 30 days following the end of the calendar month.
- 2. The permittee shall submit annual reports by January 31 of each year that identify the number of gallons of cleanup materials and the number of gallons of coatings employed at this emissions unit during the previous calendar year.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the 7.68 lbs/hr of VOC emission limitation;
  - b. the use of any photochemically reactive materials for cleanup; and
  - c. the coating of any beverage can ends.

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#### 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:
    - 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents
    - Applicable Compliance Method:
      - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
      - In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - b. Emission Limitation:
    - 7.68 lbs/hr of VOC
    - Applicable Compliance Method:
      - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
      - Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.
- 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 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for VOC, 40 CFR Part 60, Appendix A, Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

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

Personnel from the Canton 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 Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544 within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576130634 Emissions Unit ID: K029 Issuance type: Title V 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>
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2. **Additional Terms and Conditions**

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

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Facility ID: 1576130634 Emissions Unit ID: K030 Issuance type: Title V 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>
This process is a two- and three- piece food can process using a compound coating to seal the ends. The process designation is B-65. Coating is accomplished using a Dewey & Almy Model 800 lining machine. The emissions unit utilizes a Nordson catalytic incinerator to reduce VOC emissions. The process includes an electric furnace.	OAC rule 3745-31-05(A)(3) (PTI 15-1302)	36 lbs/day of volatile organic compounds (VOC) 0.468 ton/month of VOC
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D).  See A.I.2.a below.
		3.7 pounds of VOC/gallon of coating (excluding water and exempt solvents)
	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of VOC/gallon of coating (excluding water and exempt solvents)
	OAC rule 3745-21-09(D)(2)(e)	

**2. Additional Terms and Conditions**

- a. The emission limitations include VOC emissions resulting from both coatings and cleanup materials employed at this emissions unit.
- b. The emissions from this emissions unit shall be vented to a catalytic incinerator that shall have an overall control efficiency of at least 67.5%, by weight.

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**II. Operational Restrictions**

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
2. The permittee shall not employ any photochemically reactive materials in this emissions unit.
3. 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.
4. 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 emissions test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall continuously monitor the temperature of the inlet and exhaust gases of the catalytic incinerator serving this emissions unit and record the following:
  - 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 of the exhaust gases during the most recent performance 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 performance test that demonstrated the emissions unit was in compliance; and
  - c. a log or record of downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in their files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future capability to meet the overall control efficiency of 67.5% based on their expertise and the test report data.
5. The permittee shall maintain monthly records which list the following information for this emissions unit:
  - a. the name and company identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating (as applied) and cleanup material employed, in pounds of VOC per gallon of coating as applied;
  - d. documentation as to whether or not each cleanup material employed is a photochemically reactive material;
  - e. the total uncontrolled VOC emissions from all coatings and cleanup materials employed for this emissions unit, in tons and pounds; and
  - f. the number of days of operation during the month.

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.
6. The permittee shall record and maintain records of the total controlled VOC emission rate in lbs VOC/day and lbs VOC/month. These values shall be calculated as follows:
  - a. for lbs VOC/day, multiply the total uncontrolled calculated VOC emissions from all coatings and cleanup materials employed monthly for this emissions unit, in pounds, by a factor of (1-overall control

efficiency/100) and divide this number by the number of operating days in the month; and

b. for tons VOC/month, multiply the total uncontrolled VOC emissions from all coatings and cleanup materials employed monthly for this emissions unit, in tons, by a factor of (1-overall control efficiency/100).

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly temperature deviation reports as follows:
  - a. 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 of the bed during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. 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.
2. The permittee shall notify the Canton 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 Canton local air agency within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
  - a. any exceedance of the emission limitations of 36 lbs/day and 0.468 ton/month of VOC; and
  - b. any use of photochemically reactive materials for cleanup.
4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

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#### V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

36 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.5 and A.III.6.
  - b. Emission Limitation:
 

0.468 ton/month of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.5 and A.III.6.
  - c. Emission Limitation:
 

3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - d. Emission Limitation:
 

The catalytic incinerator shall operate with an overall control efficiency of at least 67.5%, by weight.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control

efficiency.

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 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack test date.
  - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for VOC specified in section A.I.2.b.
  - c. The test methods which must be employed to demonstrate compliance with the overall control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
  - 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.)
  - 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 or an approved alternative test protocol. 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 Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit's 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 may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576130634 Emissions Unit ID: K030 Issuance type: Title V 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>
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**2. Additional Terms and Conditions**

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