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Facility Name: **Crown Cork and Seal Company Inc**

Application Number: **03-1340**

Date: **April 21, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

Facility Name: **Crown Cork and Seal Company Inc**Application Number: **03-1340**Date: **April 21, 1999**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Crown Cork and Seal Company Inc** located in **Wood** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K017 (Mod)	End press line no. 8 (**)	Compliance with terms and conditions in this permit and Ohio EPA Air Toxics Policy	3745-31-05	10.73 pounds VOC/hour, from application of end sealing compound coatings
				1168 pounds VOC/month application of cleanup materials
				27.73 TPY based on a rolling, 12-month summation of monthly VOC input rates (See Additional Special Terms and Conditions) of coatings and cleanup materials
			3745-21-09 (D)(2)(e)	3.7 pounds VOC/gallon excluding water and exempt solvents from application of

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K017 (Mod) Cont'd				end sealing compound coatings
K018 (Mod)	End press line no. 9 (**)	Compliance with terms and conditions in this permit and Ohio EPA Air Toxics Policy	3745-31-05	9.62 pounds VOC/hour, from application of end sealing compound coatings
				1168 pounds VOC/month, from application of cleanup materials
				28.72 TPY based on a rolling, 12-month summation of monthly VOC input rates (See Additional Special Terms and Conditions) of coatings and cleanup materials
			3745-21-09 (D)(2)(e)	3.7 pounds VOC/gallon excluding water and exempt solvents from application of end sealing compound coatings

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K019 (Mod)	End press line no. 10 (**)	Compliance with terms and conditions in this permit and Ohio EPA Air Toxics Policy	3745-31-05	10.73 pounds VOC/hour, from application of end sealing compound coatings 1168 pounds VOC/month from application of cleanup materials 35.92 TPY based on a rolling, 12-month summation of monthly VOC input rates (See Additional Special Terms and Conditions) of coatings and cleanup materials
			3745-21-09 (D)(2)(e)	3.7 pounds VOC/gallon excluding water and exempt solvents from application of end sealing compound coatings
K021 (Mod)	Can assembly line no. 2 (**)	Compliance with terms and conditions in this permit and Ohio EPA Air Toxics Policy	3745-31-05	9.91 pounds VOC/hour, 7.8 TPY from application of side seam coatings

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K021 (Mod) Cont'd				114.1 pounds VOC/month, 0.05 TPY from application of cleanup materials
				0.10 pound PE/hour, 0.44 TPY
			3745-21-09 (D)(2)(d)	5.5 pounds VOC/gallon excluding water and exempt solvents from application of side seam coatings
			3745-17-11 (B)(2)	(*)
			3745-17-07 (A)(1-3)	20 percent opacity except as provided by rule

* The emissions limitations based on this applicable rule are less stringent than the limitations established pursuant to OAC Rule 3745-31-05.

** These modifications were performed in order to remove gallon usage restrictions and revise VOC content restrictions to equal the RACT limits.

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	1.76
VOC	99.38

*Note: VOC emissions represent a 2.2 TPY increase over the current allowable limits for these emissions units (all attributable to emissions unit K017). Particulate emissions (PE) were never addressed in past permits. Increase in PE as a result of these modifications are negligible.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

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Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

General Information

The purpose of this PTI modification is to remove various restrictions from emissions units K017, K018, K019 and K021. This is being done to correct mistakes in these original PTI's as well as maintain consistency among emissions units in the Company's Title V application. A synthetic minor permit was issued for emissions units K017, K018, and K019 in 1994 (PTI no. 03-7249). In order to maintain the federal enforceability established in this permit, conditions are included to restrict the potential-to-emit for these emissions units. These changes are as follows:

- K017: Removal of gallon usage restrictions, elimination of lubricant (company no longer uses this material), increased VOC content restriction to the appropriate RACT limit, and increased total emissions from original permit (03-7249) by 2.2 TPY.
- K018: Identical to K017 with the exception that the annual limit is not changed from the original permit (03-7249).
- K019: Identical to K017 with the exception that the annual limit is not changed from the original permit (03-7249).
- K021: Removal of gallon usage restrictions, increased VOC content restriction to the appropriate RACT limit. Annual limit is unchanged from previous permit (03-6112).

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In place of gallon usage restrictions, comprehensive recordkeeping, reporting, and compliance determination requirements have been added to permit which are similar to all other terms and conditions contained in the Company's Title V permit.

A. Applicable Emissions Limitations and/or Control Requirements

1. The maximum annual VOC emissions from coating/cleanup material usage in emissions unit **K017** shall not exceed 27.73 TPY based upon a rolling, 12-month summation of the monthly VOC input rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Input Level (Coatings and Cleanup)</u>
1	4.44
1-2	8.51
1-3	13.37
1-4	16.23
1-5	20.09
1-6	23.95
1-7	27.73
1-8	27.73
1-9	27.73
1-10	27.73
1-11	27.73
1-12	27.73

2. The maximum annual VOC emissions from coating/cleanup material usage in emissions unit **K018** shall not exceed 28.72 TPY based upon a rolling, 12-month summation of the monthly VOC input rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Input Level (Coatings)</u>
1	4.04
1-2	7.71
1-3	11.17
1-4	14.63
1-5	18.09
1-6	21.55
1-7	25.01
1-8	28.47
1-9	28.72
1-10	28.72
1-11	28.72
1-12	28.72

3. The maximum annual VOC emissions from coating/cleanup material usage in emissions unit **K019** shall not exceed 35.92 TPY based upon a rolling, 12-month summation of the monthly VOC input rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Input Level (Coatings)</u>
1	4.44
1-2	8.51
1-3	12.37
1-4	16.23
1-5	20.09
1-6	23.95
1-7	27.81

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1-8	31.67
1-9	35.53
1-10	35.92
1-11	35.92
1-12	35.92

4. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emission limitations for emissions units K017, K018 and K019 shall be based upon a rolling, 12-month summation of the coating and cleanup material VOC input rates.

B. Operational Restrictions

1. This permit allows for the use of the coating and cleanup materials specified by the permittee in the application for PTI number 03-1340. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation specified in this permit was established in accordance with Ohio EPA's "Air Toxics Policy" and is based on the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for methyl isobutyl ketone and n-hexane based on the Screen3 model and a comparison of the predicted 1-hour maximum ground level concentration to the maximum allowable ground level concentration ("MAGLC"). The following summarizes the results of the modeling for n-hexane and methyl isobutyl ketone (MIBK):

K017, K018, K019

Pollutant: n-Hexane
 TLV (microgram/m³): 176,000
 Maximum Hourly Emission Rate (lbs/hr): 31.08 (*)
 Predicted 1-Hour Max. Concentration (microgram/m³): 1654.0
 MAGLC (microgram/m³): 4190.0

K021

Pollutant: methyl isobutyl ketone
 TLV (microgram/m³): 205,000
 Maximum Hourly Emission Rate (lbs/hr): 9.91 (*)
 Predicted 1-Hour Max. Concentration (microgram/m³): 661.9
 MAGLC (microgram/m³): 4880.95

*Note: These levels represent total emissions and not the incremental increases resulting from the modifications. Although the air toxics policy only requires the incremental increases be modeled, a demonstration of compliance with

the air toxics policy at these levels is acceptable.

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modifications to PTI number 03-1340 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
3. The permittee shall use only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (D)(2)(e) in emissions units K017, K018, K019 and OAC Rule 3745-21-09 (D)(2)(d) in K021 on an "as applied" basis.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K017, K018, K019, and K021:
 - a. the name and identification number of each coating, as applied; and,

- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(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. In order to demonstrate compliance with the annual coating and cleanup material emission limits for emissions units K017, K018, and K019, based upon a rolling, 12-month summation of the VOC input rates, the permittee shall collect and record the following information each month for each emissions unit:

FOR INPUT RATES FROM COATING MATERIAL USAGE IN EACH EMISSIONS UNIT

- a. the Company identification for each coating material employed;
- b. the number of gallons of each coating material employed;
- c. the VOC content of each coating material in lbs VOC/gallon as applied;
- d. the VOC input rate for each coating material in tons/month $[(b) \times (c)/2000]$; and,
- e. the total VOC input rate for all coating materials, in tons/month [summation of (d)].

FOR INPUT RATES FROM CLEANUP MATERIAL USAGE IN EACH EMISSIONS UNIT:

- f. the Company identification of each cleanup material employed (*);
- g. the number of gallons of each cleanup material employed;
- h. the VOC content of each cleanup material, in pounds/gallon;
- i. the VOC input rate for each cleanup material, in tons/month $[(g) \times (h) / 2000]$; and,

- j. the total VOC input rate for all cleanup material, in tons/month [summation of (i)].

THE COMBINED INPUT RATES FROM ALL COATING AND CLEANUP IN EACH EMISSIONS UNIT:

- k. the total VOC input rate for all coatings and cleanup materials, in tons/month [(e) + (j)]; and,
 - l. beginning after the first 12 calendar months of operation following the issuance of this permit, the total VOC input rate/rolling 12-month period [calculated as follows: input/rolling 12-month period = (k) from preceding 11 months + (k) for the current month]. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC input rate for each calendar month.
4. The permittee shall collect and record monthly the following information for emissions unit K021 for the purpose of determining annual VOC emissions from this emissions unit:
- a. the name and identification of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the VOC content of each coating material, in pounds per gallon, as applied;
 - d. the number of gallons of each cleanup material employed;
 - e. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month; and,
 - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year, for the calendar year-to-date.
5. 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, if a strip-chart recorder is employed, for

continuous monitoring instrumentation, and copies of all reports required by the permit. The permittee shall maintain all records in accordance with the requirements of 40 CFR Part 63, section 63.10(b)(1).

D. Reporting Requirements

1. The actual annual VOC emissions data for emissions units K017, K018, K019 and K021 shall be reported pursuant to the fee emissions report required by OAC 3745-78-02(A).
2. The compliance status of the emissions units shall be reported pursuant to the annual certification required by OAC Rule 3745-77-07 (C)(5).
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings in emissions units K017, K018, K019, and K021. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.
4. The permittee shall submit quarterly written reports for emissions units K017, K018, K019, and K021 of (a) any deviations (excursions) from 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 Ohio EPA, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

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a. Emission Limitations

K017:	10.73 lbs	VOC/hour	from	all	coating materials
	1168 lbs	VOC/month	from	all	cleanup materials
K018:	9.62 lbs	VOC/hour	from	all	coating materials
	1168 lbs	VOC/month	from	all	cleanup materials
K019:	10.73 lbs	VOC/hour	from	all	coating materials
	1168 lbs	VOC/month	from	all	cleanup materials
K021:	9.91 lbs	VOC/hour	from	all	coating materials
	114.1 lbs	VOC/month	from	all	cleanup materials

Applicable Compliance Method

These hourly VOC limits for coatings and monthly VOC limits for cleanup operations are based on each emission unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

b. Emission Limitations

K017:	27.73 TPY	based on a rolling, 12-month summation of VOC input rates from all coating and cleanup materials
K018:	28.72 TPY	based on a rolling, 12-month summation of VOC input rates from all coating and cleanup materials
K019:	35.92 TPY	based on a rolling, 12-month summation of VOC input rates from all coating and cleanup materials
K021:	7.8 TPY	from all coating materials
	0.05 TPY	from all cleanup materials

Applicable Compliance Method

The recordkeeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations

K017, K018, K019: 3.7 lbs VOC/gallon excluding water and exempt solvents.

K021: 5.5 lbs VOC/gallon excluding water and exempt solvents.

Applicable Compliance Method

The recordkeeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material 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 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

3. Emission Limitation

K021: 0.10 lb/hr particulate emissions, 0.44 ton/yr

Applicable Compliance Method

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

E = particulate matter emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (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 (60 percent considering 40 CFR 60.453)

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CE = control efficiency of the control equipment
(assumed to be 90 percent)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation

K021: 20 percent opacity as a six minute average except as provided by rule.

Applicable Compliance Method

OAC 3745-17-03(B)(1).

Note: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. Miscellaneous Requirements

1. The preceding requirements supersede all the requirements contained in the following Permits-to-Install: 03-7249 and 03-6112.