☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **16-02406**

A. Source Description

Sonoco-Phoenix Inc. (Brookline plant) is an existing facility located in Green Township, Summit County, that manufactures two and three-piece metal can ends for packaging purposes in various industries. The facility consists of 19 emissions units, which were most recently permitted under PTIs 16-02154 and 16-02359. These emissions units consist of eight conversion presses (K005, K007, K009, K011, K013, K015, K017, and K019), eight blanked end liners (K001, K004, K006, K008, K010, K012, K016, and K018), and three post-repair stations (K020, K021, and K022.) Sonoco-Phoenix proposes to install a new blanked end liner (Liner 107C, K023) and modify the operational restrictions and allowable VOC emissions for its existing emissions units thus superceding PTIs 16-02154 and 16-02359. Sonoco-Phoenix proposes these changes while maintaining the allowable annual emission rates such that the Brookline plant's facility-wide VOC emissions, and individual HAP and combined HAP emissions remain less than major Title V thresholds. In summary, the changes are:

1. Installation of a new blanked end liner (Liner 107C) to be Emissions Unit K023. The hourly VOC emission limit for this new emissions unit will be 1.13 pounds per hour. The annual VOC emission limit for this new emissions unit will be 4.95 tons per year. VOC emissions from Liner 107C will be captured and vented to an existing regenerative thermal oxidizer (RTO). This PTI will include the operational restriction that prohibits operation of this emissions unit without operation of the VOC capture system and RTO.

2. A proposed increase in the hourly VOC emission limit for emissions units K001, K004, K006, K008, and K012 from 3.5 pounds per hour to 3.62 pounds per hour. The proposed increase in hourly VOC emissions is due to an increase in the per-end coating application rate.

3. A proposed increase in the annual VOC emission limit for emissions units K001, K004, K006, K008, and K012 from 15.3 tons per year to 15.9 tons per year. The proposed increase in hourly VOC emissions is due to an increase in the per-end coating application rate.

4. A proposed increase in the hourly VOC emission limit for emissions unit K010 from 0.70 pound per hour to 0.78 pound per hour. The proposed increase in hourly VOC emissions is due to an increase in the per-end coating application rate. A change in the annual VOC limit of 3.1 tons per year is not proposed.

5. A proposed increase in the annual VOC emission limit for emissions unit K018 from 15.3 tons per year to 25.4 tons per year. The proposed increase in annual VOC emissions is due to an increase in the per-end coating application rate. A change in the hourly VOC limit of 5.8 pounds per hour is not proposed.

Other modifications will be made to the relevant conditions of PTIs 16-02154 and 16-02359 to be consistent with the proposed facility-wide VOC emission limit of 92.34 tons per year.

B. Facility Emissions and Attainment Status

The facility will emit VOC, combined HAPs, and individual HAPs from the above-mentioned sources. If Sonoco-Phoenix were to operate at the maximum hourly throughput of materials and for an entire calendar year, the total facility VOC emissions would be 191.52 tons, the

highest individual HAP emissions would be 8.85 tons, and combined total HAP emissions would be 16.51 tons.

C. Source Emissions

Sonoco-Phoenix has agreed to restrict their facility's emissions to 92.34 tons of VOC, 9.0 tons for each individual HAP, and 24.0 tons for combined HAPs per 12-month period. This PTI will contain terms and conditions to limit Sonoco-Phoenix to the above identified emission limitations.

D. Conclusion

The terms and conditions in this Permit to Install will limit the facility's VOC, individual HAP, and combined HAP emissions to less than Title V thresholds, and will allow the facility to be classified as an area source for HAP emissions. Sonoco-Phoenix shall maintain monthly records of emissions and actual coating usage. Excursion reports will be required for each emissions unit to ensure compliance.

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
SUMMIT COUNTY
Application No: 16-02406
Fac ID: 1677000223

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/30/2005

Sonoco-Phoenix Inc Brookline Plant
Brent Bowers
3075 Brookline Rd
North Canton, OH 44720

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **ARAQMD** **Akron Metro. Area Trans. Study** **WV** **PA**

SUMMIT COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **16-02406** FOR AN AIR CONTAMINANT SOURCE FOR
Sonoco-Phoenix Inc Brookline Plant

On 8/30/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sonoco-Phoenix Inc Brookline Plant**, located at **3075 Brookline Rd, North Canton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02406:

Liner 107C, End Liner. Revision of Synthetic Minor Limitations.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

DRAFT PERMIT TO INSTALL 16-02406

Application Number:	16-02406
Facility ID:	1677000223
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Sonoco-Phoenix Inc Brookline Plant
Person to Contact:	Brent Bowers
Address:	3075 Brookline Rd North Canton, OH 44720

Location of proposed air contaminant source(s) [emissions unit(s)]:
3075 Brookline Rd
North Canton, Ohio

Description of proposed emissions unit(s):
Liner 107C, End Liner. Revision of Synthetic Minor Limitations.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. 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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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. 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 the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	92.34
Individual HAP	9.0
Combined HAP	24.0

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Blanked end liner 101: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.9 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of

the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.2 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

4. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

5. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

6. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.5 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

7. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

8. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

9. By limiting the coating and cleanup usage in accordance with B.2 and B.5, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

4. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup 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: n-hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.98
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,059
MAGLC (ug/m3): 4,190

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 for 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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-

04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8,760 per year, and divide by the conversion factor of 2,000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating,

the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating or ink to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restrictions B.2 and B.5 shall be determined in accordance with the following method:

a. Operational Restriction:

The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K004 - Blanked end liner 102: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.9 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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2. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.2 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

4. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

5. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

6. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.5 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

7. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

8. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

9. By limiting the coating and cleanup usage in accordance with B.2 and B.5, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

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g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K004) was evaluated based on the actual materials (typically coatings and cleanup 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: n-hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.98
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,059
MAGLC (ug/m3): 4,190

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee

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determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restrictions B.2 and B.5 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.
Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

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The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K005 - Conversion press 102 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.4 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum combined daily tab lubricant and rust inhibitor usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 6.41 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K005) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

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a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.4 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 6.41 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee

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determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum combined daily tab lubricant and rust inhibitor usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

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The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - Blanked end liner 103: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.9 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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2. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.2 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

4. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

5. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

6. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.5 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

7. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

8. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

9. By limiting the coating and cleanup usage in accordance with B.2 and B.5, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

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g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K006) was evaluated based on the actual materials (typically coatings and cleanup 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: n-hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.98
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,059
MAGLC (ug/m3): 4,190

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

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Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee

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determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restrictions B.2 and B.5 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.
Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

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The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K007 - Conversion press 103 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K007) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

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The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K008 - Blanked end liner 104: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.9 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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2. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.2 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

4. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

5. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

6. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.5 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

7. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

8. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

9. By limiting the coating and cleanup usage in accordance with B.2 and B.5, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

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g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K008) was evaluated based on the actual materials (typically coatings and cleanup 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: n-hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.98
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,059
MAGLC (ug/m3): 4,190

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 3.62 pounds per hour, nor 15.9 tons per year.

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Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee

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determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restrictions B.2 and B.5 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

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The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K009 - Conversion press 104 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K009) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

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The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K010 - Blanked end liner 105: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.c, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.10 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.78 pounds per hour, nor 3.1 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

2.c The permittee shall install, calibrate, operate and maintain a monitoring device to measure the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO.

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B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. The permittee shall employ a regenerative thermal oxidizer when this emissions unit is in operation and employing solvent-based coatings. The permittee shall not be required to employ a regenerative thermal oxidizer when this emissions unit is in operation and employing water-based end seal coatings. The capture and control system shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons

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1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons

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1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

11. The permittee shall maintain the air flow in the air duct from this emissions unit at a pressure of not less than 0.250 inches of water as a one hour average at all times while this emissions unit is in operation and employing solvent-based end seal compound.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

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2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

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n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and employing solvent-based coatings. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

5. The permittee shall collect and record the following information for each day for the control equipment:

a. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit, and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation and employing solvent-based coatings, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. the calculated, controlled and uncontrolled (when employing water-based coatings) VOC emission rate from all coatings and cleanup materials, in pounds or tons; and

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b. the total controlled and uncontrolled (when employing water-based coatings) VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

7. The permit to install for this emissions unit (K010) was evaluated based on the actual materials (typically coatings and cleanup 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: MIBK
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 2.02
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 964
MAGLC (ug/m3): 4,881

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 for 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

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modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

8. 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.

9. The permittee shall install, calibrate, operate and maintain a monitoring device to continuously measure and record the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO. The velocity pressure monitoring and recording device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and specifications.

The permittee shall maintain records of any occurrence during which the velocity pressure in the air duct from this emissions unit is less than 0.250 inches of water as a one-hour average when employing solvent-based coatings and the operation of the emissions unit was not discontinued within one hour of the occurrence.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation and employing solvent-based coatings, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

5. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

6. The permittee shall submit quarterly deviation (excursion) reports that identify all occurrences during which the velocity pressure in the air duct from this emissions unit was less than 0.250 inches of water as a one-hour average when employing solvent-based coatings and the operation of the emissions unit was not discontinued within one hour of the occurrence.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.78 pounds per hour, nor 3.1 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

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b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restriction B.2 shall be determined in accordance with the following method:

a. Operational Restriction:
Not less than eight one per cent reduction, by weight, in the overall VOC emissions from the coating line; control efficiency not less than ninety per cent, by weight.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(1) The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

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(2) The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

(3) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below.. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(4) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

(5) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the

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overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K011 - Conversion press 105 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K011) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

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The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K012 - Blanked end liner 107: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.9 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 3.9 pounds per hour, nor 17.0 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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2. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.2 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

4. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

5. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not

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controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

6. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.5 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

7. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

8. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

9. By limiting the coating and cleanup usage in accordance with B.2 and B.5, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

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g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K012) was evaluated based on the actual materials (typically coatings and cleanup 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: n-hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.98
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,059
MAGLC (ug/m3): 4,190

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 3.9 pounds per hour, nor 17.0 tons per year.

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Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee

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determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restrictions B.2 and B.5 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

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The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K013 - Conversion press 107 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K013) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

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The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K015 - Conversion press 101 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K015) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

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The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K016 - Blanked end liner 106: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.c, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.10 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.9 pounds per hour, nor 4.0 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

2.c The permittee shall install, calibrate, operate and maintain a monitoring device to measure the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO.

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B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. When solvent based coatings are in use for this emissions unit, the permittee shall employ a regenerative thermal oxidizer. The capture and control system shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment. When isopropyl alcohol and water-based coatings are in use for this emissions unit, the exhaust gases can be vented directly to the atmosphere. While water-based coatings are in use, they shall contain zero VOC, and the cleanup material shall be the only source of VOC emissions.

3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons

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1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons

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1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

11. The permittee shall maintain the air flow in the air duct from this emissions unit at a pressure of not less than 0.100 inches of water as a one hour average at all times while this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

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2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

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n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

5. The permittee shall collect and record the following information for each day for the control equipment:

a. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. the calculated, controlled VOC emission rate from all coatings and cleanup materials, in pounds or tons; and

b. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

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7. The permit to install for this emissions unit (K016) was evaluated based on the actual materials (typically coatings and cleanup 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: MIBK
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 2.02
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 964
MAGLC (ug/m3): 4,881

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 for 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.

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8. 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.

9. The permittee shall install, calibrate, operate and maintain a monitoring device to continuously measure and record the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO. The velocity pressure monitoring and recording device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and specifications.

The permittee shall maintain records of any occurrence during which the velocity pressure in the air duct from this emissions unit is less than 0.100 inches of water as a one-hour average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees

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Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

5. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

6. The permittee shall submit quarterly deviation (excursion) reports that identify all occurrences during which the velocity pressure in the air duct from this emissions unit was less than 0.100 inches of water as a one-hour average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.9 pounds per hour, nor 4.0 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

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b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restriction B.2 shall be determined in accordance with the following method:

a. Operational Restriction:
Not less than eight one per cent reduction, by weight, in the overall VOC emissions from the coating line; control efficiency not less than ninety per cent, by weight.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(1) The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

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(2) The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

(3) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below.. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(4) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

(5) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the

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overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K017 - Conversion press 106 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K017) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

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The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K018 - Blanked end liner 108: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.9 below.
	OAC rule 3745-21-09(D)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 5.8 pounds per hour, nor 25.4 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018,

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and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

3. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.2 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

4. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

5. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC

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material usage figures. Note: These unit are controlled when applying VOC containing material.

6. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.5 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

7. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

8. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

9. By limiting the coating and cleanup usage in accordance with B.2 and B.5, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

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g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K018) was evaluated based on the actual materials (typically coatings and cleanup 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: n-hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.98
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,059
MAGLC (ug/m3): 4,190

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 5.8 pounds per hour, nor 25.4 tons per year.

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Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee

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determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restrictions B.2 and B.5 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

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The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K019 - Conversion press 108 for 2- and 3-piece can ends (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.2 through B.10 below.
	OAC rule 3745-21-09(U)(2)(e)	See B.1 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

B. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

2. The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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3. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

4. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

5. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

6. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023

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shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

7. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

8. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

9. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

10. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation;

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average); and

f. the total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

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f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

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4. The permit to install for this emissions unit (K019) was evaluated based on the actual materials (typically coatings and cleanup 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: naphtha/mineral spirits
TLV (mg/m3): 525 (as Stoddard solvent)
Maximum Hourly Emission Rate (lbs/hr): 4.69
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,305
MAGLC (ug/m3): 12,500

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 for 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.

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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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

5. 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 coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 0.75 pounds per hour, nor 3.3 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 5.74 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

f. Operational Restriction:
The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

Applicable Compliance Method:
Daily records shall be maintained of the total daily usage of all coatings employed in this emissions unit in accordance with C.1 above.

2. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

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The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K020 - Post repair spray 105 for coating the inside score line of easy-open can ends. (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.c, and B.3 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(a) and OAC rule 3745-21-09(B)(6).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.11 below.
	OAC rule 3745-21-09(U)(1)(a)	See B.1 and B.2 below.
	OAC rule 3745-21-09(B)(6)	See B.3 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.8 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

2.c The permittee shall install, calibrate, operate and maintain a monitoring device to measure the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO.

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B. Operational Restrictions

1. The permittee shall comply with the requirements of OAC rule 3745-21-09(B)(6).

2. The permittee shall not permit the use of coatings that are in excess of 10.3 pounds of VOC per gallon of solids, excluding water and exempt solvents.

3. The permittee shall employ a regenerative thermal oxidizer. The capture and control system shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

4. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.4 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons

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1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

6. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

7. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

8. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.7 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons

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1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

9. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

10. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

11. By limiting the coating and cleanup usage in accordance with B.4 and B.7, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

12. The permittee shall maintain the air flow in the air duct from this emissions unit at a pressure of not less than 0.250 inches of water as a one hour average at all times while this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

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2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

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n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

5. The permittee shall collect and record the following information for each day for the coating line and control equipment:

a. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

b. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

c. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied, and from all cleanup materials. The controlled VOC emission rate shall be calculated using (I) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (b) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

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d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

e. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. the calculated, controlled VOC emission rate from all coatings and cleanup materials, in pounds or tons;

b. the total volume of solids from all the coatings employed, in gallons;

c. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and

d. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

7. The permit to install for this emissions unit (K020) was evaluated based on the actual materials (typically coatings and cleanup 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: MIBK
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 2.02
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 964
MAGLC (ug/m3): 4,881

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

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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 for 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.

8. 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.

9. The permittee shall install, calibrate, operate and maintain a monitoring device to continuously measure and record the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO. The velocity pressure monitoring and recording device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and specifications.

The permittee shall maintain records of any occurrence during which the velocity pressure in the air duct from this emissions unit is less than 0.250 inches of water as a one-hour

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average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

5. 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 calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. 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 45 days after the exceedance occurs.

6. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

7. The permittee shall submit quarterly deviation (excursion) reports that identify all occurrences during which the velocity pressure in the air duct from this emissions unit was less than 0.250 inches of water as a one-hour average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.8 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 10.3 pounds of VOC per gallon of solids, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restriction B.3 shall be determined in accordance with the following method:

a. Operational Restriction:
Not less than eight one per cent reduction, by weight, in the overall VOC emissions from the coating line; control efficiency not less than ninety per cent, by weight.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(1) The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

(2) The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

(3) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below.. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(4) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

(5) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining

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Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with Operational Restrictions B.4 and B.7 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

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The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K021 - Post repair spray 106 for coating the inside score line of easy-open can ends. (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.c, and B.3 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(a) and OAC rule 3745-21-09(B)(6).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.11 below.
	OAC rule 3745-21-09(U)(1)(a)	See B.1 and B.2 below.
	OAC rule 3745-21-09(B)(6)	See B.3 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.8 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

2.c The permittee shall install, calibrate, operate and maintain a monitoring device to measure the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO.

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B. Operational Restrictions

1. The permittee shall comply with the requirements of OAC rule 3745-21-09(B)(6).

2. The permittee shall not permit the use of coatings that are in excess of 10.3 pounds of VOC per gallon of solids, excluding water and exempt solvents.

3. The permittee shall employ a regenerative thermal oxidizer. The capture and control system shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

4. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.4 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons

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1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

6. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

7. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material..

8. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.7 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons

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1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

9. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

10. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

11. By limiting the coating and cleanup usage in accordance with B.4 and B.7, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

12. The permittee shall maintain the air flow in the air duct from this emissions unit at a pressure of not less than 0.250 inches of water as a one hour average at all times while this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

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2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

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n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

5. The permittee shall collect and record the following information for each day for the coating line and control equipment:

a. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

b. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

c. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied, and from all cleanup materials. The controlled VOC emission rate shall be calculated using (I) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (b) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

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d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

e. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. the calculated, controlled VOC emission rate from all coatings and cleanup materials, in pounds or tons;

b. the total volume of solids from all the coatings employed, in gallons;

c. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and

d. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

7. The permit to install for this emissions unit (K021) was evaluated based on the actual materials (typically coatings and cleanup 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: MIBK
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 2.02
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 964
MAGLC (ug/m3): 4,881

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

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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 for 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.

8. 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.

9. The permittee shall install, calibrate, operate and maintain a monitoring device to continuously measure and record the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO. The velocity pressure monitoring and recording device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and specifications.

The permittee shall maintain records of any occurrence during which the velocity pressure in the air duct from this emissions unit is less than 0.250 inches of water as a one-hour

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average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

5. 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 calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. 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 45 days after the exceedance occurs.

6. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

7. The permittee shall submit quarterly deviation (excursion) reports that identify all occurrences during which the velocity pressure in the air duct from this emissions unit was less than 0.250 inches of water as a one-hour average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.8 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 10.3 pounds of VOC per gallon of solids, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restriction B.3 shall be determined in accordance with the following method:

a. Operational Restriction:
Not less than eight one per cent reduction, by weight, in the overall VOC emissions from the coating line; control efficiency not less than ninety per cent, by weight.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(1) The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

(2) The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

(3) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below.. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(4) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

(5) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the

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request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with Operational Restrictions B.4 and B.7 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are

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equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K022 - Post repair spray 107 for coating the inside score line of easy-open can ends. (Modification)	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.c, and B.3 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(a) and OAC rule 3745-21-09(B)(6).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.11 below.
	OAC rule 3745-21-09(U)(1)(a)	See B.1 and B.2 below.
	OAC rule 3745-21-09(B)(6)	See B.3 below.

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.8 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

2.c The permittee shall install, calibrate, operate and maintain a monitoring device to measure the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO.

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B. Operational Restrictions

1. The permittee shall comply with the requirements of OAC rule 3745-21-09(B)(6).

2. The permittee shall not permit the use of coatings that are in excess of 10.3 pounds of VOC per gallon of solids, excluding water and exempt solvents.

3. The permittee shall employ a regenerative thermal oxidizer. The capture and control system shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

4. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.4 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons
1-8	33,693 gallons

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1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

6. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

7. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

8. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.7 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons
1-9	25,593 gallons

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1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

9. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

10. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

11. By limiting the coating and cleanup usage in accordance with B.4 and B.7, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

12. The permittee shall maintain the air flow in the air duct from this emissions unit at a pressure of not less than 0.250 inches of water as a one hour average at all times while this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

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2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

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n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

5. The permittee shall collect and record the following information for each day for the coating line and control equipment:

a. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

b. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

c. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied, and from all cleanup materials. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (b) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

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d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

e. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. the calculated, controlled VOC emission rate from all coatings and cleanup materials, in pounds or tons;

b. the total volume of solids from all the coatings employed, in gallons;

c. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and

d. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

7. The permit to install for this emissions unit (K022) was evaluated based on the actual materials (typically coatings and cleanup 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: MIBK
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 2.02
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 964
MAGLC (ug/m3): 4,881

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

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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 for 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.

8. 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.

9. The permittee shall install, calibrate, operate and maintain a monitoring device to continuously measure and record the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO. The velocity pressure monitoring and recording device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and specifications.

The permittee shall maintain records of any occurrence during which the velocity pressure in the air duct from this emissions unit is less than 0.250 inches of water as a one-hour

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average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

5. 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 calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. 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 45 days after the exceedance occurs.

6. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

7. The permittee shall submit quarterly deviation (excursion) reports that identify all occurrences during which the velocity pressure in the air duct from this emissions unit was less than 0.250 inches of water as a one-hour average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

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E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 1.1 pounds per hour, nor 4.8 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 10.3 pounds of VOC per gallon of solids, excluding water and exempt solvents.

Applicable Compliance Method:

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Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restriction B.3 shall be determined in accordance with the following method:

a. Operational Restriction:
Not less than eight one per cent reduction, by weight, in the overall VOC emissions from the coating line; control efficiency not less than ninety per cent, by weight.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(1) The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

(2) The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

(3) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(4) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

(5) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the

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request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with Operational Restrictions B.4 and B.7 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are

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equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K023 - Blanked end liner 107C: Spray application of an end seal compound to the inner lip seal of unfinished 2- and 3-piece can ends. (New Emissions Unit)	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.c, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See A.2.b, and B.1 through B.10 below.
	OAC rule 3745-21-09(D)(2)(e)	

2. Additional Terms and Conditions

2.a Volatile organic compound emissions from this emissions unit shall not exceed 1.13 pounds per hour, nor 4.95 tons per year.

2.b The combined annual emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed the following as rolling, 12-month summations:
92.34 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP); and
9.0 tons of any individual HAP.

2.c The permittee shall install, calibrate, operate and maintain a monitoring device to measure the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO.

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B. Operational Restrictions

1. The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents. The permittee shall not permit the use of cleanup solvents that are in excess of 5.6 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. The permittee shall employ a regenerative thermal oxidizer. The capture and control system shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

3. The permittee shall not allow the operation of this emissions unit concurrent with the operation of Emissions Unit K022.

4. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K001, K004, K005, K006, K007, K008, K009, K011, K012, K013, K015, K017, K018, and K019 shall not exceed 44,924 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These units are uncontrolled when applying VOC containing material.

5. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the uncontrolled emission units, listed in Section B.3 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	11,231 gallons
1-2	11,231 gallons
1-3	11,231 gallons
1-4	22,462 gallons
1-5	22,462 gallons
1-6	22,462 gallons
1-7	33,693 gallons

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1-8	33,693 gallons
1-9	33,693 gallons
1-10	44,924 gallons
1-11	44,924 gallons
1-12	44,924 gallons

6. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

7. The maximum annual VOC material usage (includes coating and cleanup) for emissions units K010 (not controlled when applying water-based end seal compound), K016 (not controlled when applying water-based end seal compound), K020, K021, K022, and K023 shall not exceed 34,125 gallons, based upon a rolling, 12-month summation of the VOC material usage figures. Note: These unit are controlled when applying VOC containing material.

8. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC material usage levels in the controlled emission units, listed in Section B.6 above, as specified in the following table:

month(s)	**Maximum Allowable Cumulative VOC Material Usage (includes coating and cleanup)**
1	8,531 gallons
1-2	8,531 gallons
1-3	8,531 gallons
1-4	17,062 gallons
1-5	17,062 gallons
1-6	17,062 gallons
1-7	25,593 gallons
1-8	25,593 gallons

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1-9	25,593 gallons
1-10	34,125 gallons
1-11	34,125 gallons
1-12	34,125 gallons

9. After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage (includes coating and cleanup) limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

10. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9* TPY for any single HAP and 24* TPY for any combination of HAPs, based upon rolling, 12-month summations.

* The amount of HAPs used are more than the amount of HAPs emitted, because HAPs emissions are controlled by means of a regenerative thermal oxidizer, for emissions units K010 and K016 (when applying solvent based coatings), K020, K021, K022, and K023.

11. By limiting the coating and cleanup usage in accordance with B.3 and B.6, the entire facility will emit VOC, individual HAPs and combined HAPs at a level that is below the Title V thresholds. A PTI modification may be required prior to any coating reformulation involving increased VOC or HAP content at the facility.

12. The permittee shall maintain the air flow in the air duct from this emissions unit at a pressure of not less than XXX inches of water as a one hour average at all times while this emissions unit is in operation. The value for XXX shall be determined in the compliance test required in Condition E.2.a.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

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e. the average hourly VOC emission rates for all coatings and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 through K013, and K015 through K023:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

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m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n. the rolling, 12-month summation of individual HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o. the rolling, 12-month summation of the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Akron Regional Air Quality Management District. This information does not have to be kept on a line-by-line basis.

3. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month for the controlled and uncontrolled units. After the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain a record of the rolling, cumulative coating and cleanup material usage for the previous 12 calendar months, for both the uncontrolled and controlled units.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

5. The permittee shall collect and record the following information for each day for the control equipment:

a. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit, and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

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a. the calculated, controlled VOC emission rate from all coatings and cleanup materials, in pounds or tons; and

b. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

7. The permit to install for this emissions unit (K023) was evaluated based on the actual materials (typically coatings and cleanup 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: MIBK
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 2.02
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 964
MAGLC (ug/m3): 4,881

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 for 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

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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.

8. 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.

9. The permittee shall install, calibrate, operate and maintain a monitoring device to continuously measure and record the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO. The velocity pressure monitoring and recording device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and specifications.

The permittee shall maintain records of any occurrence during which the velocity pressure in the air duct from this emissions unit is less than XXX inches of water as a one-hour average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the VOC material usage limits (includes coating and cleanup), the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAPs, combined HAPs, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

5. The permittee shall submit annual reports which specify the VOC material usage (includes coating and cleanup), the VOC, total HAP, and individual HAP emissions, in tons, for K001, K004 through K013, and K015 through K023.

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

6. The permittee shall submit quarterly deviation (excursion) reports that identify all occurrences during which the velocity pressure in the air duct from this emissions unit was less than XXX inches of water as a one-hour average and the operation of the emissions unit was not discontinued within one hour of the occurrence.

E. Testing Requirements

1. Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitation:
Volatile organic compound emissions from this emissions unit shall not exceed 1.13 pounds per hour, nor 4.95 tons per year.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 8760 per year, and divide by the conversion factor of 2000 pounds per ton.

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b. Emission Limitation:
The combined annual volatile organic compounds (VOC) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 92.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:
The combined annual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 24.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:
The annual individual hazardous air pollutants (HAPs) emissions from the entire facility (K001, K004 through K013, and K015 through K023) shall not exceed 9.0 tons as a rolling, 12-month summation.

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Applicable Compliance Method:
Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

e. Emission Limitation:
The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents. The permittee shall not permit the use of cleanup materials that are in excess of 5.6 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:
Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, in accordance with C.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with Operational Restriction B.2 shall be determined in accordance with the following method:

a. Operational Restriction:
Not less than eight one per cent reduction, by weight, in the overall VOC emissions from the coating line; control efficiency not less than ninety per cent, by weight.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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(1) The emission testing shall be conducted during the first 12 calendar months of operation following the issuance of this permit to install.

(2) The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOCs.

(3) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOCs, Method 25 or 25A (whichever is appropriate) of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC'S are specified below.. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(4) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

(5) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the

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emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with Operational Restrictions B.3 and B.6 shall be determined in accordance with the following method:

a. Operational Restriction:
The maximum annual VOC material usage (includes coating and cleanup), based upon a rolling, 12-month summation, shall not exceed:

for uncontrolled units, 44,924 gallons;
for controlled units, 34,125 gallons.

The maximum annual VOC material usage restrictions, the corresponding VOC content restrictions, and the control device requirements (for applicable units), are equivalent to a facility-wide VOC emission rate of 92.34 TPY, a facility-wide individual HAP emission rate of 9.0 TPY, and a facility-wide combined HAP emission rate of 24.0.

Applicable Compliance Method:
To comply with the VOC material usage rate limitation above, the permittee shall maintain daily records, on a monthly basis for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

To comply with the facility-wide emission limitations above, the permittee shall maintain the records for each coating line, as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and as summarized below:

The VOC and HAPs emission rates for each uncontrolled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements.

The VOC and HAPs emission rates for each controlled coating line are calculated by multiplying the VOC and HAPs contents for each VOC-containing and HAPs-containing material employed on the emissions unit by the usage of that VOC-

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containing and HAPs-containing material (includes coating and cleanup) based upon a rolling 12-month summation and as required above in Term and Condition C, Monitoring and/or Recordkeeping Requirements, and multiplying by one minus the overall destruction and removal efficiency measured during the most recent stack test that demonstrated compliance.

The facility-wide VOC emission rate is calculated by summing the VOC emissions rates for all coating lines as described above.

The facility-wide individual HAPs emission rate is calculated by summing the individual HAPs emissions rates for all coating lines as described above.

The facility-wide combined HAPs emission rate is calculated by summing the combined HAPs emissions rates for all coating lines as described above.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install number 16-02154, as issued on May 4, 2002, and Permit to Install No. 16-02359, as issued on October 14, 2004.

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