

# Statement of Basis For Title V Permit

Part I - General	
Company Name	Crown, Cork & Seal
Premise Number	0448010466
What makes this facility a Title V facility?	VOC
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Y
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	B004, 04-0348 CFR Part 63 Subpart DDDDD, Terms and Conditions added to permit K001, 04-01352 CFR Part 63 Subpart SSSS, Terms and Conditions added to permit K003, Complete loss in fire, removed from operating permit K004, 04-01059 CFR Part 63, Subpart SSSS, Terms and Conditions added to permit K005, 04-01277, Coating line installed to replace K003, CFR Part 63 Subpart SSSS Terms and Conditions added to permit

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
n/a			

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)													
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.													
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other										
B004; 16.8 MMBtu gas fired boiler	20 percent opacity, as a 6-minute average, except as provided by rule	17-07(A)(1)		N	Y	Y	N	Y	Y	N	Y	N	OR-Inherently clean fuel requirement
	0.020 lb of particulate matter per mmBtu of heat input	17-10(B)(1)		N	Y	Y	N	Y	Y	N	Y	N	OR-Inherently clean fuel requirement
	SO2 exemption	18-06(A)		N	Y	Y	N	Y	Y	N	Y	N	OR-Inherently clean fuel requirement
	0.02 lb of CO per mmBtu of heat	21-08(B)		N	N	Y	N	Y	Y	N	Y	N	
	0.1 of NOx per mmBtu of heat input	23-06(B)											

	2.9 tons per year of CO 10.3 tons per year of NOx 1.5 tons per year of particulate matter 0.3 grain of sulfur per 100 cubic feet of natural gas 0.00083 lb of SO2 permmBtu heat input 0.1 ton per year of SO2 0.005 lb of VOC per mmBtu of heat input and 0.2 ton per year VOC	31-05(A)(3)											Basis - PTI 04-0348 as issued Sept. 24, 1986
K001; 66 inch coil coating line with incinerator	2.92 lbs of VOC per gallon of solids 50.1 lbs per hour of VOC 100% capture and minimum 90% overall control efficiency	31-05(A)(3)		N	Y	Y	N	Y	Y	N	Y	N	Basis - PTI 04-01065 issued June 25, 1997 OR - Operate a capture and control system for VOC emissions requirements from the PTI
	182.1 tons of VOC per 12-month rolling period	31-05(D)											Basis - PTI 04-1065 as issued June 25, 1997
K004; 36 inch coil coating line with incinerator.	not more than 0.14 kg VOC per liter of coating solids (1.17 lbs VOC per gallon of coating solids) for each calendar month, or 10 percent of the VOC's applied for each calendar month (90 percent emission reduction)	N		N	Y	Y	N	Y	Y	N	Y	N	Basis - NSPS Subpart TT, for coating operation with a direct fired natural gas oven, no particulate emissions are anticipated. OR - Operate a capture & control system for VOC emissions requirement from the NSPS.
	4.0 lbs of VOC per gallon of solids as a daily volume-weighted average.	21-09(E)		N	Y	Y	N	Y	Y	N	Y	N	
	39.0 lbs per hour of VOC 170.9 tons per year of VOC 0.42 lb per hour of CO 1.8 tons per year of CO 2.0 lbs per hour NOX 8.8 tons per year of NOx 0.09 lb per hour of particulate 0.40 tons per year of particulate 0.01 lb per hour of SO2 0.05 ton per year of SO2	31-05(A)(3)		N	Y	Y	N	Y	Y	N	Y	N	Basis - PTI 04-1065 issued June 25, 1997 OR - Coating restrictions in order to meet short and long term VOC limits

K005: 36 inch coil coating line with incinerator	14.02 lbs per hour of VOC 61.5 tons per year of VOC 9.7 lbs per hour of CO 11.6 tons per year CO 0.05 lb per hour of particulate 0.22 ton per year particulate 0.02 lb per hour SO2 0.09 ton per year SO2 11.6 ton per year of NOx	31-05(A)(3)		N	Y	Y	N	Y	Y	N	Y	N	Basis PTI 04-01277 issued February 26, 2002 OR-operate a capture and control system

EU = emissions unit ID  
 ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)  
 OR = operational restriction  
 M = monitoring requirements  
 St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement  
 ENF = did noncompliance issues drive the monitoring requirements?  
 R = record keeping requirements  
 Rp = reporting requirements  
 ET = emission testing requirements (not including compliance method terms)  
 Misc = miscellaneous requirements

C **Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.