

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **04-01439**

A. Source Description

This PTI is for the modification of the Line 2 beverage can coating line to allow for the production of 24-ounce cans. The line currently produces 8-ounce and 12-ounce beverage cans, and this modification will allow for the production of 8-ounce, 12-ounce, or 24-ounce cans. Rexam proposes to modify Line 2 in two phases.

Line 2 consists of the following equipment: a continuous motion coater followed by a coater oven, which will not be physically altered under this PTI because the 24-ounce beverage cans are not basecoated; a continuous motion printer followed by a deco oven, which will be modified to allow for the production of 24-ounce beverage cans; and an interior body sprayer followed by an interior bake oven, which will be modified to allow for the production of 24-ounce beverage cans. The necker/flanger is not included in K010 because it is not an air contaminant source.

Phase I

Under Phase I of the Line 2 modification, the continuous motion printer and deco oven and the interior body sprayer and interior body oven will be modified to allow for the production of 8-ounce, 12-ounce, and 24-ounce beverage cans. Because the line 3 modification under PTI 04-01379 (issued 1/20/2005) which allowed the production of 24-ounce cans on line 3 can be considered part of the same project for the proposed modifications to line 2, to avoid nonattainment NSR, Rexam must limit production practices to stay below the 40 tons per year net emission increase threshold. Under the line 3 modification, Rexam increased net VOC emissions by 34.81 tons. Therefore, the line 2 modifications must stay below a 5.19 tons net emission increase. To achieve this, the facility will limit the gallons of solids coating applied to the cans on line 2. Phase I proposes a net contemporaneous emission increase of 39.88 tons/yr VOC.

Phase II (Phase II is not included in this modification. Phase II will be done in a separate PTI action)

Under Phase II of the Line 2 modification, the facility will install a new regenerative thermal oxidizer as pollution control equipment and will then bring line 2 up to full production capacity without increasing VOC emissions.

B. Facility Emissions and Attainment Status

The facility is currently a major source of VOC emissions. The facility has taken voluntary restrictions on the HAPs emissions (PTI 04-01429 issued on 11/29/2005).

<u>Pollutant</u>	<u>Significant Net Emission Increase Levels</u>	<u>Attainment Status</u>
PM ₁₀	25 TPY	unclassifiable
SO ₂	40 TPY	attainment
VOC	40 TPY	1-hr attainment/8-hr non-attainment
NO _x	40 TPY	unclassifiable/attainment
CO	100 TPY	unclassifiable/attainment

C. Source Emissions

1. Continuous Motion Base Coating operation (from PTI 04-01379, issued 1/20/2005)

Because 24-ounce beverage cans are not basecoated, the basecoat coating line calculations are based only on the production of 8-ounce and 12-ounce beverage cans. The emissions from the basecoater were limited to 5.00 tons per year under PTI 04-01379 (issued 1/20/2005). The following emission calculations for the basecoater and pin oven are based on the coating data Rexam provided in the application for PTI 04-01379. All of the coating data has remained the same. The allowable gallons of coating usage has been reduced because at times Line 2 will produce 24-ounce cans and the basecoater will not be in use. By reducing the amount of coating usage, the gallons of coating solids and VOC emissions are reduced on the basecoater. This reduction will allow Rexam to produce more 24-ounce cans on the line.

a. **Basecoat coating spray emissions**

Tons per Year VOC emission limit calculations:

The following basecoat coating data was provided by Rexam:

Volume % solids: 40.9

VOC content: 1.8 lb/gal, excluding water & exempt solvents & 2.4 lb VOC/gal solids

Maximum coating application rate: 6.22 gallons of coating applied per hour

The potential to emit (PTE) can be calculated from this information:

VOC emissions = 6.22 gal coating applied/hr (0.409 gal solids/gal coating)(2.4 lb VOC/gal solids) = 6.11 lb VOC/hr

Potential Annual Emissions: 6.11 lb VOC/hr (8760 hrs/hr)/(2000 lbs/ton) =
26.77 tons VOC per year

Under PTI 04-01379, Rexam volunteered to limit the coating usage, thereby restricting the annual VOC emissions from the basecoat coating line:

Old Allowable Coating usage: 10,181 gallons

Old Restricted Annual Emissions: VOC emissions = 10,181 gal coating/yr
(0.409 gal solids/gal coating)(2.4 lb
VOC/gal solids) / (2000 lb/ton) = 5.00
tons/yr

Because Rexam wants to keep the VOC emission increase below the 40 tons per year threshold, the allowable coating usage had to be further reduced from the limit established in PTI 04-01379. 4.71 tons per year, was selected as a new restricted annual emission limit and this value was used to establish the allowable coating usage.

Allowable Solids Coating Usage:

$(4.71 \text{ tons VOC})(2,000 \text{ lbs/gal}) / (2.4 \text{ lb VOC/gal solids}) = 3,925 \text{ gal solids applied/yr}$

New Restricted Annual Emissions:

$(3,925 \text{ gal})(2.4 \text{ lb VOC/gals})(1 \text{ ton}/2,000 \text{ lbs}) = 4.71 \text{ tons of solids applied per year}$

b. **Basecoater pin oven emissions**

Tons per Year VOC emission limit calculations:

The basecoater pin oven emissions were based on the maximum fuel usage rating of 3.0 mmBtu/hr as provided by Rexam in the application for PTI 04-01379 (issued 1/20/2005). The PTE was calculated and then emissions were adjusted for the coating usage restriction.

CO	$84 \text{ lb/mmBtu}(3.0 \text{ mmBtu/hr}) / (1020 \text{ mmBtu/mmBtu}) = 0.25 \text{ lb/hr} = 1.10 \text{ tons/yr}$
NOx	$100 \times 3.0/1020 = 0.30 \text{ lb/hr} = 1.32 \text{ tons/yr}$
PE	$1.9 \times 3.0/1020 = 0.01 \text{ lb/hr} = 0.05 \text{ ton/yr}$
PM10	$7.6 \times 3.0/1020 = 0.03 \text{ lb/hr} = 0.13 \text{ ton/yr}$
SO2	$0.6 \times 3.0/1020 = 0.01 \text{ lb/hr} = 0.05 \text{ ton/yr}$
VOC	$5.5 \times 3.0/1020 = 0.02 \text{ lb/hr} = 0.09 \text{ ton/yr}$

Total allowable VOC emissions for continuous motion base coater (2.a) and pin oven (2.b) are:

VOC $6.11 \text{ lb/hr} + 0.02 \text{ lb/hr} = 6.13 \text{ lb/hr}$
VOC $4.71 \text{ tpy} + 0.09 \text{ tpy} = 4.8 \text{ tpy}$

2. Continuous motion printer & pin oven emissions

a. **Continuous Motion Printer**

Tons per Year VOC emission limit calculations:

The following coating/clean-up material data was provided by Rexam:

Over varnish:	8.05 gal coating applied/hr maximum, 35,172 gal coating applied/yr maximum, 33 % solids by volume, 11,606.61 gallons solids applied/yr, 2.1 lb VOC/gal-H ₂ O, 2.9 lb VOC/gal solids, coating density 8.75 lb/gal
Bottom varnish:	0.38 gal coating applied/hr maximum, 1,701 gal coating applied /yr maximum, 45.4% solids by volume, 772.38 gallons solids applied/yr, 2.1 lb VOC/gal-H ₂ O, 2.9 lb VOC/gal solids
Inks:	0.67 gal coating applied/hr maximum, 2,968 gallons applied/yr, 12.96 lb/gal, maximum weight % VOC in the ink is 20%
Clean-up solvent:	annual average, 345 gal applied/yr, 6.55 lb VOC/gal

(Note: while a small amount of emissions from clean-up solvents may be associated with the inside spray operation, all emissions are tracked as if they were emitted only from this source.)

Hourly emissions: 8.05 gal coating applied/hr(0.33 gal solids/gal coating)(2.9 lb VOC/ gal solids) + 0.38 gal coating/hr(0.454 gal solids/gal coating)(2.9 lb VOC/gal solids) + 0.67 gal applied/hr(12.96 lb/gal)(0.2 lb VOC/lb coating) = 9.94 lb VOC/hr (clean-up materials are not included in this "worst case" calculation)

Potential Annual Emissions: 9.94 lb VOC/hr(8760 hrs/hr) / (2000 lbs/ton) = 43.54 tons VOC/yr

Restricted Annual Emissions: [(11,606.61 gal solids coating applied/yr)(2.9 lb VOC/ gal solids) + (772.38 gal solids coating applied /yr)(2.9 lb VOC/gal solids) + 2,968 gallons applied/yr(12.96 lb/gal)(0.2 lb VOC/lb coating) + 345 gal applied/yr(6.55 lb VOC/gal)]/2000 lb/ton = 22.93 ton VOC/yr

b. **Pin oven emissions:**

Tons per Year VOC emission limit calculations:

The continuous motion printer pin oven emissions were based on the maximum fuel usage rating of 2.75 mmBtu/hr as provided by Rexam:

CO	$(84 \text{ lb/mmscf}) \times (2.75 \text{ mmBtu/hr}) / (1020 \text{ mmBtu/mmscf}) = 0.22 \text{ lb/hr} = 0.96 \text{ TPY}$
NOx	$100 \times 2.75/1020 = 0.26 \text{ lb/hr} = 1.15 \text{ ton/yr}$
PE	$1.9 \times 2.75/1020 = 0.01 \text{ lb/hr} = 0.05 \text{ ton/yr}$
PM10	$7.6 \times 2.75/1020 = 0.02 \text{ lb/hr} = 0.09 \text{ ton/yr}$
SO2	$0.6 \times 2.75/1020 = 0.01 \text{ lb/hr} = 0.05 \text{ ton/yr}$
VOC	$5.5 \times 2.75/1020 = 0.02 \text{ lb/hr} = 0.09 \text{ ton/yr}$

Total allowable VOC emissions for continuous motion coater (2.a) and pin oven (2.b) are:

$9.94 \text{ lb/hr} + 0.02 \text{ lb/hr} = 9.96 \text{ lb/hr}$
 $22.93 \text{ tons/yr} + 0.09 \text{ ton/yr} = 23.02 \text{ tons/yr}$

3. Inside spray coating with inside bake oven emissions

a. **Inside spray coating emissions**

Tons per Year VOC emission limit calculations:

The following inside spray data was provided by Rexam:

Coating density: 8.43 lb/gal
24.50 gal coating/hr maximum
102,445 gal coating/yr maximum
19,259.66 gal solids/yr
18.8% solids by volume

Solids content: 21.6% by weight
 Particulate emission factor: 0.006 lb/lb (94% transfer efficiency with 90% efficient collection by sleeves)
 VOC content: 4.9 lb/gal solids, 2.9 lb/gallon excluding water and exempt solvents

Hourly emissions: PE/PM10 = 24.50 gal/hr (8.43 lb coating/gal)(0.216 lb PM/lb coating)(1-0.94)(1-0.90) = 0.27 lb/hr
 VOC = 24.50 gal coating/hr(0.188 gal solids/gal coating)(4.9 lb VOC/gal solids) = 22.57 lb/hr

Potential Annual Emissions: PE/PM10 = .27 lb/hr (8760/2000) = 1.18 tons/yr
 VOC = 22.57 lb/hr (8760/2000) = 98.85 tons/yr

Restricted Annual Emissions: PE/PM10 = [102,445 gal coating/yr (8.43 lb coating/gal)(0.216 lb PM/lb coating)(1-0.94)(1-0.90)] / 2000 lb/ton = 0.56 ton/yr
 VOC = [(19,259.66 gal solids coating/yr)(4.9 lb VOC/gal solids)] / 2000 lb/ton = 47.19 tons/yr

b. Inside bake oven emissions:

Tons per Year VOC emission limit calculations:

The continuous motion printer pin oven emissions were based on the maximum fuel usage rating of 3.55 mmBtu/hr as provided by Rexam:

CO 84 lb/mmBtu(3.55 mmBtu/hr) / (1020 mmBtu/mmBtu) = 0.28 lb/hr = 1.24 TPY
 NOx 100 x 3.55/1020 = 0.34 lb/hr = 1.48 ton/yr
 PE 1.9 x 3.55/1020 = 0.01 lb/hr = 0.05 ton/yr
 PM10 7.6 x 3.55/1020 = 0.03 lb/hr = 0.13 ton/yr
 SO2 0.6 x 3.55/1020 = 0.01 lb/hr = 0.05 ton/yr
 VOC 5.5 x 3.55/1020 = 0.02 lb/hr = 0.09 ton/yr

Total VOC & PE for spray coating & Inside Bake Oven

PE = 0.27 + 0.01 = 0.28 lb/hr
 PE = 0.56 + 0.05 = 0.61 ton/yr
 PM₁₀ = 0.27 + 0.03 = 0.30 lb/hr
 PM₁₀ = 0.56 + 0.13 = 0.69 ton/yr
 VOC = 22.57 + 0.02 = 22.59 lb/hr
 VOC = 47.19 + 0.09 = 47.28 ton/yr

4. K010 total emissions

CO	0.25 + 0.22 + 0.28 = 0.75 lb/hr	1.10 + 0.96 + 1.24 = 3.30 tons/yr
NOx	0.30 + 0.26 + 0.34 = 0.90 lb/hr	1.32 + 1.15 + 1.48 = 3.95 tons/yr
PE	0.01 + 0.01 + 0.28 = 0.30 lb/hr	0.05 + 0.05 + 0.61 = 0.71 tons/yr
PM10	0.03 + 0.02 + 0.30 = 0.35 lb/hr	0.13 + 0.09 + 0.69 = 0.91 tons/yr
SO2	0.01 + 0.01 + 0.01 = 0.03 lb/hr	0.05 + 0.05 + 0.05 = 0.15 tons/yr
VOC	6.13 + 9.96 + 22.59 = 38.68 lb/hr	4.8 + 23.02 + 47.28 = 75.10 tons/yr

5. The allowable emissions (future potential emissions) from K010 (Line 2) are 75.10 tons/yr VOC. Past actual emissions for K010 are 70.02 tons/yr (1996 & 1997 average emissions - this time period was selected because the facility instituted a continuing

program by using lower VOC content coatings and wanted to take a credit for this). Within the last 5 year period, the following emission changes occurred:

2004-2005: The contemporaneous modifications to K011 (line 3 modification to produce 24-ounce beverage cans) created a 34.81 tons per year increase in emissions in VOC.

There is a 5.08 tons year VOC net emission increase associated with Phase I of this proposed modification. Under Phase II, the installation of the new regenerative thermal oxidizer will not increase emissions on line 2 after the full production of 578 million beverage cans is in production.

Summary of PTI 04-01439 Project Emissions						
Emissions Unit	NOx	SO2	PM10	CO	VOC	H2SO4
New/Modified Sources on Line 2 (K010)						
cont. motion coater and coater oven (former K006 unmodified)	1.32	0.05	0.13	1.10	4.80	-
cont. motion printer and deco oven (former K005 modified)	1.15	0.05	0.09	0.96	23.02	-
int. body coater and oven (former K004 modified)	1.48	0.05	0.67	1.24	47.27	-
Total	3.95	0.15	0.89	3.30	75.10 - 70.02 = 5.08. The net increase for K010 is 34.81 tons + 5.08 tons = 39.89 tons	-
PSD/NANSR Significance Levels	40	40	15	100	40	7
Above Significance Levels	NO	NO	NO	NO	NO	NO
The net emission increase for all pollutants is less than significant for all pollutants.						

D. Conclusion

The net contemporaneous emission increase is 39.89 tons/yr VOC, and does not result in a significant increase of VOC emissions.



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
LUCAS COUNTY
Application No: 04-01439
Fac ID: 0448002007**

CERTIFIED MAIL

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

DATE: 5/2/2006

Rexam Beverage Can Company
Geoffrey Wortley
8770 West Bryn Mawr Ave Suite 175
Chicago, IL 606313655

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 or 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

LUCAS COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 04-01439 FOR AN AIR CONTAMINANT SOURCE FOR
Rexam Beverage Can Company**

On 5/2/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Rexam Beverage Can Company**, located at **10444 Waterville Swanton Road, Whitehouse, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01439:

K009 - Line 2/beverage can coating line modification to coat 8-ounce, 12-ounce, and 24-ounce beverage cans.

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.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43602
[(419)936-3015]



DRAFT PERMIT TO INSTALL 04-01439

Application Number: 04-01439
Facility ID: 0448002007
Permit Fee: **To be entered upon final issuance**
Name of Facility: Rexam Beverage Can Company
Person to Contact: Geoffrey Wortley
Address: 8770 West Bryn Mawr Ave Suite 175
Chicago, IL 606313655

Location of proposed air contaminant source(s) [emissions unit(s)]:
**10444 Waterville Swanton Road
Whitehouse, Ohio**

Description of proposed emissions unit(s):
K009 - Line 2/beverage can coating line modification to coat 8-ounce, 12-ounce, and 24-ounce beverage cans.

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. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

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

7. 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

Rexam Beverage Can Company

PTI Application: 04-01439

Issued: To be entered upon final issuance

Facility ID: 0448002007

permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The

reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	3.30
NOx	3.95
PE	0.71
PM10	0.91
SO2	0.15
VOC	75.10 (5.08 increase)

Rexam Beverage Can Company

Facility ID: 0448002007

PTI Application: 04-01439

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. 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 <u>Equipment</u>	<u>Applicable Rules/Requirements</u>	Applicable Emissions Limitations/ <u>Control Measures</u>
K010 - Line 2 - beverage can coating line with the continuous motion printer and oven and interior body sprayer and oven modified to allow for the coating of 8-ounce, 12-ounce, and 24-ounce cans and a continuous motion coater and oven (physically unmodified for 8-ounce and 12-ounce base coating process).	OAC rule 3745-31-02(A)(2)	See Section A.I.2.a.
	OAC rule 3745-31-05(C)	75.10 tons per rolling, 12-month period of volatile organic compound (VOC) emissions.
	OAC rule 3745-31-05(A)(3)	38.68 pounds per hour of VOC emissions.
Unmodified 2-piece beverage can continuous motion base coat coater for 8-ounce and 12-ounce base coating process	OAC rule 3745-31-05(A)(3) (PTI 04-01429 issued 11/29/2005)	See Sections A.I.2.b. and A.I.2.i. for basecoat coating.
	40 CFR Part 60, Subpart WW	See Sections A.I.2.d and A.I.2.f.
	OAC rule 3745-21-09(D)(1)(a)	See Section A.I.2.d.
3.0 mmBtu direct fired natural gas continuous motion basecoater pin oven with no controls.	OAC rule 3745-31-05(A)(3)	0.25 pound per hour and 1.10 tons per year carbon monoxide (CO) emissions;

		0.30 pound per hour and 1.32 tons per year nitrogen oxides (NOx) emissions;
		0.01 pound per hour and 0.05 ton per year of particulate emissions (PE);
		0.03 pound per hour and 0.13 ton per year of PM10; and
		0.01 pound per hour and 0.05 ton per year sulfur dioxide (SO2) emissions.
	OAC rule 3745-17-07(A)(1)	0.02 pound per hour and 0.09 ton VOC per rolling, 12-month period from the combustion of natural gas (see Sections A.I.2.c. and A.I.2.j.)
	OAC rule 3745-17-10(B)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-18-06(A)	0.020 lb PE/mmBtu
	OAC rule 3745-21-08(B)	See Section A.I.2.e.
	OAC rule 3745-23-06(B)	See Section A.I.2.g.
Continuous motion printer, line 2 deco, overvarnish & bottom varnish for 8-ounce, 12-ounce, and 24-ounce beverage can printing operation.	OAC rule 3745-31-05(A)(3)	See Section A.I.2.h.
	40 CFR Part 60, Subpart WW	See Sections A.I.2.b. and A.I.2.i. for overvarnish, exterior bottom end varnish, inks, and clean-up solvent.
	OAC rule 3745-21-09(D)(1)(b), (1)(d)	See Sections A.I.2.d and A.I.2.f.
Continuous motion printer oven modified for 8-	OAC rule 3745-31-05(A)(3)	See Section A.I.2.d.

ounce, 12-ounce, and 24-ounce beverage can printing curing operation.

0.22 pound per hour and 0.96 tons per year CO emissions;

0.26 pound per hour and 1.15 tons per year NOx emissions;

0.01 pound per hour and 0.05 ton per year of PE;

0.02 pound per hour and 0.09 ton per year of PM10; and

OAC rule 3745-17-07(A)(1)

0.01 pound per hour and 0.05 ton per year SO2 emissions.

OAC rule 3745-17-10(B)(1)

0.02 pound per hour and 0.09 ton VOC per rolling, 12-month period from the combustion of natural gas (see Sections A.I.2.c and A.I.2.j.)

OAC rule 3745-18-06(A)

20% opacity as a six-minute average, except as provided by rule

OAC rule 3745-21-08(B)

0.020 lb/mmBtu of particulate matter

OAC rule 3745-23-06(B)

See Section A.I.2.e.

OAC rule 3745-31-05(A)(3)

See Section A.I.2.g.

40 CFR Part 60, Subpart WW

See Section A.I.2.h.

Interior Body Coating line, line 2 can body sprayers for 8-ounce, 12-ounce, and 24-ounce beverage can coating operation.

OAC rule 3745-21-09(D)(1)(c)

See Sections A.I.2.b. and A.I.2.i. for inside spray.

OAC rule 3745-17-07(A)(1)

See Sections A.I.2.d and A.I.2.f.

OAC rule 3745-17-11

See Section A.I.2.d.

Interior body coating line oven modified for 8-ounce, 12-ounce, and 24-ounce beverage can coating curing operation.	OAC rule 3745-31-05(A)(3)	20% opacity as a six-minute average, except as provided by rule
		0.27 pound per hour and 1.18 tons per year of particulate emissions (PE);
		0.28 pound per hour and 1.24 tons per year CO emissions;
		0.34 pound per hour and 1.48 tons per year NOx emissions;
		0.01 pound per hour and 0.05 ton per year of PE;
		0.03 pound per hour and 0.13 ton per year of PM10; and
		0.01 pound per hour and 0.05 ton per year SO2 emissions.
	OAC rule 3745-17-07(A)(1)	0.02 pound per hour and 0.09 ton VOC per rolling, 12-month period from the combustion of natural gas (see Sections A.I.2.c and A.I.2.j.)
	OAC rule 3745-17-10(B)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-18-06(A)	0.020 lb PE/mmBtu
	OAC rule 3745-21-08(B)	See Section A.I.2.e.
	OAC rule 3745-23-06(B)	See Section A.I.2.g.
		See Section A.I.2.h.

2. Additional Terms and Conditions

Rexam Beverage Can Company

PTI Application: 04-01439

Issued: To be entered upon final issuance

Facility ID: 0448002007

Emissions Unit ID: K010

- 2.a** The emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart WW.
- 2.c** The hourly and annual emission limitations were established for PTI purposes to reflect the potential to emit for the combustion of natural gas in these emissions units at the maximum burner capacity of 3.0 mmBtu per hour for the continuous motion basecoat pin oven, 2.75 mmBtu per hour for the continuous motion printer oven, and 3.55 mmBtu per hour for the inside bake oven. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with these limitations.
- 2.d** The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- 2.e** OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- 2.f** This emissions unit is subject to the applicable provisions of Subpart WW of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.g** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the

requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.h** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.i** Volatile organic compound (VOC) emissions from individual coatings shall not exceed the following:

inks:	2.59 pounds per gallon of coating excluding water and exempt solvents;
basecoat coating:	1.8 pounds per gallon of coating excluding water and exempt solvents;
basecoat coating:	2.40 pounds per gallon of coating solids;
over varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
over varnish:	2.9 pounds per gallon of coating solids;
exterior bottom end varnish:	2.1 pounds per gallon of coating excluding water and exempt solvents;
exterior bottom end varnish:	2.9 pounds per gallon of coating solids;
inside spray:	2.9 pounds per gallon of coating excluding water and exempt solvents;
inside spray:	4.9 pounds per gallon of coating solids; and
clean-up solvent:	6.55 pounds of VOC per gallon.

- 2.j** The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 and OAC rule 3745-17-10.

II. Operational Restrictions

- The permittee shall burn only natural gas in the 3.0 mmBtu direct fired natural gas continuous motion basecoater pin oven, 2.75 mmBtu per hour for the continuous motion printer oven, and 3.55 mmBtu for the interior body coating oven (all ovens with no controls) emissions units.

2. The individual HAP and total HAP, combined, emission rates for all emissions units at the facility shall not exceed 9.9 and 24.9 tons per year, respectively, based upon a rolling, 12-month summation of emission rates. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, actual emissions calculated from material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions from this emissions unit and the facility.
3. Coating and clean-up material usage shall not exceed the following levels based upon a rolling, 12-month summation of the usage rates:

Base coat: 3,925 gallons of solids;
 Over varnish: 11,607 gallons of solids;
 Bottom varnish: 772 gallons of solids;
 Inside spray: 19,260 gallons of solids;
 Inks: 2,968 gallons; and
 Clean-up solvent: 345 gallons per rolling 12-month period.

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

Maximum Allowable Cumulative Gallons

Month	Base Coat Gallons	Over Varnish gallons	Bottom Varnish gallons	Inside gallons	Sprays Inks gallons	Clean-Up Solvent gallons
1	340	1,021	68	1,650	254	30
1-2	680	2,041	137	3,300	508	60
1-3	1,020	3,062	205	4,950	762	90
1-4	1,360	4,083	273	6,600	1,016	120
1-5	1,700	5,103	341	8,250	1,270	150
1-6	2,040	6,124	409	9,900	1,524	180
1-7	2,380	7,145	477	11,550	1,778	210
1-8	2,720	8,165	545	13,200	2,032	240
1-9	3,060	9,186	613	14,850	2,286	270
1-10	3,400	10,207	681	16,500	2,540	300
1-11	3,740	11,227	749	18,150	2,794	330
1-12	3,925	11,607	772	19,260	2,968	345

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the usage rates.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas in the basecoater pin oven, printer oven, or the interior body coating oven, the permittee shall maintain a record of the type and quantity of fuel burned in the respective oven.
2. The permittee shall collect and record the following information each month for the line:
 - a.
 - i. the name and identification number of each coating (i.e., over varnish, bottom varnish, inside spray coating, or basecoat coating), as applied,
 - ii. the volume of solids of each coating, in gallons,
 - iii. the VOC content of each coating, in pounds of VOC per gallon of coating excluding water and exempt solvents,
 - iv. the VOC content of each coating, in pounds of VOC per gallon of solids, as applied,
 - v. the monthly total VOC emissions from all coatings employed, $(ii) \times (iv) \div 2000$, in tons;
 - b.
 - i. the name and identification number of each ink, as applied,
 - ii. the volume (or mass) of each ink, in gallons (or pounds),
 - iii. the VOC content of each ink, in pounds of VOC per gallon (or pounds) of ink,
 - iv. the VOC content of each ink, in pounds of VOC per gallon of ink excluding water and exempt solvents,
 - v. the monthly total VOC emissions from all inks employed, calculated on a volume (or mass) basis, $(ii) \times (iii) \div 2000$, in tons;
 - c.
 - i. the name and identification number of each clean-up material employed,
 - ii. the volume of each clean-up material employed, in gallons,
 - iii. the VOC content of each clean-up material employed, in pounds of VOC per gallon,
 - iv. the monthly total VOC emissions from all clean-up materials employed, $(ii) \times (iii) \div 2000$, in tons;
 - d. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of VOC emissions from all coatings, inks and clean-up materials employed, in tons.
 - e. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation, of each type of coating employed in gallons of solids. Also, during the first 12 calendar months of operation following

issuance of this permit, the permittee shall record the cumulative coating usage rates for each calendar month.

- f. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation, of each type of ink employed in gallons (or pounds). Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative ink usage rates for each calendar month.
 - g. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation, of each type of clean-up solvent employed, in gallons. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative clean-up solvent usage rates for each calendar month.
3. The permittee shall submit quarterly written reports that summarize the deviations reported for (a) each day when a fuel other than natural gas was burned in any oven comprising this emissions unit and (b) the use of noncompliant coatings. If no deviations (excursions) have occurred, the permittee shall submit a quarterly report which states that no deviations (excursions) have occurred during the previous quarter. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to the Toledo Division of Environmental Services and shall address the data obtained during the previous calendar period.
 4. The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures, and assumptions supporting the calculations.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in any oven comprising this emission unit, as fuel. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (Toledo Division of Environmental Services) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage rate limitations for coatings specified under A.II.2. These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.1.

4. The permittee shall notify in writing the Toledo Division of Environmental Services within 30 days of becoming aware of an exceedance of either of the limits specified under A.I.2.a.

V. Testing Requirements

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

- a. Emission Limitation:

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

Applicable Compliance Method:

The monitoring and recordkeeping requirement A.III.3 will be used to demonstrate compliance.

- b. Emission Limitation:

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

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated as the summation of the VOC emissions for the combustion of natural gas and the VOC emissions from all coatings and clean-up materials. Compliance with this emission limitation will be demonstrated by the monitoring and recordkeeping requirements of Section III.3.

- c. Emission Limitation:

38.68 pounds per hour of VOC for Line 2.

Applicable Compliance Method:

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

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

Sum of (Gallons of coating applied per hour*volume % of solids*VOC content of Solids) + sum of [(fuel usage rating*84 lb/mmscf)/1020 mmBtu/mmscf]

d. Emission limitation:

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

Applicable Compliance Method:

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

e. Emission limitation:

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

Applicable Compliance Method:

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

f. Emission Limitation:

0.25 pound per hour CO emissions from the continuous motion basecoater pin oven.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

g. Emission Limitation:

1.10 tons per year CO emissions from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.25 pound CO per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly CO limit constitutes compliance with the annual CO limit.

h. Emission Limitation:

0.30 pound per hour NO_x emissions from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

i. Emission Limitation:

1.32 tons per year NO_x emissions from the continuous motion basecoater pin oven.

Applicable Compliance Method:

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Emissions Unit ID: K010

Annual allowable emissions are based on the hourly allowable emission rate (0.30 pound NO_x/hr) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly NO_x limit constitutes compliance with the annual NO_x limit.

j. Emission Limitation:

0.01 pound per hour PE from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 1.9 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

k. Emission Limitation:

0.05 ton per year PE from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

l. Emission Limitation:

0.03 pound per hour PM₁₀ from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 7.6 pounds of PM₁₀ per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

m. Emission Limitation:

0.13 ton per year PM₁₀ from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.03 pound per hour PM₁₀) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

n. Emission Limitation:

0.01 pound per hour SO₂ from the continuous motion basecoater pin oven.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 0.6 pound of SO₂ per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 6 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

o. Emission Limitation:

0.05 ton per year SO₂ emissions from the continuous motion basecoater pin oven.

Applicable Compliance Method

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour SO₂) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual SO₂ emission limitation.

p. Emission Limitation:

0.02 pound per hour VOC emissions from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.0 mmBtu/hr) by an emission factor of 5.5 pounds of VOC per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas (0.02 pound per hour) and the emissions from all coatings utilized (9.94 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

q. Emission Limitation:

0.09 ton of VOC per year from the continuous motion basecoater pin oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.02 pound per hour VOC) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual VOC emission limitation.

r. Emission Limitation:

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

Applicable Compliance Method:

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

s. Emission Limitation:

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

Applicable Compliance Method:

The monitoring and recordkeeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation

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

t. Emission limitation:

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

Applicable Compliance Method:

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

u. Emission Limitation:

0.22 pound per hour CO emissions from the continuous motion printer oven.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

v. Emission Limitation:

0.96 ton per year CO emissions from the continuous motion printer oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.22 pound CO per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly CO limit constitutes compliance with the annual CO limit.

w. Emission Limitation:

0.26 pound per hour NO_x emissions from the continuous motion printer oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

x. Emission Limitation:

1.15 tons per year NO_x emissions from the continuous motion printer oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.26 pound NO_x/hr) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly NO_x limit constitutes compliance with the annual NO_x limit.

y. Emission Limitation:

0.01 pound per hour PE from the continuous motion printer oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 1.9 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu

per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

z. Emission Limitation:

0.05 ton per year PE from the continuous motion printer oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

aa. Emission Limitation:

0.02 pound per hour PM₁₀ from the continuous motion printer oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 7.6 pounds of PM₁₀ per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

bb. Emission Limitation:

0.09 ton per year PM₁₀ from the continuous motion printer oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.02 pound per hour PM₁₀) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

cc. Emission Limitation:

0.01 pound per hour SO₂ from the continuous motion printer oven.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 0.6 pound of SO₂ per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 6 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

dd. Emission Limitation:

0.05 ton per year SO₂ emissions from the continuous motion printer oven.

Applicable Compliance Method

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour SO₂) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual SO₂ emission limitation.

ee. Emission Limitation:

0.02 pound per hour VOC emissions from the continuous motion printer oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (2.75 mmBtu/hr) by an emission factor of 5.5 pounds of VOC per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas (0.02 pound per hour) and the emissions from all coatings utilized (9.94 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

ff. Emission Limitation:

0.09 ton of VOC per year from the continuous motion printer oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.02 pound per hour VOC) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual VOC emission limitation.

gg. Emission Limitation:

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

Applicable Compliance Method:

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

hh. Emission Limitation:

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

Applicable Compliance Method:

The monitoring and recordkeeping requirement A.III will be used to demonstrate compliance. If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be based upon approval by the Toledo Division of Environmental Services. If the permittee determines that Method 24 has not been used for a particular coating,

the permittee shall request that the coating supplier perform Method 24 on the coating in question. If the supplier determines that Method 24 cannot be used, the permittee shall so notify the Administrator of the USEPA and pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, will request that the supplier use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

ii. Emission Limitation:

0.27 pound per hour particulate emissions for the Interior Body Coating, line 2 can body sprayers.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

jj. Emission Limitation:

1.18 tons per year particulate emissions for the Interior Body Coating, line 2 can body sprayers.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.27 pound PE per hour) multiplied by 8760 hours per year and divided by 2000

pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual PE emission limitation.

kk. Emission Limitation:

0.28 pound per hour CO emissions from the inside bake oven.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.55 mmBtu/hr) by an emission factor of 84 pounds of CO per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

ll. Emission Limitation:

1.24 tons per year CO emissions from the inside bake oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.28 pound CO per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly CO limit constitutes compliance with the annual CO limit.

mm. Emission Limitation:

0.34 pound per hour NO_x emissions from the inside bake oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.55 mmBtu/hr) by an emission factor of 100 pounds of NO_x per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

nn. Emission Limitation:

1.48 tons per year NO_x emissions from the inside bake oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.34 pound NO_x/hr) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly NO_x limit constitutes compliance with the annual NO_x limit.

oo. Emission Limitation:

0.01 pound per hour PE from the inside bake oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.55 mmBtu/hr) by an emission factor of 1.9 pounds of PE per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

pp. Emission Limitation:

0.05 ton per year PE from the inside bake oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

qq. Emission Limitation:

0.03 pound per hour PM₁₀ from the inside bake oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.55 mmBtu/hr) by an emission factor of 7.6 pounds of PM₁₀ per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

rr. Emission Limitation:

0.13 ton per year PM_{10} from the inside bake oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.03 pound per hour PM_{10}) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly particulate emission limit constitutes compliance with the annual particulate emission limit.

ss. Emission Limitation:

0.01 pound per hour SO_2 from the inside bake oven.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.55 mmBtu/hr) by an emission factor of 0.6 pound of SO_2 per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 6 of 40 CFR part 60, Appendix A. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

tt. Emission Limitation:

0.05 ton per year SO_2 emissions from the inside bake oven.

Applicable Compliance Method

Annual allowable emissions are based on the hourly allowable emission rate (0.01 pound per hour SO_2) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual SO_2 emission limitation.

uu. Emission Limitation:

0.02 pound per hour VOC emissions from the inside bake oven.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum burner capacity (3.55 mmBtu/hr) by an emission factor of 5.5 pounds of VOC per million standard cubic feet of natural gas (mmscft) divided by a heating value of 1020 million Btu per mmscft from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 25 of 40 CFR Part 60, Appendix A. This demonstration shall be based on a summation of the emissions from the combustion of natural gas (0.02 pound per hour) and the emissions from all coatings utilized (22.57 pounds per hour). Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

vv. Emission Limitation:

0.09 ton of VOC per year from the inside bake oven.

Applicable Compliance Method:

Annual allowable emissions are based on the hourly allowable emission rate (0.02 pound per hour VOC) multiplied by 8760 hours per year and divided by 2000 pounds/ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual VOC emission limitation.

VI. Miscellaneous Requirements

The terms and conditions contained in this permit to install for emissions unit K010 shall supercede all requirements for emissions unit K010 contained in Permit to Install 04-01429 (issued 11/29/2005).

B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K010 - Line 2 - beverage can coating line with the continuous motion printer and oven and interior body sprayer and oven modified to allow for the coating of 8-ounce, 12-ounce and 24-ounce cans and a continuous motion coater and oven.		

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

1. Should any coating formulations cause an odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K010 (former emissions units K006 (Continuous Motion Coater, Line 2 Base Coating Line)) was evaluated based on the actual materials and the design parameters of the each 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: glycol ethers

TLV (mg/m³): 19 (5ppm*90.12/24.05)

Maximum Hourly Emission Rate (lbs/hr): 11.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 79.81 µg/m³

2. Physical changes to or changes in the method of operation of the emissions unit(s) after its (their) 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 clean-up 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:”

Rexam Beverage Can Company

PTI Application: 04-01439

Issued: To be entered upon final issuance

Facility ID: 0448002007

Emissions Unit ID: K010

- 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None