



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/18/2011

Certified Mail

Mr. Brian Cromie
REXAM Beverage Can Co
10444 Waterville
Whitehouse, OH 43571

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448002007
Permit Number: P0108645
Permit Type: Administrative Modification
County: Lucas

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
TDES; Michigan; Indiana; Canada



FINAL

Division of Air Pollution Control
Permit-to-Install
for
REXAM Beverage Can Co

Facility ID:	0448002007
Permit Number:	P0108645
Permit Type:	Administrative Modification
Issued:	10/18/2011
Effective:	10/18/2011



Division of Air Pollution Control
Permit-to-Install
for
REXAM Beverage Can Co

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Authorization

Facility ID: 0448002007
Facility Description: Metal beverage can manufacturing facility
Application Number(s): M0001372
Permit Number: P0108645
Permit Description: This administrative modification will update the SIP changes, replacing OAC rule 3745-17-11(B) with OAC rule 3745-17-11(C). The modification will also change some of the monitoring, record keeping, and reporting requirements to more closely match the Ohio EPA permit terms and conditions library.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 10/18/2011
Effective Date: 10/18/2011

This document constitutes issuance to:

REXAM Beverage Can Co
10444 Waterville Swanton Rd.
Whitehouse, OH 43571

of a Permit-to-Install for the emissions unit(s) identified on the following page.

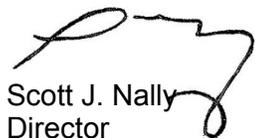
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108645

Permit Description: This administrative modification will update the SIP changes, replacing OAC rule 3745-17-11(B) with OAC rule 3745-17-11(C). The modification will also change some of the monitoring, record keeping, and reporting requirements to more closely match the Ohio EPA permit terms and conditions library.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K010
Company Equipment ID:	Modified Can Manufacturing Line
Superseded Permit Number:	P0106008
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K011
Company Equipment ID:	Modified Can Manufacturing Line
Superseded Permit Number:	P0106008
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K012
Company Equipment ID:	Can Manufacturing Line
Superseded Permit Number:	P0106008
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K015
Company Equipment ID:	K015
Superseded Permit Number:	P0106008
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission

limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently

removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Facility-wide emissions shall not exceed 9.9 tons of individual hazardous air pollutant (HAP) emissions and 24.9 tons of total combined HAP emissions per rolling, 12-month period.
 - a) Facility-wide emissions shall be determined from a summation of monthly emissions from the following emission units: B001 – B003, K009 – K012, K015, and all emissions units that are exempt, permit by rule (OAC rule 3745-31-03), or de minimis (OAC rule 3745-15-05). The emissions from the previous eleven months shall be added to this amount.
 - b) Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Cans in 40 CFR Part 63 Subpart KKKK and for Industrial, Commercial and Institutional Boilers and Process Heaters in 40 CFR Part 63 Subpart DDDDD are not applicable.
 - c) A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Toledo Division of Environmental Services.
3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart WW: K010 – K012. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.

C. Emissions Unit Terms and Conditions

1. K010, Modified Can Manufacturing Line 3

Operations, Property and/or Equipment Description:

Modified beverage can production line #3 for 24 oz. size cans – consisting of can making equipment (cupper, body makers and trimmers), a continuous motion printer with 3.00 mmBtu/hr printer pin oven and an interior body sprayer with a 3.55 mmBtu/hr inside bake oven; both the continuous motion printer oven and the inside bake oven to be controlled with a 7.3 mmBtu/hr regenerative thermal oxidizer (RTO).

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 50.21 tons per rolling, 12-month period.</p> <p>See b)(2)a. and c)(2).</p>
b.	ORC 3704.03(T)	<p>VOC emissions shall not exceed 14.04 pounds per hour.</p> <p>See b)(2)e. and b)(2)f.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Sulfur dioxide (SO₂) emissions shall not exceed 0.01 pound per hour and 0.01 ton per year.</p> <p>Nitrogen Oxides (NO_x) emissions shall not exceed 0.64 pound per hour and 2.79 tons per year.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.54 pound per hour and 2.38 tons per year.</p> <p>Particulate matter of less than 10 microns in diameter (PM₁₀) shall not exceed 0.33</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pound per hour and 1.21 tons per year. Filterable particulate (PE) emissions shall not exceed 0.29 pound per hour and 1.05 tons per year. See b)(2)h.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)i.
e.	OAC rule 3745-17-07(A)(1)	Visible emissions from stacks serving this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
f.	OAC rule 3745-17-11(C)	See b)(2)j.
g.	OAC rule 3745-18-06(A)	See b)(2)c.
h.	40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496) [In accordance with 40 CFR 60.492, this emissions unit is a two-piece beverage can surface coating line with an over varnish and inside spray coating operation subject to the emission limitations specified in this section.]	See b)(2)b. and b)(2)d.
i.	OAC rule 3745-21-09(D)(1)	See b)(2)b.
j.	40 CFR Part 60 Subpart A (40 CFR 60.1 – 60.19)	See b)(2)g.

(2) Additional Terms and Conditions

- a. The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.
- b. The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- c. OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat

content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

- d. This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- e. Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:
 - inks: 1.81 pounds per gallon of coating excluding water and exempt solvents;
 - over varnish: 2.1 pounds per gallon of coating excluding water and exempt solvents;
2.9 pounds per gallon of coating solids;
 - exterior bottom end varnish: 2.1 pounds per gallon of coating excluding water and exempt solvents;
2.9 pounds per gallon of coating solids;
 - inside spray: 3.5 pounds per gallon of coating excluding water and exempt solvents; and
6.8 pounds per gallon of coating solids.
- f. For the regenerative thermal oxidizer (RTO), the capture efficiency shall be a minimum of 72% and the destructive efficiency shall be a minimum of 95% for VOC emissions from the continuous motion printer oven and inside body spray oven.
- g. 40 CFR Part 60 Subpart A provides applicability, provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet

been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- i. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, NO_x, PE, PM₁₀, and CO emissions from this air contaminant source since the uncontrolled potential to emit for SO₂, NO_x, PE, PM₁₀ and CO is less than 10 tons per year.

- j. Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(l) of this rule shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices (particulate filter system) and follow the work practice standards as stated in (C)(2) of this rule.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.
- (2) Coating usage shall not exceed the following levels based upon a rolling, 12-month summation of the usage rates:

Over varnish:	74,435 gallons;
Bottom varnish:	4,120 gallons;
Inside spray:	186,095 gallons; and
Inks:	7,188 gallons.
- (3) The permittee shall not operate the body making equipment when the oil mist collection system is not in operation.
- (4) See 40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496).
- (5) The permittee shall operate the particular filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the operating manual(s) and sound engineering judgment.
- (6) In the event the particulate filter system is not operating in accordance with the operating manual(s) or sound engineering judgment, the control device shall be expeditiously repaired or otherwise returned to documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas in this emissions unit; the permittee shall maintain a record of the type and quantity of fuel.
- (2) The permittee shall collect and record the following information each month for the line:
 - a. For the coatings:
 - i. the name and identification number of each coating (i.e., over varnish, bottom varnish, or inside spray coating), as applied;
 - ii. the volume of each coating employed, in gallons;
 - iii. the VOC content of each coating, in pounds of VOC per gallon of coating;
 - iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents;
 - v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied;
 - vi. the uncontrolled VOC emissions from all coatings applied, i.e., "ii." x "iii.";
 - vii. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
 - viii. the total VOC emissions, both controlled and uncontrolled, from all coating applied, i.e., the summation of "vi." for all uncontrolled coatings plus the summation of "vi." x "vii." for the coatings controlled by the thermal oxidizer.

Note: The inside spray, over varnish, and the bottom varnish coating emissions are currently controlled by the thermal oxidizer.

- b. For the inks:
 - i. the name and identification number of each ink, as applied;
 - ii. the volume (and mass) of each ink employed, in gallons (and pounds);
 - iii. the VOC content of each ink, in pounds of VOC per gallon (and pounds) of ink;
 - iv. the VOC content of each ink, in pounds of VOC per gallon of ink excluding water and exempt solvents;
 - v. the uncontrolled VOC emissions from all inks applied, i.e., "ii." x "iii.";
 - vi. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and

- vii. the total VOC emissions from all inks applied, i.e., the summation of "v." for all uncontrolled inks plus the summation of "v." x "vi." for all inks controlled by the thermal oxidizer.

Note: The ink emissions are currently controlled by the thermal oxidizer.

- c. the rolling 12-month summation of VOC emissions from all coatings and inks employed, in tons, calculated by adding the sum of (2)a.viii. and (2)b.vii. to the totals from the previous eleven months.
 - d. the rolling 12-month summation, of each type of coating employed in gallons, calculated by adding the amounts recorded in (2)a.ii. to the amounts recorded in the previous eleven months.
 - e. the rolling 12-month summation, of all the types of ink employed in gallons (and pounds), calculated by adding the amounts recorded in (2)b.ii. to the amounts recorded in the previous eleven months.
- (3) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 0.75 percent of the temperature being measured or ± 4.5 degrees Fahrenheit (± 2.5 degrees Celsius), whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance;
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit;
 - c. whenever the monitored value for the combustion temperature deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations; and
 - d. in response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable combustion temperature specified

above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time of the deviation, the total period of time during which there was a deviation, the combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (5) Notwithstanding the frequency of reporting requirements specified in d)(4), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no visible emissions; and

- b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(4).

The permittee shall revert to daily observations if any visible emissions are observed.

- (6) The permittee shall collect and record the following information for each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
 - a. The name and identification number/code of each coating, thinner, additive, and any material containing any HAP;
 - b. The weight fraction of each individual HAP contained in each material applied (and identified in "a." above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;
 - c. The number of gallons of each coating, thinner, additive, and other material applied during the month;
 - d. The density of each coating, thinner, additive, and other material employed, in pound(s) per gallon;
 - e. For each coating operation not subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." for each HAP in coating;
 - f. For each coating operation subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." times "1 minus the overall control efficiency of the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance" for each HAP in coating;
 - g. For each individual HAP, the sum of the calculated emission rate for all the coating, thinners, additive, and other materials (not including cleanup materials) employed during the month, in ton(s), i.e., the summation of the individual HAP emission rates calculated in "e." and "f." above;
 - h. For combined HAPs, the calculated total combined HAPs emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, i.e., the summation of the total emission of each of the individual HAP emission rates, calculated in "g." above;
 - i. For each individual HAP, the calculated total emissions during the rolling 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "g." above, for the present month plus the previous 11 months of operation, in ton(s); and
 - j. The calculated total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "h." above, for the present month plus the previous 11 months of operation, in ton(s).

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Toledo Division of Environmental Services contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings.

Note: The inside spray, over varnish, and the bottom varnish coating emissions and ink emissions are currently controlled by the thermal oxidizer.

- (7) See 40 CFR 60 Part 60, Subpart WW (60.490 – 60.496).
- (8) The permittee shall maintain daily records that document any time periods when the oil mist collection system was not in service when the body making equipment was in operation.
- (9) The permittee shall maintain documentation (operating manual(s)) for the particulate filter system, along with documentation of any modifications deemed necessary by the permittee. This documentation shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services up on request.
- (10) The permittee shall conduct periodic inspections of the particulate filter system to determine whether it is operating in accordance with operating manual(s) and sound engineering judgment. These inspections shall be performed at a frequency that shall be based upon sound engineering judgment and the permittee shall maintain a copy of the inspection frequency and it shall be made available to the Ohio EPA upon request.
- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the operation manual(s) and sound engineering judgment.
- (12) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and
 - d. The name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Toledo Division of Environmental Services upon request.

- (13) The permittee shall maintain records that document any time periods when the particulate filter system was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the particulate filter system was not operated according to the operating manual(s) with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emission unit, as fuel. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.
- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all exceedances of the rolling, 12-month usage rate limitations for coatings specified under c)(3);
 - b. all exceedances of the rolling, 12-month emission limitation for VOC;
 - c. all exceedances of the rolling, 12-month emission limitations for individual HAP or any combination of HAP; and
 - d. identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and describe any corrective actions taken to minimize or eliminate the visible particulate emissions. If no visible emissions observed, then state no visible emissions occurred during that period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

- (4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:
 - a. each period of time when the combustion temperature was outside the acceptable range;
 - b. an identification of each incident of deviation described in (4)a. where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (4)a. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (4)a. where proper records were not maintained for the investigation and/or the corrective action.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data

obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

- (5) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the oil mist collector was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 30 days after the event occurs.
 - (6) See 40 CFR part 60, Subpart WW (60.490 – 60.496).
 - (7) The permittee shall submit quarterly reports with any daily record showing that the particulate filter system was not in service or not operating according to the operating manual(s) and sound engineering judgment when the emissions unit(s) was/were in operation.
 - (8) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (9) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Emissions from all emissions units at the facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

Applicable Compliance Method:

The monitoring and record keeping requirements of B.2.a).will be used to demonstrate compliance.
 - b. Emission Limitation:

50.21 tons of VOC per rolling, 12-month period for this emissions unit

Applicable Compliance Method:

A one-time calculation of the yearly (12-month) federally enforceable usage limitation emissions, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

[Sum of {(Gallons of coating applied per year)(weight % of VOC)(density of coating)(1-CE)} + sum of {(fuel usage rating)(5.5 lb/mmscf)(8760 hrs/yr)(1-CE)}/(1020 mmBtu/mmscf) }]/ (2000 lb/ton)

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

[(74,435 gal over varnish/yr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)(1-0.684)+ (4120 gal bottom varnish/yr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)(1-0.684)+(186,095 gal inside spray/yr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(7188 gal ink/yr)(0.14 lb VOC/lb ink)(12.96 lb/gal)(1-0.684)+(5.5 lb/mmscf)(3.00 mmBTU/hr)(8760 hr/yr)(1-0.684)/(1020 mmBTU/mmscf)+(5.5 lb/mmscf)(3.55 mmBTU/hr)(8760 hr/yr)(1-0.684)/(1020 mmBTU/mmscf)]/(2000 lb/ton)

c. Emission Limitation:

14.04 pounds of VOC per hour.

Applicable Compliance Method:

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

Sum of [(Gallons of coating applied per hour)(weight % of VOC)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmscf)(8760 hrs/yr)(1-CE)}/(1020 mmBtu/mmscf)]

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

(10.31 gal over varnish/hr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)(1-0.684)+ (0.58 gal bottom varnish/hr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)(1-0.684)+(26.08 gal inside spray/hr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(1.01 gal ink/hr)(0.14 lb VOC/lb ink)(12.96 lb/gal)(1-0.684)+(5.5 lb/mmscf)(3.00 mmBTU/hr)(1-0.684)/(1020 mmBTU/mmscf)+(5.5 lb/mmscf)(3.55 mmBTU/hr)(1-0.684)/(1020 mmBTU/mmscf)

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

d. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

2.1 pounds of VOC per gallon of coating (excluding water and exempt solvents) for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Emission Limitation:

2.9 pounds of VOC per gallon of coating solids for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g. Emission limitation:

1.81 pounds of VOC per gallon of coating (excluding water and exempt solvents) for inks.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

h. Emission Limitation:

3.5 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the inside spray.

Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

i. Emission Limitation:

6.8 pounds of VOC per gallon of coating solids for the inside spray.

Applicable Compliance Method:

The monitoring and record keeping requirement in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the

methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be based upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

j. Emission Limitation:

PE shall not exceed 0.29 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 1.9 pounds of PE per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 3.00 mMBTU per hour printer pin oven and 3.55 mMBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by a worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-.090)=0.006)$.

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

k. Emission Limitation:

PE shall not exceed 1.32 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PE emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

I. Emission Limitation:

SO₂ emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 0.6 pound of SO₂ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

m. Emission Limitation:

SO₂ emissions shall not exceed 0.01 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly SO₂ emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

n. Emission Limitation:

NO_x emissions shall not exceed 0.64 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 100 pounds of NO_x per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

o. Emission Limitation:

NO_x emissions shall not exceed 2.79 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly NO_x emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

p. Emission Limitation:

CO emissions shall not exceed 0.54 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 84 pounds of CO per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

q. Emission Limitation:

CO emissions shall not exceed 2.38 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly CO emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

r. Emission Limitation:

PM₁₀ emissions shall not exceed 0.33 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 7.6 pound of PM₁₀ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 3.00 mmBTU per hour printer pin oven and 3.55 mmBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by a worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.090)=0.006)$.

s. Emission Limitation:

PM₁₀ emissions shall not exceed 1.21 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PM₁₀ emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

t. Emission Limitation:

95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the continuous motion printer and inside body spray.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A and Method 204 through 204F of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternate method or procedure for the determination of capture efficiency in accordance with the US EPA'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 alternate if such approval does not contravene any other applicable requirement.).

g) Miscellaneous Requirements

(1) none.



2. K011, Modified Can Manufacturing Line 4

Operations, Property and/or Equipment Description:

Modified beverage can production line #4 for 24 oz. size cans – consisting of can making equipment (cupper, body makers and trimmers), a continuous motion printer with a 2.75 mmBtu/hr oven and an interior body spray coater with 5.2 mmBtu/hr inside bake oven; the inside bake oven controlled with a 7.3 mmBtu/hr regenerative thermal oxidizer (RTO).

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 71.60 tons per rolling, 12-month period from line 4.</p> <p>See b)(2)a. and c)(2).</p>
b.	ORC 3704.03(T)	<p>VOC emissions shall not exceed 22.51 pounds per hour.</p> <p>See b)(2)d. and b)(2)f.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Sulfur dioxide (SO₂) emissions shall not exceed 0.01 pound per hour and 0.02 ton per year.</p> <p>Nitrogen Oxides (NO_x) emissions shall not exceed 0.78 pound per hour and 3.41 tons per year.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.66 pound per hour and 2.89 tons per year.</p> <p>Particulate matter of less than 10 microns in diameter (PM₁₀) shall not exceed 0.34 pound per hour and 1.15 ton per year.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Filterable particulate (PE) emissions shall not exceed 0.30 pound per hour and 0.94 ton per year. See b)(2)i.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)j.
e.	OAC rule 3745-17-07(A)(1)	Visible Emissions (VE) from stacks serving this emissions unit shall not exceed 20% opacity as a six minute average.
f.	OAC rule 3745-17-11(C)	See b)(2)c.
g.	OAC rule 3745-18-06(A)	See b)(2)g.
h.	40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496) [In accordance with 40 CFR 60.492, this emissions unit is a two-piece beverage can surface coating line with an over varnish and inside spray coating operation subject to the emission limitations specified in this section.]	See b)(2)b. and b)(2)e.
i.	OAC rule 3745-21-09(D)	See b)(2)b.
j.	40 CFR Part 60 Subpart A (40 CFR 60.490 – 60.496)	See b)(2)h.

(2) Additional Terms and Conditions

- a. The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.
- b. The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- c. Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(l) of this rule shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices (particulate control system) and follow the work practice standards as stated in (C)(2) of this rule.

- d. Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:
- | | |
|------------------------------|---|
| inks: | 1.81 pounds per gallon of coating excluding water and exempt solvents; |
| over varnish: | 1 pounds per gallon of coating excluding water and exempt solvents; |
| | 2.9 pounds per gallon of coating solids; |
| exterior bottom end varnish: | 2.1 pounds per gallon of coating excluding water and exempt solvents; |
| | 2.9 pounds per gallon of coating solids; |
| inside spray: | 5 pounds per gallon of coating excluding water and exempt solvents; and |
| | 6.8 pounds per gallon of coating solids. |
- e. This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- f. For the regenerative thermal oxidizer (RTO), the capture efficiency shall be a minimum of 72% and the destructive efficiency shall be a minimum of 95% for VOC emissions from the inside body spray oven.
- g. OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 BTU per standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- h. 40 CFR Part 60 Subpart A provides applicability, provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- i. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265

changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- j. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, NO_x, PE, PM₁₀, and CO emissions from this air contaminant source since the uncontrolled potential to emit for SO₂, NO_x, PE, PM₁₀ and CO is less than 10 tons per year.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.
- (2) Coating material usage shall not exceed the following levels based upon a rolling, 12-month summation of the usage rates:

Inside spray:	165,812 gallons;
Over varnish:	64,088 gallons;
Bottom varnish:	3,671 gallons; and
Inks:	6,404 gallons.
- (3) The permittee shall not operate the body making equipment when the oil mist collection system is not in operation.
- (4) See 40 CFR Part 60, Subpart WW (60.490 – 60.496).
- (5) The permittee shall operate the particulate filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the operating manual(s) and sound engineering judgment.
- (6) In the event the particulate filter system is not operating in accordance with the operating manual(s) or sound engineering judgment, the control device shall be expeditiously repaired or otherwise returned to documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

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

- (2) The permittee shall maintain daily records that document any time periods when the oil mist collection system was not in service when the body making equipment was in operation.
- (3) The permittee shall collect and record the following information each month for the line:
- a. For the coatings:
- i. the name and identification number of each coating (i.e., over varnish, bottom varnish or inside spray coating), as applied,
 - ii. the total volume of each coating for the month, in gallons;
 - iii. the VOC content of each coating, in pounds of VOC per gallon of coating,
 - iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents,
 - v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied,
 - vi. the uncontrolled VOC emissions from all coatings applied, (ii.) x (iii.) ÷ 2000, in tons;
 - vii. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
 - viii. the total VOC emissions, both controlled and uncontrolled, from all coatings applied, i.e., summation of "vi." for all uncontrolled coatings plus the summation of "vi." x "vii." for all coatings controlled by the thermal oxidizer.

Note: The inside spray coating VOC emissions are the only emissions currently controlled by the thermal oxidizer.

- b. For the inks:
- i. the name and identification number of each ink, as applied,
 - ii. the volume (and mass) of each ink, in gallons (and pounds),
 - iii. the VOC content of each ink, in pounds of VOC per gallon (and pound) of ink,
 - iv. the VOC content of each ink, in pounds of VOC per gallon of coating excluding water and exempt solvents,
 - v. the monthly total VOC emissions from all inks applied, i.e. (ii.) x (iii.), in tons;

Note: The ink emissions are not controlled by the thermal oxidizer.

- c. the rolling 12-month summation of VOC emissions from all coatings and inks employed, in tons, calculated by adding the sum of (3)a.viii. and (3)b.vii. to the totals from the previous eleven months.
 - d. the rolling 12-month summation, of each type of coating employed in gallons, calculated by adding the amounts recorded in (3)a.ii. to the amounts recorded in the previous eleven months.
 - e. the rolling 12-month summation, of all the types of ink employed in gallons, calculated by adding the amounts recorded in (3)b.ii. to the amounts recorded in the previous eleven months.
- (4) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 0.75 percent of the temperature being measured or ± 4.5 degrees Fahrenheit (± 2.5 degrees Celsius), whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test (1616° F based on the emissions test performed on 7/8/08 for EU # K010 and K011) that demonstrated the emissions unit to be in compliance;
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit;
 - c. whenever the monitored value for the combustion temperature deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations; and
 - d. in response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable combustion temperature specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time of the deviation, the total period of time during

which there was a deviation, the combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (5) The permittee shall collect and record the following information for each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
- a. The name and identification number/code of each coating, thinner, additive, and any other material containing any HAP;
 - b. The weight fraction of each individual HAP contained in each material applied (and identified in "a." above i.e., pound of each individual HAP per pound of each HAP-containing material applied);
 - c. The number of gallons of each coating, thinner, additive, and other material applied during the month;
 - d. The density of each coating, thinner, additive, and other material employed, in pound(s) per gallon;
 - e. For each coating operation not subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." for each HAP in coating;
 - f. For each coating operation subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." times "1 minus the overall control efficiency of the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance" for each HAP in each coating;
 - g. For each individual HAP, the sum of the calculated emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, in ton(s), i.e., the summation of the individual HAP emission rates calculated in "e." and "f." above;
 - h. For combined HAPs, the calculated total combined HAPs emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates, calculated in "g." above;
 - i. For each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "g." above, for the present month plus the previous 11 months of operation, in tons(s); and

- j. The calculated total combined HAP emissions during the rolling, 12-month period, i.e., the summation of all HAP emissions, as recorded in "h." above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings materials.

Note: The inside spray coating VOC emissions are the only emissions currently controlled by the thermal oxidizer.

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) Notwithstanding the frequency of reporting requirements specified in d)(6), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
- a. For one full quarter the facility's visual observations indicate no visible emissions; and
 - b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(6).

The permittee shall revert to daily observations if any visible emissions are observed.

- (8) See 40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496).
- (9) The permittee shall maintain documentation (operating manual(s)) for the particulate filter system, along with documentation of any modifications deemed necessary by the permittee. This documentation shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services upon request.
- (10) The permittee shall conduct periodic inspections of the particulate filter system to determine whether it is operating in accordance with the operating manual(s) and sound engineering judgment. These inspections shall be performed at a frequency that shall be based upon sound engineering judgment and the permittee shall maintain a copy of the inspection frequency and it shall be made available to the Ohio EPA upon request.
- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the operating manual(s) and sound engineering judgment.
- (12) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and
 - d. The name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Toledo Division of Environmental Services upon request.

- (13) The permittee shall maintain records that document any time periods when the particulate filter system was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the particulate filter system was not operated according to the operating manual(s) with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit as fuel. Each report shall be submitted within 30 days after the deviation occurs to the Toledo Division of Environmental Services.

- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the oil mist collector was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 30 days after the event occurs.
- (3) The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of non-complying coatings or inks. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 30 days following the end of the calendar month.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all exceedances of the rolling, 12-month usage rate limitations specified under c)(2);
 - b. all exceedances of the rolling, 12-month emission limitation for VOC;
 - c. all exceedances of the rolling, 12-month emission limitations for individual HAP or any combination of HAPs;
 - d. identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and describe any corrective actions taken to minimize or eliminate the visible particulate emissions. If no visible emissions observed, then state no visible emissions occurred during that period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

- (5) The permittee shall submit quarterly reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:
 - a. each period of time when the combustion temperature was outside the acceptable range;
 - b. an identification of each incident of deviation described in (5)a. where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (5)a. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (5)a. where proper records were not maintained for the investigation and/or the corrective action.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have

occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

- (6) See 40 CFR Part 60, Subpart WW (60.490 – 60.496).
- (7) The permittee shall submit quarterly reports with any daily record showing that the particulate filter system was not in service or not operated according to the operating manual(s) and sound engineering judgment when the emissions unit(s) was/were in operation.
- (8) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (9) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) **Testing Requirements**

- (1) Compliance with b)(1) and (b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Emissions from all emissions units at the facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

Applicable Compliance Method:

The monitoring and record keeping requirement of B.2.a).will be used to demonstrate compliance.

- b. **Emission Limitation:**

71.60 tons of VOC per rolling, 12-month period for line 4.Applicable Compliance Method:

A one-time calculation of the yearly (12-month) federally enforceable usage limitation emissions, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

$$[\text{Sum of } \{(\text{Gallons of coating applied per year})(\text{weight \% of VOC})(\text{density of coating})(1-\text{CE})\} + \text{sum of } \{(\text{fuel usage rating})(5.5 \text{ lb/mmscf})(8760 \text{ hrs/yr})(1-\text{CE})\} / (1020 \text{ mmBtu/mmscf})] / (2000 \text{ lb/ton})$$

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

$[(64,088 \text{ gal over varnish/yr})(0.112 \text{ lb VOC/lbovervarnish})(8.75 \text{ lb/gal})+(3671 \text{ gal bottom varnish/yr})(0.149 \text{ lb VOC/lb bottom varnish})(9.0 \text{ lb/gal})+(165,812 \text{ gal inside spray/yr})(0.144 \text{ lb VOC/lb inside spray})(8.43 \text{ lb/gal})(1-0.684)]+(6404 \text{ gal ink/yr})(0.14 \text{ lb VOC/lb ink})(12.96 \text{ lb/gal})+(5.5 \text{ lb/mmscf})(2.75 \text{ mmBTU/hr})(8760 \text{ hr/yr})/(1020 \text{ mmBTU/mmscf})+(5.5 \text{ lb/mmscf})(5.20 \text{ mmBTU/hr})(8760 \text{ hr/yr})(1-0.684)/(1020 \text{ mmBTU/mmscf})/(2000 \text{ lb/ton})$

c. Emission Limitation:

22.51 pounds per hour of VOC.

Applicable Compliance Method:

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings with the inside spray operation controlled by the RTO:

Sum of [(Gallons of coating applied per hour)(weight % of VOC)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmscf)(8760 hrs/yr)(1-CE)]/1020 mmBtu/mmscf] CE=0 for all coatings, inks, and other materials except inside spray and inside spray oven.

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

$(10.08 \text{ gal over varnish/hr})(0.112 \text{ lb VOC/lbovervarnish})(8.75 \text{ lb/gal})+(0.58 \text{ gal bottom varnish/hr})(0.149 \text{ lb VOC/lb bottom varnish})(9.0 \text{ lb/gal})+(26.08 \text{ gal inside spray/hr})(0.144 \text{ lb VOC/lb inside spray})(8.43 \text{ lb/gal})(1-0.684)+(1.01 \text{ gal ink/hr})(0.14 \text{ lb VOC/lb ink})(12.96 \text{ lb/gal})+(5.5 \text{ lb/mmscf})(2.75 \text{ mmBTU/hr})/(1020 \text{ mmBTU/mmscf})+(5.5 \text{ lb/mmscf})(5.20 \text{ mmBTU/hr})(1-0.684)/(1020 \text{ mmBTU/mmscf})$

d. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

PE shall not exceed 0.30 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 1.9 pounds of PE per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by a worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-.090)=0.006)$.

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

f. Emission Limitation:

PE shall not exceed 0.94 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PE emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

SO₂ emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 0.6 pound of SO₂ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

h. Emission Limitation:

SO₂ emissions shall not exceed 0.02 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly SO₂ emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

NO_x emissions shall not exceed 0.78 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 100 pounds of NO_x per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

j. Emission Limitation:

NO_x emissions shall not exceed 3.41 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly NO_x emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

k. Emission Limitation:

CO emissions shall not exceed 0.66 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 84 pounds of CO per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

l. Emission Limitation:

CO emissions shall not exceed 2.89 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly CO emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

m. Emission Limitation:

PM₁₀ emissions shall not exceed 0.34 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 7.6 pound of PM₁₀ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven and 5.20 mmBTU per hour inside bake oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by a worst case emissions calculation as follows: multiplying the maximum coating usage (26.08 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.090)=0.006)$.

n. Emission Limitation:

PM₁₀ emissions shall not exceed 1.15 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PM₁₀ emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

o. Emission limitation:

inks: 1.81 pounds of VOC per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and

3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

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

p. Emission limitation:

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

Applicable Compliance Method:

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

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

q. Emission limitation:

over varnish: 2.9 pounds of VOC per gallon of coating solids

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

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

until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

r. Emission limitation:

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

Applicable Compliance Method:

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

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

s. Emission limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

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

t. Emission limitation:

inside spray: 3.5 pounds of VOC per gallon of coating excluding water and exempt solvents

Applicable Compliance Method:

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

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

u. Emission limitation:

inside spray: 6.8 pounds of VOC per gallon of coating solids

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3). If required, compliance shall be demonstrated by an evaluation performed in accordance with 3745-21-10(B) and 40 CFR 60.496 using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

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

95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the inside body spray.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A and Method 204 through 204F of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternate method or procedure for the determination of capture efficiency in accordance with the US EPA'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 alternate is such approval does not contravene any other applicable requirement.).

- g) Miscellaneous Requirements
 - (1) None.



3. K012, Can Manufacturing Line 2

Operations, Property and/or Equipment Description:

Modified beverage can production line #2 for 8 oz. and 12 oz. size sleek and regular cans – consisting of can making equipment (cupper, body makers and trimmers), a continuous motion basecoater with a 3.00 mmBtu/hr basecoater oven; continuous motion printer with 2.75 mmBtu/hr continuous motion printer oven and an interior body sprayer with a 5.70 mmBtu/hr inside bake oven; all controlled with a regenerative thermal oxidizer (RTO)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 41.32 tons per rolling, 12-month period.</p> <p>See b)(2)b. and c)(2)</p>
b.	ORC 3704.03(T)	<p>VOC emissions shall not exceed 12.38 pounds per hour.</p> <p>See b)(2)a. and b)(2)c.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Sulfur dioxide (SO₂) emissions shall not exceed 0.03 pound per hour and 0.12 ton per year.</p> <p>Nitrogen Oxides (NO_x) emissions shall not exceed 1.12 pounds per hour and 4.92 tons per year.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.95 pound per hour and 4.13 tons per year.</p> <p>Particulate matter of less than 10 microns in diameter (PM₁₀) shall not exceed 0.28</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pound per hour and 1.03 tons per year. Filterable particulate (PE) emissions shall not exceed 0.23 pound per hour and 0.78 ton per year. See b)(2)h.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)i.
e.	OAC rule 3745-17-07(A)(1)	Visible emissions from stacks this emissions unit shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
f.	OAC rule 3745-17-11(C)	See b)(2)j.
g.	OAC rule 3745-18-06(A)	See b)(2)d.
h.	40 CFR Part 60, Subpart WW (40 CFR 60.490 – 60.496) [In accordance with 40 CFR 60.492, this emissions unit is a two-piece beverage can surface coating line with an over varnish and inside spray coating operation subject to the emission limitations specified in this section.]	See b)(2)e. and b)(2)f.
i.	OAC rule 3745-21-09(D)(1)	See b)(2)e.
j.	40 CFR Part 60 Subpart A (40 CFR 60.1 – 60.19)	See b)(2)g.

(2) Additional Terms and Conditions

- a. For the regenerative thermal oxidizer (RTO), the capture efficiency shall be a minimum of 72% and the destructive efficiency shall be a minimum of 95% for VOC emissions from the coatings and inks.
- b. The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.
- c. Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:

inks:	31 pounds per gallon of coating excluding water and exempt solvents;
basecoat:	3 pounds per gallon of coating excluding water and exempt solvents; 2.4 pounds per gallon of coating solids;
over varnish:	1 pounds per gallon of coating excluding water and exempt solvents; 2.9 pounds per gallon of coating solids;
exterior bottom end varnish:	1 pounds per gallon of coating excluding water and exempt solvents; 2.9 pounds per gallon of coating solids;
inside spray:	5 pounds per gallon of coating excluding water and exempt solvents; 6.8 pounds per gallon of coating solids; and

- d. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- e. The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- f. This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- g. 40 CFR Part 60 Subpart A provides applicability, provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05

was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- i. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, NO_x, PE, PM₁₀, and CO emissions from this air contaminant source since the uncontrolled potential to emit for SO₂, NO_x, PE, PM₁₀ and CO is less than 10 tons per year.

- j. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of this rule shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices (particulate filter system) and follow the work practice standards as stated in (C)(2) of this rule.

c) **Operational Restrictions**

- (1) The permittee shall burn only natural gas as fuel in these emissions units.
- (2) Coating and ink usage in this emissions unit shall not exceed the following levels based upon a rolling, 12-month summation of the usage rates:

Base coat:	35,597 gallons;
Over varnish:	64,335 gallons;
Bottom varnish:	2,885 gallons;
Inside spray:	124,021 gallons; and
Inks:	4,363 gallons.
- (3) The permittee shall not operate the body making equipment when the oil mist collection system is not in operation.
- (4) See 40 CFR part 60, Subpart WW (60.490 – 60.496).
- (5) The permittee shall operate the particulate filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the operating manual(s) and sound engineering judgment.

- (6) In the event the particulate filter system is not operating in accordance with the operating manual(s) or sound engineering judgment, the control device shall be expeditiously repaired or otherwise returned to documented operating conditions.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) For each day during which the permittee burns a fuel other than natural gas as fuel in these emissions units.
- (2) The permittee shall collect and record the following information each month for the line:
- a. For the coatings:
- i. the name and identification number of each coating (i.e., over varnish, bottom varnish, inside spray coating, or basecoat coating), as applied;
 - ii. the volume of each coating employed, in gallons;
 - iii. the VOC content of each coating, in pounds of VOC per gallon of coating;
 - iv. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents;
 - v. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied;
 - vi. the uncontrolled VOC emissions from all coatings applied, i.e., "ii." x "iii.";
 - vii. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
 - viii. the total VOC emissions, both controlled and uncontrolled, from all coatings applied, i.e., the summation of "vi." for all uncontrolled coatings plus the summation of "vi." x "vii." for all coatings controlled by the thermal oxidizer.
- Note: The inside spray, overvarnish, and the bottom varnish coating emissions are currently controlled by the thermal oxidizer.
- b. For the inks:
- i. the name and identification number of each ink, as applied;
 - ii. the volume (and mass) of each ink employed, in gallons (and pounds);
 - iii. the VOC content of each ink, in pounds of VOC per gallon (and pounds) of ink;
 - iv. the VOC content of each ink, in pounds of VOC per gallon of ink excluding water and exempt solvents; and

- v. the uncontrolled VOC emissions from all inks applied, i.e., “ii.” x “iii.”;
- vi. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance; and
- vii. the total VOC emissions from all inks applied, i.e. the summation of “v.” for all uncontrolled inks plus the summation of “v.” x “vi.” for all inks controlled by the thermal oxidizer.

Note: The ink emissions are currently controlled by the thermal oxidizer.

- c. the rolling 12-month summation of VOC emissions from all coatings and inks employed, in tons, calculated by adding the sum of (2)a.viii. and (2)b.vii. to the totals from the previous eleven months.
 - d. the rolling 12-month summation, of each type of coating employed in gallons, calculated by adding the amounts recorded in (2)a.ii. to the amounts recorded in the previous eleven months.
 - e. the rolling 12-month summation, of all the types of ink employed in gallons (and pounds) , calculated by adding the amounts recorded in (2)b.ii. to the amounts recorded in the previous eleven months.
- (3) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 0.75 percent of the temperature being measured or ± 4.5 degrees Fahrenheit (± 2.5 degrees Celcius), whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance;
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit;
 - c. whenever the monitored value for the combustion temperature deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date(s) the investigation was conducted, the names of the

personnel who conducted the investigation, and the findings and recommendations; and

- d. in response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable combustion temperature specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time of the deviation, the total period of time during which there was a deviation, the combustion temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (5) Notwithstanding the frequency of reporting requirements specified in d)(4), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

- a. For one full quarter the facility's visual observations indicate no visible emissions; and
- b. The permittee continues to comply with all the record keeping and monitoring requirements specified in d)(4).

The permittee shall revert to daily observations if any visible emissions are observed.

- (6) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
 - a. The name and identification number/code of each coating, thinner, additive, and other material containing any HAP;
 - b. The weight fraction of each individual HAP contained in each material applied (and identified in "a." above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;
 - c. The number of gallons of each coating, thinner, additive, and other material applied during the month;
 - d. The density of each coating, thinner, additive, and other material employed, in pound(s) per gallon;
 - e. For each coating operation not subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." for each HAP in coating;
 - f. For each coating operation subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." times "1 minus the overall control efficiency of the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance" for each HAP in coating;
 - g. For each individual HAP, the sum of the calculated emission rate for all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, in ton(s), i.e., the summation of the individual HAP emission rates calculated in "e." and "f." above;
 - h. For combined HAPs, the calculated total combined HAPs emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, i.e. the summation of the total emissions of each of the individual HAP emissions rates, calculated in "g." above;
 - i. For each individual HAP, the calculated total combined HAPs emission rate from all the coatings, thinners, additives, and other materials (not including cleanup materials) employed during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates, calculated in "g." above; and

- j. The calculated total combined HAP emissions during the rolling, 12-month period, i.e. the summation of all HAP emission, as recorded in "g." above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Toledo Division of Environmental Services contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

Note: The inside spray, over varnish, and the bottom varnish coating emissions and the ink emissions are currently controlled by the thermal oxidizer.

- (7) See 40 CFR Part 60, Subpart WW (60.490 - 60.496)
- (8) The permittee shall maintain daily records that document any time periods when the oil mist collection system was not in service when the body making equipment was in operation.
- (9) The permittee shall maintain documentation (operating manual(s)) for the particulate filter system, along with documentation of any modifications deemed necessary by the permittee. This documentation shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services upon request.
- (10) The permittee shall conduct periodic inspections of the particulate filter system to determine whether it is operating in accordance with the operating manual(s) and sound engineering judgment. These inspections shall be performed at a frequency that shall be based upon sound engineering judgment and the permittee shall maintain a copy of the inspection frequency and it shall be made available to the Ohio EPA upon request.
- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the operation manual(s) and sound engineering judgment.
- (12) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
- a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repair performed; and
 - d. The name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date of the inspection and any necessary maintenance or repairs were completed and shall be made available to the Toledo Division of Environmental Services upon request.

- (13) The permittee shall maintain records that document any time periods when the particulate filter system was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the particulate filter system was not operated according to the operating manual(s) with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.
- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- all exceedances of the rolling, 12-month usage rate limitations for coatings specified under c)(2);
 - all exceedances of the rolling, 12-month emission limitation for VOC;
 - all exceedances of the rolling, 12-month emission limitations for individual HAP or any combination of HAPs;
 - all days during which any visible particulate emissions were observed from any stack serving this emissions unit; and
 - describe any corrective actions taken to minimize or eliminate the visible particulate emissions. If no visible emissions observed, then submit a report which states no visible emissions occurred during that period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

- (4) The permittee shall submit quarterly reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:
- each period of time when the combustion temperature was outside the acceptable range;
 - an identification of each incident of deviation described in (4)a. where a prompt investigation was not conducted;

- c. an identification of each incident of deviation described in (4)a. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. and identification of each incident of deviation described in (4)a. where proper records were not maintained for the investigation and/or the corrective action.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

- (5) See 40 CFR Part 60, Subpart WW (60.490 – 60.496).
 - (6) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the oil mist collector was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 30 days after the event occurs.
 - (7) The permittee shall submit quarterly reports with any daily record showing that the particulate filter system was not in service or not operated according to the operating manual(s) and sound engineering judgment when the emissions unit(s) was/were in operation.
 - (8) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (9) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Emissions from all emissions units at the facility shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.

Applicable Compliance Method:

The monitoring and record keeping requirements of B.2.a).will be used to demonstrate compliance.
 - b. Emission Limitation:

41.32 tons of VOC per rolling, 12-month period for Line 2.

Applicable Compliance Method:

A one-time calculation of the yearly (12-month) federally enforceable usage limitation emissions, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

[Sum of {(Gallons of coating applied per year)(weight % of VOC)(density of coating)(1-CE)} + sum of {(fuel usage rating)(5.5 lb/mmscf)(8760 hrs/yr)(1-CE)}/(1020 mmBtu/mmscf)}/ (2000 lb/ton)

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

[(35,597 gal base coat/yr)(0.088 lb VOC/lb base coat)(11.0 lb/gal)(1-0.684)+(64,335 gal over varnish/yr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)(1-0.684)+(2885 gal bottom varnish/yr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)(1-0.684)+(124,021 gal inside spray/yr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(4363 gal ink/yr)(0.14 lb VOC/lb ink)(12.96 lb/gal)(1-0.684)+(5.5 lb/mmscf)(3.00 mmBTU/hr)(8760 hr/yr)(1-0.684)}/(1020 mmBTU/mmscf)+(5.5 lb/mmscf)(2.75 mmBTU/hr)(8760 hr/yr)(1-0.684)}/(1020 mmBTU/mmscf)]/(2000 lb/ton)+ (5.5 lb/mmscf)(5.70 mmBTU/hr)(8760 hr/yr)(1-0.684)}/(1020 mmBTU/mmscf)]/(2000 lb/ton)

c. Emission Limitation:

12.38 pounds of VOC per hour.

Applicable Compliance Method:

A one-time calculation of the hourly potential to emit, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

This emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings:

Sum of [(Gallons of coating applied per hour)(weight % of VOC)(density of coating)(1-CE)] + sum of [(fuel usage rating)(5.5 lb/mmscf)(8760 hrs/yr)(1-CE)}/(1020 mmBtu/mmscf)]

CE = overall percentage capture & control efficiency of the RTO, as determined during the most recent emissions test that demonstrated compliance.

(5.75 gal base coat/hr)(0.088 lb VOC/lb base coat)(11.0 lb/gal)(1-0.684)+ (9.43 gal over varnish/hr)(0.112 lb VOC/lbovervarnish)(8.75 lb/gal)(1-0.684)+ (0.43 gal bottom varnish/hr)(0.149 lb VOC/lb bottom varnish)(9.0 lb/gal)(1-0.684)+(18.39 gal inside spray/hr)(0.144 lb VOC/lb inside spray)(8.43 lb/gal)(1-0.684)+(0.71 gal

$$\text{ink/hr}(0.14 \text{ lb VOC/lb ink})(12.96 \text{ lb/gal})(1-0.684)+(5.5 \text{ lb/mmscf})(3.00 \text{ mmBTU/hr})(1-0.684)/(1020 \text{ mmBTU/mmscf})+(5.5 \text{ lb/mmscf})(2.75 \text{ mmBTU/hr})(1-0.684)/(1020 \text{ mmBTU/mmscf})+(5.5 \text{ lb/mmscf})(5.70 \text{ mmBTU/hr})(1-0.684)/(1020 \text{ mmBTU/mmscf})$$

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

d. Emission limitation:

1.8 pounds of VOC per gallon of coating (minus water and exempt solvents) for the continuous motion base coat coating line.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission limitation:

2.40 pound of VOC per gallon of coating solids for the continuous motion base coat coating line.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation:

2.1 pounds of VOC per gallon of coating (excluding water and exempt solvents) for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

h. Emission Limitation:

2.9 pounds of VOC per gallon of coating solids for over varnish and exterior bottom end varnish.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

i. Emission limitation:

1.81 pounds of VOC per gallon of coating (excluding water and exempt solvents) for inks.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the US EPA and shall use formulation data for that coating to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

j. Emission Limitation:

3.5 pounds of VOC per gallon of coating (excluding water and exempt solvents) for the interior body coating line, line 2 can body sprayers.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

k. Emission Limitation:

6.8 pounds of VOC per gallon of coating solids for the Interior Body Coating, line 2 can body sprayers.

Applicable Compliance Method:

The monitoring and record keeping requirements in d)(2) will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in US EPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be based upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating, the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the US EPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the US EPA provides alternative analytical procedures or alternative precision statements for Method 24.

I. Emission Limitation:

PE shall not exceed 0.23 pound per hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 1.9 pounds of PE per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven and 3.0 mmBTU per hour coating oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by a worst case emissions calculation as follows: multiplying the maximum coating usage (18.39 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.090)=0.006)$.

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

m. Emission Limitation:

PE shall not exceed 0.78 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PE emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

n. Emission Limitation:

SO₂ emissions shall not exceed 0.03 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 0.6 pound of SO₂ per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven and 3.0 mmBTU per hour coating oven.

o. Emission Limitation:

SO₂ emissions shall not exceed 0.12 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly SO₂ emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

p. Emission Limitation:

NO_x emissions shall not exceed 1.12 pounds per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 100 pounds of NO_x per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven and 3.0 mmBTU per hour coating oven.

q. Emission Limitation:

NO_x emissions shall not exceed 4.92 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly NO_x emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

r. Emission Limitation:

CO emissions shall not exceed 0.95 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 84 pounds of CO per million standard cubic feet by 1 million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per hour printer pin oven, 5.70 mmBTU per hour inside bake oven and 3.0 mmBTU per hour coating oven.

s. Emission Limitation:

CO emissions shall not exceed 4.13 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly CO emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

t. Emission Limitation:

PM₁₀ emissions shall not exceed 0.28 pound per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation through a calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: multiply the emission factor of 7.6 pound of PM₁₀ per million standard cubic feet by 1million BTU per 1020 million cubic feet and multiply by the maximum fuel use rate of the combined 2.75 mmBTU per

hour printer pin oven, 5.70 mmBTU per hour inside bake oven and 3.0 mmBTU per hour coating oven.

To this amount will be added the inside spray particulate emissions, whose compliance shall be demonstrated by a worst case emissions calculation as follows: multiplying the maximum coating usage (18.39 gal/hr) by the coating density (8.43 lb coating/gal coating), the solid concentration (0.211 lb PE/lb coating) and one minus the transfer efficiency multiplied by one minus the control efficiency $((1-0.94)(1-0.090)=0.006)$.

u. Emission Limitation:

PM₁₀ emissions shall not exceed 1.03 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly PM₁₀ emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

v. Emission Limitation:

95% destructive efficiency and a minimum 72% capture efficiency for VOC emissions from the inside body spray.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 or 25A of 40 CFR Part 60 Appendix A and Method 204 through 204F of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternate method or procedure for the determination of capture efficiency in accordance with the US EPA'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 alternate if such approval does not contravene any other applicable requirement.).

g) Miscellaneous Requirements

(1) None.

4. K015, Clean-up Operation

Operations, Property and/or Equipment Description:

Clean-up operation facility wide

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile Organic Compound (VOC) emissions shall not exceed 6.55 pounds of VOC per gallon of solvent. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)(b).
c.	OAC rule 3745-31-05(D)	Volatile Organic Compound (VOC) emissions shall not exceed 6.55 tons per rolling, 12-month period. See c)(1) and c)(2).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install P0105399 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Clean-up material usage shall not exceed 2,000 gallons per rolling, 12-month period;
- ii. VOC emissions shall not exceed 6.55 pounds of VOC per gallon, and
- iii. Clean-up solvent shall not contain HAP.

c) **Operational Restrictions**

- (1) Clean-up material usage shall not exceed 2,000 gallons per rolling, 12-month period.
- (2) Clean-up solvent shall not contain HAP.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for the clean-up solvent:
 - a. The name and identification number of each clean-up material employed;
 - b. The volume of each clean-up material employed, in gallons;
 - c. The VOC content of each clean-up material employed, in pounds of VOC per gallon;
 - d. an identification of whether or not each cleanup material employed contains HAP;
 - e. The monthly total VOC emissions from all clean-up materials employed, [(b.) x (c.)] /2000, in tons;
 - f. The rolling, 12-month summation of VOC emissions from all clean-up materials employed calculated by adding the monthly total emissions calculated in d)(1)e. with the monthly totals of the previous eleven months;
 - g. The rolling, 12-month summation of clean-up materials employed, in gallons, calculated by adding the monthly total volume of clean-up materials used as recorded in d)(1)b. with the amount used the previous eleven months;

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. All exceedances of the VOC emissions limit of 6.55 pounds of VOC per gallon.
- b. All exceedances of the rolling, 12-month usage rate limitation for cleanup materials specified under c)(1);
- c. All exceedances of the rolling, 12-month emission limitation for VOC; and
- d. any day in which a HAP-containing cleanup material was employed and the individual HAP emissions for each such day.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter.

- (2) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) **Testing Requirements**

- (1) Compliance with b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Clean-up solvent: 6.55 pounds of VOC per gallon

Applicable Compliance Method:

The permittee shall determine the VOC content of the clean-up solvent from manufacturer's formulation data. The monitoring and record keeping requirement in d)(1) will be used to demonstrate compliance.

- b. Emission Limitation:

6.55 tons of VOC per rolling, 12-month period for this emissions unit

Applicable Compliance Method:

A one-time calculation of the federally enforceable usage limitation emissions, based upon the worst case operating scenario, shall be used to demonstrate compliance with this limitation.

$$\frac{(\text{material usage in gallons per year})(\text{VOC content of solvent in pounds per gallon})}{(2000 \text{ lb/ton})}$$

(2000 gal/yr)(6.55 lb VOC/gal)/(2000 lb/ton)

The monitoring and record keeping requirements of d)(1) will be used to demonstrate compliance with this limitation.

g) Miscellaneous Requirements

(1) None.