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

03/31/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-72-03-0005
American National Can Company, Fremont, Ohio
Thomas Schaefer
2145 Cedar Street
Fremont, OH 43420

Dear Thomas Schaefer:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northwest District Office
Michigan

Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 03/31/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

American National Can Company, Fremont, Ohio
2145 Cedar Street
Fremont, OH 43420

of a Title V permit for Facility ID: 03-72-03-0005

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:

K001 (Aluminum Can Line 1)
Cans are formed from from aluminum coil, trimmed, cleaned, coated, tested and palatized for beverage can customers.

K002 (Aluminum Can Line 2)
Cans are formed from from aluminum coil, trimmed, cleaned, coated, tested and palatized for beverage can customers.

K003 (Aluminum Can Line 3)
Cans are formed from from aluminum coil, trimmed, cleaned, coated, tested and palatized for beverage can customers.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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 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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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. 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.

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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
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.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> 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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 - 3.2 MMBTU/hr, natural gas fired washer boiler 1
B002 - 3.2 MMBTU/hr, natural gas fired washer boiler 2
B003 - 8.4 MMBTU/hr, natural gas fired plant heater boiler 1
B004 - 8.4 MMBTU/hr, natural gas fired plant heater boiler 2

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Aluminum Can Line 1 (K001)

Activity Description: Cans are formed from from aluminum coil, trimmed, cleaned, coated, tested and palatized for beverage can customers.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (line #1)	OAC rule 3745-21-09 (D)	See A.I.2.a.
	40 CFR Part 60 Subpart WW	See A.I.2.b.
	OAC rule 3745-17-07	See A.I.2.c.
	OAC rule 3745-17-11	0.551 pound particulate emissions (PE) per hour

2. Additional Terms and Conditions

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

i. interior body coating (inside spray coating): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents);

ii. overvarnish: 2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents); and

iii. exterior bottom end coating (bottom varnish): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents).

2.b VOC emissions from the individual coatings shall not exceed the following:

i. inside spray coating - 0.89 kilogram of VOC per liter of coating solids (7.43 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average; and

ii. overvarnish - 0.46 kilogram of VOC per liter of coating solids (3.84 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average.

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

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:

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

b. the VOC content of each coating, in pounds of VOC per gallon of coating (excluding water and exempt solvents) and in pounds of VOC per gallon of solids, as applied;

c. the solids content of each coating, in gallons of solids per gallon of coating; and

d. the volume-weighted average of the total mass of VOC per volume of coating solids for all inside spray coatings employed and for all overvarnish coatings employed. (These calculations are not required if all inside spray coatings employed and all overvanish coatings employed have VOC contents equal to or less than the limits specified in 40 CFR Part 60, Subpart WW, section 60.492(c) and no VOC is added to the coatings during the application or distribution process.)

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the VOC content restrictions in section A.I.2.a & b of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:

0.89 kilogram VOC per liter coating solids - inside spray coating
0.46 kilogram VOC per liter coating solids - overvarnish
4.2 pounds VOC/gallon of coating - inside spray coating
2.8 pounds VOC/gallon of coating - overvarnish
4.2 pounds VOC/gallon of coating - bottom varnish

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in section A.III above.

Any determination of VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

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

1.b Emission Limitation:
0.551 lb/hr PE

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

E = particulate emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:
20% opacity, as a six-minute average

Applicable Compliance Method:
Compliance with the visible emission limitiation above shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (line #1)	OAC rule 3745-31-05 PTI 03-9995	See B.I.2.a, b, & c.

2. Additional Terms and Conditions

2.a VOC emissions from the individual coatings shall not exceed the following:

i. coatings:
(a) interior body coating (inside spray): 38.73 pounds VOC per hour
(b) overvarnish: 10.90 pounds VOC per hour
(c) exterior bottom end coating (bottom varnish): 0.73 pound VOC per hour

ii. inks:
(a) 0.20 pound of VOC per pound of ink (monthly-weighted average),
(b) 2.94 pounds of VOC per hour

iii. blanket wash:
(a) 6.55 pounds of VOC per gallon
(b) 0.4 ton VOC per month
(c) 121 gallons of cleanup materials per month

2.b Particulate emissions (PE) from the line shall not exceed the following:

i. 0.313 pound PE per hour from overspray,
ii. 0.025 pound PE per hour from oil mist,
iii. 0.0121 pound PE per hour from pin oven,
iv. 0.0346 pound PE per hour from the IBO, and
v. 5% opacity, as a six-minute average, from spray operations.

2.c The 38.73 lbs/hr (inside spray coating), 10.9 lbs/hr (overvarnish), 0.73 lbs/hr (bottom varnish), and 2.94 lbs/hr (inks) VOC limitations and the 121 gallons of cleanup materials per month are based on the emissions unit's potential to emit. Therefore, no record keeping/monitoring and reporting are required to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol
TLV microgram/cubic meter (ug/m^3): 983,000
Maximum Hourly Emission Rate (lbs/hr): 1.09
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 43.20
MAGLC (ug/m^3): 23,404.8

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the cleanup material usage in this emissions unit in gallons.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall each month record and maintain the following information for this emissions unit :

a. For the inks:

i. the name and identification number of each ink employed;

ii. the pounds of VOC per pound of each ink, as applied, excluding water and exempt solvents; and

iii the monthly-weighted average of pounds of VOC per pound of ink, as applied, excluding water and exempt solvents.

b. For the blanket wash:

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

ii. the mass of VOC per volume of each cleanup material employed (pounds/gallon);

iii. the number of gallons of each cleanup material employed; and

iv. the total VOC emissions from all cleanup materials employed, in tons.

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. 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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the VOC emission limitation of 0.4 ton/month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup materials and inks in this emissions unit (i.e., for VOC content). 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section B.I of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.20 pound VOC per pound ink (monthly-weighted average)
6.55 pounds VOC per galllon - blanket wash

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section B.III above.

Any determination of VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

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

1.b Emission Limitation:
38.73 pounds VOC per hour - interior body coating (inside spray coating)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.c Emission Limitation:
5% opacity

Applicable Compliance Method:
Compliance with the visible emission limitation shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

1.d Emission Limitation:
0.313 lb PE/hr, from overspray

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

E = particulate emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

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

CE = control efficiency of the control equipment

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10).

V. Testing Requirements (continued)

1.e Emission Limitation:
0.025 lb PE/hr, from oil mist

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

E = particulate emissions rate (lbs/hr)

E = number gallons of oil per hour X 0.028 pound PE per gallon*

* This is based on material balance

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

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10).

1.f Emission Limitation:
0.0121 lb PE/hr, from pin oven
0.0346 lb PE/hr, from IBO

Applicable Compliance Method:
If required, compliance with the PE emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10). In the absence of the Ohio EPA requiring such testing, the permittee shall calculate the actual emissions rate utilizing the following equation:

Pin Oven=hourly gas usage (scf/hr) X 12 lbsPE /mmcu.ft (AP-42, Table 1.4-1)

IBO=hourly gas usage (scf/hr) X 12 lbsPE/mmcu.ft (AP-42, Table 1.4-1)

1.g Emission Limitation:
10.90 pounds VOC per hour - overvarnish coating

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.h Emission Limitation:
0.73 pound VOC per hour - exterior bottom end coating (bottom varnish coating)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.i Emission Limitation:
2.94 pounds VOC per hour - inks

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum ink usage (gallons/hr) by the maximum VOC content of all inks.

1.j Emission Limitation:
121 gallons of cleanup material per month

Applicable Compliance Method:
The permittee shall demonstrate compliance with the cleanup usage restriction based on the record keeping in section B.III.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Aluminum Can Line 2 (K002)

Activity Description: Cans are formed from from aluminum coil, trimmed, cleaned, coated, tested and palatized for beverage can customers.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (line #2)	OAC rule 3745-21-09 (D)	See A.I.2.a.
	40 CFR Part 60 Subpart WW	See A.I.2.b.
	OAC rule 3745-17-07	See A.I.2.c.
	OAC rule 3745-17-11	0.551 pound particulate emissions (PE) per hour

2. Additional Terms and Conditions

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

i. interior body coating (inside spray coating): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents);

ii. overvarnish: 2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents); and

iii. exterior bottom end coating (bottom varnish): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents).

2.b VOC emissions from the individual coatings shall not exceed the following:

i. inside spray coating - 0.89 kilogram of VOC per liter of coating solids (7.43 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average; and

ii. overvarnish - 0.46 kilogram of VOC per liter of coating solids (3.84 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average.

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

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:

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

b. the VOC content of each coating, in pounds of VOC per gallon of coating (excluding water and exempt solvents) and in pounds of VOC per gallon of solids, as applied;

c. the solids content of each coating, in gallons of solids per gallon of coating; and

d. the volume-weighted average of the total mass of VOC per volume of coating solids for all inside spray coatings employed and for all overvarnish coatings employed. (These calculations are not required if all inside spray coatings employed and all overvanish coatings employed have VOC contents equal to or less than the limits specified in 40 CFR Part 60, Subpart WW, section 60.492(c) and no VOC is added to the coatings during the application or distribution process.)

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the VOC content restrictions in section A.I.2.a & b of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:

0.89 kilogram VOC per liter coating solids - inside spray coating
0.46 kilogram VOC per liter coating solids - overvarnish
4.2 pounds VOC/gallon of coating - inside spray coating
2.8 pounds VOC/gallon of coating - overvarnish
4.2 pounds VOC/gallon of coating - bottom varnish

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in section A.III above.

Any determination of VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

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

1.b Emission Limitation:
0.551 lb/hr PE

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

E = particulate emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:
20% opacity, as a six-minute average

Applicable Compliance Method:
Compliance with the visible emission limitiation above shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (line #2)	OAC rule 3745-31-05 PTI 03-9995	See B.I.2.a, b, & c.

2. Additional Terms and Conditions

2.a VOC emissions from the individual coatings shall not exceed the following:

i. coatings:
(a) interior body coating (inside spray): 38.73 pounds VOC per hour
(b) overvarnish: 10.90 pounds VOC per hour
(c) exterior bottom end coating (bottom varnish): 0.73 pound VOC per hour

ii. inks:
(a) 0.20 pound of VOC per pound of ink (monthly-weighted average),
(b) 2.94 pounds of VOC per hour

iii. blanket wash:
(a) 6.55 pounds of VOC per gallon
(b) 0.4 ton VOC per month
(c) 121 gallons of cleanup materials per month

2.b Particulate emissions (PE) from the line shall not exceed the following:

i. 0.313 pound PE per hour from overspray,
ii. 0.025 pound PE per hour from oil mist,
iii. 0.0121 pound PE per hour from pin oven,
iv. 0.0346 pound PE per hour from the IBO, and
v. 5% opacity, as a six-minute average, from spray operations.

2.c The 38.73 lbs/hr (inside spray coating), 10.9 lbs/hr (overvarnish), 0.73 lbs/hr (bottom varnish), and 2.94 lbs/hr (inks) VOC limitations and the 121 gallons of cleanup materials per month are based on the emissions unit's potential to emit. Therefore, no record keeping/monitoring and reporting are required to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol
TLV microgram/cubic meter (ug/m^3): 983,000
Maximum Hourly Emission Rate (lbs/hr): 1.09
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 43.20
MAGLC (ug/m^3): 23,404.8

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the cleanup material usage in this emissions unit in gallons.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall each month record and maintain the following information for this emissions unit :

a. For the inks:

i. the name and identification number of each ink employed;

ii. the pounds of VOC per pound of each ink, as applied, excluding water and exempt solvents; and

iii the monthly-weighted average of pounds of VOC per pound of ink, as applied, excluding water and exempt solvents.

b. For the blanket wash:

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

ii. the mass of VOC per volume of each cleanup material employed (pounds/gallon);

iii. the number of gallons of each cleanup material employed; and

iv. the total VOC emissions from all cleanup materials employed, in tons.

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. 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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the VOC emission limitation of 0.4 ton/month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup materials and inks in this emissions unit (i.e., for VOC content). 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section B.I of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.20 pound VOC per pound ink (monthly-weighted average)
6.55 pounds VOC per galllon - blanket wash

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section B.III above.

Any determination of VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

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

1.b Emission Limitation:
38.73 pounds VOC per hour - interior body coating (inside spray coating)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.c Emission Limitation:
5% opacity

Applicable Compliance Method:
Compliance with the visible emission limitation shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

1.d Emission Limitation:
0.313 lb PE/hr, from overspray

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

E = particulate emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

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

CE = control efficiency of the control equipment

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10).

V. Testing Requirements (continued)

1.e Emission Limitation:
0.025 lb PE/hr, from oil mist

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

E = particulate emissions rate (lbs/hr)

E = number gallons of oil per hour X 0.028 pound PE per gallon*

* This is based on material balance

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

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10).

1.f Emission Limitation:
0.0121 lb PE/hr, from pin oven
0.0346 lb PE/hr, from IBO

Applicable Compliance Method:
If required, compliance with the PE emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10). In the absence of the Ohio EPA requiring such testing, the permittee shall calculate the actual emissions rate utilizing the following equation:

Pin Oven=hourly gas usage (scf/hr) X 12 lbsPE /mmcu.ft (AP-42, Table 1.4-1)

IBO=hourly gas usage (scf/hr) X 12 lbsPE/mmcu.ft (AP-42, Table 1.4-1)

1.g Emission Limitation:
10.90 pounds VOC per hour - overvarnish coating

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.h Emission Limitation:
0.73 pound VOC per hour - exterior bottom end coating (bottom varnish coating)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.i Emission Limitation:
2.94 pounds VOC per hour - inks

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum ink usage (gallons/hr) by the maximum VOC content of all inks.

1.j Emission Limitation:
121 gallons of cleanup material per month

Applicable Compliance Method:
The permittee shall demonstrate compliance with the cleanup usage restriction based on the record keeping in section B.III.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Aluminum Can Line 3 (K003)

Activity Description: Cans are formed from from aluminum coil, trimmed, cleaned, coated, tested and palatized for beverage can customers.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (line #3)	OAC rule 3745-21-09 (D)	See A.I.2.a.
	40 CFR Part 60 Subpart WW	See A.I.2.b.
	OAC rule 3745-17-07	See A.I.2.c.
	OAC rule 3745-17-11	0.551 pound particulate emissions (PE) per hour

2. Additional Terms and Conditions

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

i. interior body coating (inside spray coating): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents);

ii. overvarnish: 2.8 pounds of VOC per gallon of coating (excluding water and exempt solvents); and

iii. exterior bottom end coating (bottom varnish): 4.2 pounds of VOC per gallon of coating (excluding water and exempt solvents).

2.b VOC emissions from the individual coatings shall not exceed the following:

i. inside spray coating - 0.89 kilogram of VOC per liter of coating solids (7.43 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average; and

ii. overvarnish - 0.46 kilogram of VOC per liter of coating solids (3.84 pounds of VOC per gallon coating solids) based on a volume-weighted calendar-month average.

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

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:

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

b. the VOC content of each coating, in pounds of VOC per gallon of coating (excluding water and exempt solvents) and in pounds of VOC per gallon of solids, as applied;

c. the solids content of each coating, in gallons of solids per gallon of coating; and

d. the volume-weighted average of the total mass of VOC per volume of coating solids for all inside spray coatings employed and for all overvarnish coatings employed. (These calculations are not required if all inside spray coatings employed and all overvanish coatings employed have VOC contents equal to or less than the limits specified in 40 CFR Part 60, Subpart WW, section 60.492(c) and no VOC is added to the coatings during the application or distribution process.)

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the VOC content restrictions in section A.I.2.a & b of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:

0.89 kilogram VOC per liter coating solids - inside spray coating
0.46 kilogram VOC per liter coating solids - overvarnish
4.2 pounds VOC/gallon of coating - inside spray coating
2.8 pounds VOC/gallon of coating - overvarnish
4.2 pounds VOC/gallon of coating - bottom varnish

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in section A.III above.

Any determination of VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

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

1.b Emission Limitation:
0.551 lb/hr PE

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

E = particulate emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:
20% opacity, as a six-minute average

Applicable Compliance Method:
Compliance with the visible emission limitiation above shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
two-piece aluminum beverage can line (line #3)	OAC rule 3745-31-05 PTI 03-9995	See B.I.2.a, b, & c.

2. Additional Terms and Conditions

2.a VOC emissions from the individual coatings shall not exceed the following:

i. coatings:
(a) interior body coating (inside spray): 38.73 pounds VOC per hour
(b) overvarnish: 10.90 pounds VOC per hour
(c) exterior bottom end coating (bottom varnish): 0.73 pound VOC per hour

ii. inks:
(a) 0.20 pound of VOC per pound of ink (monthly-weighted average),
(b) 2.94 pounds of VOC per hour

iii. blanket wash:
(a) 6.55 pounds of VOC per gallon
(b) 0.4 ton VOC per month
(c) 121 gallons of cleanup materials per month

2.b Particulate emissions (PE) from the line shall not exceed the following:

i. 0.313 pound PE per hour from overspray,
ii. 0.025 pound PE per hour from oil mist,
iii. 0.0121 pound PE per hour from pin oven,
iv. 0.0346 pound PE per hour from the IBO, and
v. 5% opacity, as a six-minute average, from spray operations.

2.c The 38.73 lbs/hr (inside spray coating), 10.9 lbs/hr (overvarnish), 0.73 lbs/hr (bottom varnish), and 2.94 lbs/hr (inks) VOC limitations and the 121 gallons of cleanup materials per month are based on the emissions unit's potential to emit. Therefore, no record keeping/monitoring and reporting are required to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol
TLV microgram/cubic meter (ug/m^3): 983,000
Maximum Hourly Emission Rate (lbs/hr): 1.09
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 43.20
MAGLC (ug/m^3): 23,404.8

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the cleanup material usage in this emissions unit in gallons.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall each month record and maintain the following information for this emissions unit :

a. For the inks:

i. the name and identification number of each ink employed;

ii. the pounds of VOC per pound of each ink, as applied, excluding water and exempt solvents; and

iii the monthly-weighted average of pounds of VOC per pound of ink, as applied, excluding water and exempt solvents.

b. For the blanket wash:

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

ii. the mass of VOC per volume of each cleanup material employed (pounds/gallon);

iii. the number of gallons of each cleanup material employed; and

iv. the total VOC emissions from all cleanup materials employed, in tons.

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. 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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the VOC emission limitation of 0.4 ton/month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying cleanup materials and inks in this emissions unit (i.e., for VOC content). 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section B.I of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.20 pound VOC per pound ink (monthly-weighted average)
6.55 pounds VOC per galllon - blanket wash

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section B.III above.

Any determination of VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The company shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the company, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

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

1.b Emission Limitation:
38.73 pounds VOC per hour - interior body coating (inside spray coating)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.c Emission Limitation:
5% opacity

Applicable Compliance Method:
Compliance with the visible emission limitation shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

1.d Emission Limitation:
0.313 lb PE/hr, from overspray

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

E = particulate emissions rate (lbs/hr)

E = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

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

CE = control efficiency of the control equipment

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10).

V. Testing Requirements (continued)

1.e Emission Limitation:
0.025 lb PE/hr, from oil mist

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

E = particulate emissions rate (lbs/hr)

E = number gallons of oil per hour X 0.028 pound PE per gallon*

* This is based on material balance

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

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10).

1.f Emission Limitation:
0.0121 lb PE/hr, from pin oven
0.0346 lb PE/hr, from IBO

Applicable Compliance Method:
If required, compliance with the PE emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03-(B)(10). In the absence of the Ohio EPA requiring such testing, the permittee shall calculate the actual emissions rate utilizing the following equation:

Pin Oven=hourly gas usage (scf/hr) X 12 lbsPE /mmcu.ft (AP-42, Table 1.4-1)

IBO=hourly gas usage (scf/hr) X 12 lbsPE/mmcu.ft (AP-42, Table 1.4-1)

1.g Emission Limitation:
10.90 pounds VOC per hour - overvarnish coating

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.h Emission Limitation:
0.73 pound VOC per hour - exterior bottom end coating (bottom varnish coating)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all coatings.

1.i Emission Limitation:
2.94 pounds VOC per hour - inks

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum ink usage (gallons/hr) by the maximum VOC content of all inks.

1.j Emission Limitation:
121 gallons of cleanup material per month

Applicable Compliance Method:
The permittee shall demonstrate compliance with the cleanup usage restriction based on the record keeping in section B.III.

VI. Miscellaneous Requirements

None

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