

Facility ID: 0372030005 Issuance type: Title V Preliminary Proposed Permit

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

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

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

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#### **Part II - Specific Facility Terms and Conditions**

##### **a State and Federally Enforceable Section**

1. None

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##### **b State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility:

B001 - 3.2 mmBtu/hr, natural gas-fired washer boiler 1  
B002 - 3.2 mmBtu/hr, natural gas-fired washer boiler 2  
B003 - 8.4 mmBtu/hr, natural gas-fired plant heater boiler 1  
B004 - 8.4 mmBtu/hr, natural gas-fired plant heater boiler 2

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

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

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Facility ID: 0372030005 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage can line (line #1)	OAC rule 3745-21-09 (D)  40 CFR, Part 60, Subpart WW OAC rule 3745-17-07 OAC rule 3745-17-11	See A.I.2.a.  See A.I.2.b. See A.I.2.c. 0.551 pound particulate emissions (PE) per hour

**2. Additional Terms and Conditions**

- a. Volatile organic compound (VOC) emissions from the individual coatings shall not exceed the following:
  - (a)
    - i. interior body coating (inside spray coating): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents);
    - ii. overvarnish: 2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents); and
    - iii. exterior bottom end coating (bottom varnish): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents).
  - b. VOC emissions from the individual coatings shall not exceed the following:
    - i. inside spray coating - 0.89 kilogram of VOC per liter of coating solids (7.43 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average; and
    - ii. overvarnish - 0.46 kilogram of VOC per liter of coating solids (3.84 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average.
  - c. 20% opacity, as a six-minute average, except as provided by rule

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**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

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

pounds of VOC per gallon of solids, as applied;

c. the solids content of each coating, in gallons of solids per gallon of coating; and

d. the volume-weighted average of the total mass of VOC per volume of coating solids for all inside spray coatings employed and for all overvarnish coatings employed [this is calculated by summing the [VOC content (lbs/gallon) x number of gallons of each coating] for all coatings, and then dividing by the summation of the (solids content (gallons/gallon) x number of gallons of each coating) for all coatings] . (These calculations are not required if all inside spray coatings employed and all overvarnish coatings employed have VOC contents equal to or less than the limits specified in 40 CFR, Part 60, Subpart WW, section 60.492(c) and no VOC is added to the coatings during the application or distribution process.)

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system 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 within 30 days after the event occurs.

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:
    - 0.89 kilogram VOC per liter coating solids - inside spray coating
    - 0.46 kilogram VOC per liter coating solids - overvarnish
    - 4.2 pounds VOC/gallon of coating - inside spray coating
    - 2.8 pounds VOC/gallon of coating - overvarnish
    - 4.2 pounds VOC/gallon of coating - bottom varnish

Applicable Compliance Method:

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

Any determination of VOC content\*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

\* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

- b. Emission Limitation:
  - 0.551 lb/hr PE

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:  
20% opacity, as a six-minute average

Applicable Compliance Method:  
If required, compliance with the visible emissions limitations shall be determined in accordance with the test methods specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0372030005 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

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

- 1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage can line (line #1)	OAC rule 3745-31-05 PTI 03-9995	See B.I.2.a, b, & c.

2. **Additional Terms and Conditions**

- a. VOC emissions from the individual coatings shall not exceed the following:
  - 1.
    - i. coatings:
      - (a) interior body coating (inside spray): 38.73 pounds VOC per hour
      - (b) overvarnish: 10.90 pounds VOC per hour
      - (c) exterior bottom end coating (bottom varnish): 0.73 pound VOC per hour
    - ii. inks:
      - (a) 0.20 pound of VOC per pound of ink (monthly-weighted average),
      - (b) 2.94 pounds of VOC per hour
    - iii. blanket wash:
      - (a) 6.55 pounds of VOC per gallon
      - (b) 0.4 ton VOC per month
      - (c) 121 gallons of cleanup materials per month
  - b. Particulate emissions (PE) from the line shall not exceed the following:
    - i. 0.313 pound PE per hour, from overspray,
    - ii. 0.025 pound PE per hour from oil mist,
    - iii. 0.0121 pound PE per hour, from pin oven,
    - iv. 0.0346 pound PE per hour, from the IBO, and

- v. 5% opacity, as a six-minute average, from spray operations.
- c. The 38.73 lbs/hr (inside spray coating), 10.9 lbs/hr (overvarnish), 0.73 lbs/hr (bottom varnish), and 2.94 lbs/hr (inks) VOC limitations and the 121 gallons of cleanup materials per month are based on the emissions unit's potentials to emit. Therefore, no record keeping/monitoring and reporting are required to ensure compliance with these limitations.

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**II. Operational Restrictions**

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

1. The permittee shall maintain monthly records of the cleanup materials usage in this emissions unit, in gallons.
2. The permittee shall each month record and maintain the following information for this emissions unit :
  - a. For the inks:
    - i. the name and identification number of each ink employed;
    - ii. the pounds of VOC per pound of each ink, as applied, excluding water and exempt solvents; and
      - iii the monthly-weighted average of pounds of VOC per pound of ink, as applied, excluding water and exempt solvents.
    - b. For the blanket wash:
      - i. the name and identification number of each cleanup material employed;
      - ii. the mass of VOC per volume of each cleanup material employed (pounds/gallon);
      - iii. the number of gallons of each cleanup material employed; and
      - iv. the total VOC emissions from all cleanup materials employed, in tons.
  3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
 

Pollutant: Isopropyl alcohol  
 TLV microgram/cubic meter (ug/m<sup>3</sup>): 983,000  
 Maximum Hourly Emission Rate (lbs/hr): 1.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 43.20  
 MAGLC (ug/m<sup>3</sup>): 23,404.8
  4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
    - a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
    - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
    - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
  5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly allowable VOC emission limitation of 0.4 ton (from blanket wash). All quarterly deviation reports shall be submitted in accordance with paragraph A.3.b of the terms and conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup materials and inks in this emissions unit (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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#### V. Testing Requirements

1. Compliance with the emission limitations in section B.I of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:
    - 0.20 pound VOC per pound ink (monthly-weighted average)
    - 6.55 pounds VOC per gallon - blanket wash

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section B.III.1 of this permit.

Any determination of VOC content\*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

\* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - b. Emission Limitation:
    - 38.73 pounds VOC per hour - interior body coating (inside spray coating)

Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).
  - c. Emission Limitation:
    - 5% opacity, as a 6-minute average

Applicable Compliance Method:  
Compliance with the visible emissions limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
  - d. Emission Limitation:
    - 0.313 lb PE/hr, from overspray

Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with the test methods specified in OAC rule 3745-17-03-(B)(10).

- e. Emission Limitation:  
0.025 lb PE/hr, from oil mist
- Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:
- $E = \text{PE rate (lbs/hr)}$
- $E = \text{number gallons of oil per hour} \times 0.028 \text{ pound PE per gallon}^*$
- \* This is based on material balance.
- If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.
- f. Emission Limitations:  
0.0121 lb PE/hr, from pin oven  
0.0346 lb PE/hr, from IBO
- Applicable Compliance Method:  
The hourly allowable PE limitations were established utilizing the following equations:
- Pin Oven = maximum hourly gas usage rate (mm cu. ft/hr) X 1.9 lbs PE /mm cu.ft (AP-42, Table 1.4-2)
- IBO = maximum hourly gas usage rate (mm cu. ft/hr) X 1.9 lbs PE/mm cu.ft (AP-42, Table 1.4-2)
- If required, the permittee shall demonstrate compliance with the hourly allowable PE limitations pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.
- g. Emission Limitation:  
10.90 pounds VOC per hour - overvarnish coating
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).
- h. Emission Limitation:  
0.73 pound VOC per hour - exterior bottom end coating (bottom varnish coating)
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).
- i. Emission Limitation:  
2.94 pounds VOC per hour - inks
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum inks usage rate (gallons/hr) by the maximum VOC content of all the inks (lbs/gallon).
- j. Emission Limitation:  
121 gallons of cleanup materials per month
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the cleanup materials usage restriction based on the record keeping requirements specified in Section B.III.2 of this permit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030005 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage can line (line #2)	OAC rule 3745-21-09 (D)	See A.I.2.a.
	40 CFR, Part 60, Subpart WW	See A.I.2.b.
	OAC rule 3745-17-07	See A.I.2.c.
	OAC rule 3745-17-11	0.551 pound particulate emissions (PE) per hour

**2. Additional Terms and Conditions**

- a. Volatile organic compound (VOC) emissions from the individual coatings shall not exceed the following:
  - (a)
    - i. interior body coating (inside spray coating): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents);
    - ii. overvarnish: 2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents); and
    - iii. exterior bottom end coating (bottom varnish): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents).
  - b. VOC emissions from the individual coatings shall not exceed the following:
    - i. inside spray coating - 0.89 kilogram of VOC per liter of coating solids (7.43 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average; and
    - ii. overvarnish - 0.46 kilogram of VOC per liter of coating solids (3.84 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average.
- c. 20% opacity, as a six-minute average, except as provided by rule

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**II. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating, as applied;
  - b. the volume of each coating, in gallons, and the VOC content of each coating, in pounds of VOC per gallon of coating, in pounds of VOC per gallon of coating excluding water and exempt solvents, and in pounds of VOC per gallon of solids, as applied;
  - c. the solids content of each coating, in gallons of solids per gallon of coating; and
  - d. the volume-weighted average of the total mass of VOC per volume of coating solids for all inside spray coatings employed and for all overvarnish coatings employed [this is calculated by summing the [VOC content (lbs/gallon) x number of gallons of each coating] for all coatings, and then dividing by the summation of the (solids content (gallons/gallon) x number of gallons of each coating) for all coatings] . (These calculations are not required if all inside spray coatings employed and all overvarnish coatings employed have VOC contents equal to or less than the limits specified in 40 CFR, Part 60, Subpart WW, section 60.492(c) and no VOC is added to the coatings during the application or distribution process.)

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system 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 within 30 days after the event occurs.

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#### V. Testing Requirements

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

- a. Emission Limitations:

0.89 kilogram VOC per liter coating solids - inside spray coating  
 0.46 kilogram VOC per liter coating solids - overvarnish  
 4.2 pounds VOC/gallon of coating - inside spray coating  
 2.8 pounds VOC/gallon of coating - overvarnish  
 4.2 pounds VOC/gallon of coating - bottom varnish

Applicable Compliance Method:

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

Any determination of VOC content\*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

\* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

- b. Emission Limitation:  
0.551 lb/hr PE

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{PE rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:  
20% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitations shall be determined in accordance with the test methods specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0372030005 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

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

- 1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage can line (line #2)	OAC rule 3745-31-05 PTI 03-9995	See B.I.2.a, b, & c.

2. **Additional Terms and Conditions**

- a. VOC emissions from the individual coatings shall not exceed the following:

1.

i. coatings:

- (a) interior body coating (inside spray): 38.73 pounds VOC per hour
- (b) overvarnish: 10.90 pounds VOC per hour
- (c) exterior bottom end coating (bottom varnish): 0.73 pound VOC per hour

ii. inks:

- (a) 0.20 pound of VOC per pound of ink (monthly-weighted average),
- (b) 2.94 pounds of VOC per hour

iii. blanket wash:

- (a) 6.55 pounds of VOC per gallon
- (b) 0.4 ton VOC per month
- (c) 121 gallons of cleanup materials per month

- b. Particulate emissions (PE) from the line shall not exceed the following:

- i. 0.313 pound PE per hour, from overspray,
- ii. 0.025 pound PE per hour from oil mist,
- iii. 0.0121 pound PE per hour, from pin oven,
- iv. 0.0346 pound PE per hour, from the IBO, and
- v. 5% opacity, as a six-minute average, from spray operations.

- c. The 38.73 lbs/hr (inside spray coating), 10.9 lbs/hr (overvarnish), 0.73 lbs/hr (bottom varnish), and 2.94 lbs/hr (inks) VOC limitations and the 121 gallons of cleanup materials per month are based on the emissions unit's potentials to emit. Therefore, no record keeping/monitoring and reporting are required to ensure compliance with these limitations.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall maintain monthly records of the cleanup materials usage in this emissions unit, in gallons.
2. The permittee shall each month record and maintain the following information for this emissions unit :
  - a. For the inks:
    - i. the name and identification number of each ink employed;
    - ii. the pounds of VOC per pound of each ink, as applied, excluding water and exempt solvents; and
      - iii the monthly-weighted average of pounds of VOC per pound of ink, as applied, excluding water and exempt solvents.
    - b. For the blanket wash:
      - i. the name and identification number of each cleanup material employed;
      - ii. the mass of VOC per volume of each cleanup material employed (pounds/gallon);
      - iii. the number of gallons of each cleanup material employed; and
      - iv. the total VOC emissions from all cleanup materials employed, in tons.
3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
 

Pollutant: Isopropyl alcohol  
 TLV microgram/cubic meter (ug/m<sup>3</sup>): 983,000  
 Maximum Hourly Emission Rate (lbs/hr): 1.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 43.20  
 MAGLC (ug/m<sup>3</sup>): 23,404.8
4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly allowable VOC emission limitation of 0.4 ton (from blanket wash). All quarterly deviation reports shall be submitted in accordance with paragraph A.3.b of the terms and conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup materials and inks in this emissions unit (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section B.I of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:
    - 0.20 pound VOC per pound ink (monthly-weighted average)
    - 6.55 pounds VOC per gallon - blanket wash

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section B.III.1 of this permit.

Any determination of VOC content\*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

\* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - b. Emission Limitation:
    - 38.73 pounds VOC per hour - interior body coating (inside spray coating)

Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).
  - c. Emission Limitation:
    - 5% opacity, as a 6-minute average

Applicable Compliance Method:  
Compliance with the visible emissions limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
  - d. Emission Limitation:
    - 0.313 lb PE/hr, from overspray

Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with the test methods specified in OAC rule 3745-17-03-(B)(10).
  - e. Emission Limitation:
    - 0.025 lb PE/hr, from oil mist

Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

E = number gallons of oil per hour X 0.028 pound PE per gallon\*

\* This is based on material balance.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

f. Emission Limitations:

0.0121 lb PE/hr, from pin oven  
0.0346 lb PE/hr, from IBO

Applicable Compliance Method:

The hourly allowable PE limitations were established utilizing the following equations:

Pin Oven = maximum hourly gas usage rate (mm cu. ft/hr) X 1.9 lbs PE /mm cu.ft (AP-42, Table 1.4-2)

IBO = maximum hourly gas usage rate (mm cu. ft/hr) X 1.9 lbs PE/mm cu.ft (AP-42, Table 1.4-2)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitations pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

g. Emission Limitation:

10.90 pounds VOC per hour - overvarnish coating

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).

h. Emission Limitation:

0.73 pound VOC per hour - exterior bottom end coating (bottom varnish coating)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).

i. Emission Limitation:

2.94 pounds VOC per hour - inks

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum inks usage rate (gallons/hr) by the maximum VOC content of all the inks (lbs/gallon).

j. Emission Limitation:

121 gallons of cleanup materials per month

Applicable Compliance Method:

The permittee shall demonstrate compliance with the cleanup materials usage restriction based on the record keeping requirements specified in Section B.III.2 of this permit.

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VI. **Miscellaneous Requirements**

1. None

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

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**Facility ID: 0372030005 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

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

1. None.

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

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

<b>Operations, Property, and/or Equipment</b>	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
two-piece aluminum beverage can line (line #3)	OAC rule 3745-21-09 (D)	See A.I.2.a.
	40 CFR, Part 60, Subpart WW	See A.I.2.b.
	OAC rule 3745-17-07	See A.I.2.c.
	OAC rule 3745-17-11	0.551 pound particulate emissions (PE) per hour

2. **Additional Terms and Conditions**

- a. Volatile organic compound (VOC) emissions from the individual coatings shall not exceed the following:
  - (a)
    - i. interior body coating (inside spray coating): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents);
    - ii. overvarnish: 2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents); and
    - iii. exterior bottom end coating (bottom varnish): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents).
  - b. VOC emissions from the individual coatings shall not exceed the following:
    - i. inside spray coating - 0.89 kilogram of VOC per liter of coating solids (7.43 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average; and
    - ii. overvarnish - 0.46 kilogram of VOC per liter of coating solids (3.84 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average.
  - c. 20% opacity, as a six-minute average, except as provided by rule

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II. **Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating, as applied;
  - b. the volume of each coating, in gallons, and the VOC content of each coating, in pounds of VOC per gallon of coating, in pounds of VOC per gallon of coating excluding water and exempt solvents, and in pounds of VOC per gallon of solids, as applied;
  - c. the solids content of each coating, in gallons of solids per gallon of coating; and
  - d. the volume-weighted average of the total mass of VOC per volume of coating solids for all inside spray coatings employed and for all overvarnish coatings employed [this is calculated by summing the [VOC content (lbs/gallon) x number of gallons of each coating] for all coatings, and then dividing by the summation of the (solids content (gallons/gallon) x number of gallons of each coating) for all coatings] . (These calculations are not required if all inside spray coatings employed and all overvarnish coatings employed have VOC contents equal to or less than the limits specified in 40 CFR, Part 60, Subpart WW, section 60.492(c) and no VOC is added to the coatings during the application or distribution process.)

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system 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 within 30 days after the event occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:
    - 0.89 kilogram VOC per liter coating solids - inside spray coating
    - 0.46 kilogram VOC per liter coating solids - overvarnish
    - 4.2 pounds VOC/gallon of coating - inside spray coating
    - 2.8 pounds VOC/gallon of coating - overvarnish
    - 4.2 pounds VOC/gallon of coating - bottom varnish

Applicable Compliance Method:

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

Any determination of VOC content\*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

\* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - b. Emission Limitation:
    - 0.551 lb/hr PE

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).
  - c. Emission Limitation:
    - 20% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emissions limitations shall be determined in accordance with the test methods specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0372030005 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
two-piece aluminum beverage can line (line #3)	OAC rule 3745-31-05 PTI 03-9995	See B.I.2.a, b, & c.

**2. Additional Terms and Conditions**

- a. VOC emissions from the individual coatings shall not exceed the following:
  1. coatings:
    - (a) interior body coating (inside spray): 38.73 pounds VOC per hour
    - (b) overvarnish: 10.90 pounds VOC per hour
    - (c) exterior bottom end coating (bottom varnish): 0.73 pound VOC per hour
  - ii. inks:
    - (a) 0.20 pound of VOC per pound of ink (monthly-weighted average),
    - (b) 2.94 pounds of VOC per hour
  - iii. blanket wash:
    - (a) 6.55 pounds of VOC per gallon
    - (b) 0.4 ton VOC per month
    - (c) 121 gallons of cleanup materials per month
- b. Particulate emissions (PE) from the line shall not exceed the following:
  - i. 0.313 pound PE per hour, from overspray,
  - ii. 0.025 pound PE per hour from oil mist,
  - iii. 0.0121 pound PE per hour, from pin oven,
  - iv. 0.0346 pound PE per hour, from the IBO, and
  - v. 5% opacity, as a six-minute average, from spray operations.
- c. The 38.73 lbs/hr (inside spray coating), 10.9 lbs/hr (overvarnish), 0.73 lbs/hr (bottom varnish), and 2.94 lbs/hr (inks) VOC limitations and the 121 gallons of cleanup materials per month are based on the emissions unit's potentials to emit. Therefore, no record keeping/monitoring and reporting are required to ensure compliance with these limitations.

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**II. Operational Restrictions**

1. None

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

1. The permittee shall maintain monthly records of the cleanup materials usage in this emissions unit, in gallons.
2. The permittee shall each month record and maintain the following information for this emissions unit :
  - a. For the inks:

- i. the name and identification number of each ink employed;
  - ii. the pounds of VOC per pound of each ink, as applied, excluding water and exempt solvents; and
    - iii the monthly-weighted average of pounds of VOC per pound of ink, as applied, excluding water and exempt solvents.
  - b. For the blanket wash:
    - i. the name and identification number of each cleanup material employed;
    - ii. the mass of VOC per volume of each cleanup material employed (pounds/gallon);
    - iii. the number of gallons of each cleanup material employed; and
    - iv. the total VOC emissions from all cleanup materials employed, in tons.
3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Isopropyl alcohol  
 TLV microgram/cubic meter (ug/m<sup>3</sup>): 983,000  
 Maximum Hourly Emission Rate (lbs/hr): 1.09  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 43.20  
 MAGLC (ug/m<sup>3</sup>): 23,404.8
4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly allowable VOC emission limitation of 0.4 ton (from blanket wash). All quarterly deviation reports shall be submitted in accordance with paragraph A.3.b of the terms and conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup materials and inks in this emissions unit (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section B.I of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:
    - 0.20 pound VOC per pound ink (monthly-weighted average)
    - 6.55 pounds VOC per gallon - blanket wash

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section B.III.1 of this permit.

Any determination of VOC content\*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

\* "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.
  - b. Emission Limitation:
    - 38.73 pounds VOC per hour - interior body coating (inside spray coating)

Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).
  - c. Emission Limitation:
    - 5% opacity, as a 6-minute average

Applicable Compliance Method:  
Compliance with the visible emissions limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
  - d. Emission Limitation:
    - 0.313 lb PE/hr, from overspray

Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with the test methods specified in OAC rule 3745-17-03-(B)(10).
  - e. Emission Limitation:
    - 0.025 lb PE/hr, from oil mist

Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$$E = PE \text{ rate (lbs/hr)}$$

$$E = \text{number gallons of oil per hour} \times 0.028 \text{ pound PE per gallon}^*$$

\* This is based on material balance.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.
  - f. Emission Limitations:
    - 0.0121 lb PE/hr, from pin oven
    - 0.0346 lb PE/hr, from IBO

## Applicable Compliance Method:

The hourly allowable PE limitations were established utilizing the following equations:

Pin Oven = maximum hourly gas usage rate (mm cu. ft/hr) X 1.9 lbs PE /mm cu.ft (AP-42, Table 1.4-2)

I/O = maximum hourly gas usage rate (mm cu. ft/hr) X 1.9 lbs PE/mm cu.ft (AP-42, Table 1.4-2)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitations pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

- g. Emission Limitation:  
10.90 pounds VOC per hour - overvarnish coating

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).

- h. Emission Limitation:  
0.73 pound VOC per hour - exterior bottom end coating (bottom varnish coating)

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum VOC content of all the coatings (lbs/gallon).

- i. Emission Limitation:  
2.94 pounds VOC per hour - inks

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the maximum inks usage rate (gallons/hr) by the maximum VOC content of all the inks (lbs/gallon).

- j. Emission Limitation:  
121 gallons of cleanup materials per month

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the cleanup materials usage restriction based on the record keeping requirements specified in Section B.III.2 of this permit.

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VI. **Miscellaneous Requirements**

1. None