

Statement of Basis For Title V Permit

Company Name	Crown Cork & Seal Co., Inc. - Toledo		
Premise Number	0448010466		
Number of Non-insignificant Emissions Units	4		
What makes this facility a Title V facility?	VOC		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y		

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

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.

C If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	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)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
	0.020 lb of particulate matter per mmBtus of heat input.	17-10 (B)(1)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
	SO2 exemption	18-06 (A)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
	0.02 lb of CO per mmBtus of heat input.	21-08 (B)		N	Y	Y	Y	Y	N	
	0.1 lb of NOx per mmBtus of heat input.	23-06 (B)		N	Y	Y	Y	Y	N	
	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 per mmBtu of 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 of VOC	31-05 (A)(3)		N	Y	Y	Y	Y	N	Basis - PTI 04-348 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)		Y	Y	Y	Y	Y	N	Basis - PTI 04-1065 as issued June 25, 1997. OR - Operate a capture & control system for VOC emissions requirement from the PTI.
	182.1 tons of VOC per 12-month rolling period	31-05 (D)		N	Y	Y	Y	Y	N	Basis - PTI 04-1065 as issued June 25, 1997.
K003; 36 inch coil coating line with incinerator.	1.12 lbs of VOC per gallon of solids. 16.3 lbs per hour of VOC. 100% capture and minimum 95% overall control efficiency.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	Basis - PTI 04-1065 as issued June 25, 1997. OR - Operate a capture & control system for VOC emissions requirement from the PTI.

incinerator.

	59.5 tons of VOC per 12-month rolling period	31-05 (D)		N	Y	Y	Y	Y	N	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	Y	Y	Y	Y	Y	Y	N	Basis - NSPS Subpart TT, for a roll 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	Y	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 of NOx, 8.8 tons per year of NOx, 0.09 lb per hour of particulate, 0.4 tons per year of particulate, 0.01 lb per hour of SO2, and 0.05 ton per year of SO2.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	Basis - PTI 04-1065 as issued June 25, 1997. OR - Coating restrictions in order to meet short and long term VOC limits.

EU = emissions unit id

OR = operational restriction

M = 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 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. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section.

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 each column where "N" is specified, there should be a brief explanation in the "Comments" section. Also, if a "Y" is noted under "OR" or "Misc," an explanation of the requirements should be provided in the "Comments" section. In addition to a general explanation of the "OR" and/or "Misc," the following should be

provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.