



State of Ohio Environmental Protection Agency

Street Address:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

Mailing Address:

P.O. Box 1049
Columbus, OH 43216-1049

12/05/96

CERTIFIED MAIL

08-19-07-0068
Van Leer Containers
Mary Lynn Hall
4300 West 130th Street
Chicago, IL 60658

RE: Draft Title V Chapter 3745-77 permit

Dear Mary Lynn Hall:

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 RAPCA 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 about this draft Title V permit, please contact RAPCA.

Very truly yours,

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

cc: USEPA
RAPCA
Indiana



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 12/05/96

DRAFT

Facility ID: 08-19-07-0068

This document constitutes issuance to:

Van Leer Containers
526 Markwith Ave.
Greenville, OH 45331

of a Title V permit for:

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

K001 (Exterior Pail Paint Booth and Oven)
Spray Booth And Drying Oven Used In The Exterior Coating Of Steel Drums

K002 (Pail and Parts Lining Booths and Oven)
Interior Shell And Bottom Lining Booth, Parts Lining Booth And Associated Lining Oven

P003 (Pail Parts Rust Inhibitor Booth and Oven)
Pail Lids Are Coated With A Rust Inhibitor Using A Spray Operation, Followed By Drying In An Oven

P004 (Press-Lube Curl Flange)
Pail Shell For Making Curls And Flanges On Shell

P005 (Pail Parts Forming Presses and Flash-off Oven)
Pail Lids Are Formed In 11 Presses To Customer Specifications and then Sent Through a Natural Gas Fired Oven To Remove Residual Lubricant.

You will be contacted approximately 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 (DO or LAA) listed below. This permit and the authorization to emit shall expire at midnight on the expiration date shown above. To receive authorization to have emissions beyond the above date of expiration, the permittee shall submit such information and forms as are required by Ohio EPA no later than 180 days prior to the above date of expiration.

Described below is the current DO or LAA that is responsible for processing and administering your Title V permit:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(513) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

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, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be 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.

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.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements 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 3745-77-07.
- 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 on an annual basis unless the applicable requirement specifies more frequent submissions.
 - 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, 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.

B. State Only Enforceable Section

1. Compliance Requirements

The above-described emissions unit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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.

3. 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.)

4. 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.

5. 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.

6. 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).

7. 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.

8. 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.

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:

Z001 No. 1 Pre-curl compound machine
Z002 No. 2 Pre-curl compound machine
Z003 No. 3 Pre-curl compound machine
Z004 Auto-cleat welder
Z005 Gasket cover machine
Z006 2-person cleat welder
Z007 Off-line sheet grinder
Z008 Seam welder
Z009 Auto ear welder
Z010 Waste filter press
Z011 Cooling tunnel exhausts

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.

2. The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transportation, and disposal of any waste material generated by the operation of the emissions unit.
3. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Exterior Pail Paint Booth and Oven (K001)

Activity Description: Spray Booth And Drying Oven Used In The Exterior Coating Of Steel Drums

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---------------------------------------|---|
| Exterior pail booth and oven, miscellaneous metal parts coating line | 3745-21-09(U)(1)(f) | 3.5 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average; |
| | 3745-17-11 | 1.09 lbs/hr particulate matter |

2. Additional Terms and Conditions

- 2.a The coatings employed in this emissions unit shall comply with the VOC content limitation of 3.5 lbs VOC/gallon of coating excluding water and exempt solvents by a daily volume-weighted average.

II. Operational Restrictions

1. This emissions unit shall employ a water wash exhaust gas filtration system at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - (a) The name and identification number of each coating, as applied.
 - (b) The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - (c) The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

IV. Reporting Requirements

1. The permittee shall notify the Regional Air Pollution Control Agency (RAPCA) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent to the RAPCA within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation -
3.5 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average

Applicable Compliance Method -

USEPA Methods 24A shall be used to determine the VOC contents for flexographic and rotogravure printing inks. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A. In addition, the daily volume-weighted average VOC content shall be calculated in accordance with paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

- 1.b** Emission Limitation:
1.09 lbs particulate matter/hr

Applicable Compliance Method:

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

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
|---|---|--|

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pail and Parts Lining Booths and Oven (K002)

Activity Description: Interior Shell And Bottom Lining Booth, Parts Lining Booth And Associated Lining Oven

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---------------------------------------|---|
| Interior pail booth and oven, miscellaneous metal parts coating line | 3745-21-09(U)(1)(e) | 4.3 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average; |
| | 3745-17-11 | 1.67 lbs/hr particulate matter |

2. Additional Terms and Conditions

- 2.a The coatings employed in this emissions unit shall comply with the VOC content limitation of 4.3 lbs VOC/gallon of coating excluding water and exempt solvents by a daily volume-weighted average.

II. Operational Restrictions

1. This emissions unit shall employ a water wash exhaust gas filtration system at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - (a) The name and identification number of each coating, as applied.
 - (b) The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - (c) The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

IV. Reporting Requirements

1. The permittee shall notify the Regional Air Pollution Control Agency (RAPCA) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent to the RAPCA within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation -
4.3 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average

Applicable Compliance Method -

USEPA Methods 24A shall be used to determine the VOC contents for flexographic and rotogravure printing inks. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A. In addition, the daily volume-weighted average VOC content shall be calculated in accordance with paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

- 1.b** Emission Limitation:
1.67 lb particulate matter/hr

Applicable Compliance Method:

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

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
|---|---|--|

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pail Parts Rust Inhibitor Booth and Oven (P003)

Activity Description: Pail Lids Are Coated With A Rust Inhibitor Using A Spray Operation, Followed By Drying In An Oven

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---------------------------------------|--|
| Pail parts rust inhibitor booth and oven, miscellaneous metal parts coating line | 3745-21-09(U)(2)(e)(ii) | less than or equal to 10 gallons/day coating usage |

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 10 gallons.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - (a) The name and identification number of each coating employed.
 - (b) The volume, in gallons, of each coating employed.
 - (c) The total volume, in gallons, of all of the coatings employed.

IV. Reporting Requirements

1. The permittee shall notify the Regional Air Pollution Control Agency (RAPCA) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. This notification shall include a copy of such record and shall be sent to the RAPCA within 45 days after the exceedance occurs.

V. Testing Requirements

None

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
|---|---|--|

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press-Lube Curl Flange (P004)
Activity Description: Pail Shell For Making Curls And Flanges On Shell

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Press-lube curl flange lubrication | 3745-21-07(G) | use of only non-photochemically reactive materials |

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. Propylene glycol, a non-photochemically reactive material, shall be the only organic compound used in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - (a) The number of gallons of propylene glycol employed.
 - (b) The density (lbs/gal) of propylene glycol.
 - (c) The total organic compound emissions from propylene glycol, i.e., (a) x (b).

IV. Reporting Requirements

None

V. Testing Requirements

None

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--|---|
|--|--|---|

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pail Parts Forming Presses and Flash-off Oven (P005)

Activity Description: Pail Lids Are Formed In 11 Presses To Customer Specifications and then Sent Through a Natural Gas Fired Oven To Remove Residual Lubricant.

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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Eleven (11) pail parts forming presses lubrication and flash-off oven | 3745-21-07 (G)(2) | 8 lbs/hr and 40 lbs/day |

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the lubricating operation:
 - (a) The company identification for the lubricant employed.
 - (b) The number of gallons of lubricant employed.
 - (c) The organic compound content of the lubricant, in pounds per gallon.
 - (d) The organic compound emission rate for the lubricant, in pounds per day.
 - (e) The total number of hours the emissions unit was in operation.
 - (f) The average hourly organic compound emission rate for the lubricant, i.e., (d)/(e), in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information. Such reports shall be submitted to the Regional Air Pollution Control Agency within 30 days after the deviation (excursion) occurs.
 - (a) An identification of each day during which the average hourly organic compound emission rate (from lubricants) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
 - (b) An identification of each day during which the organic compound emission rate (from lubricants) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
8 lbs/hr organic compounds

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in (III)(1).
 - 1.b Emission Limitation -
40 lbs/day organic compounds

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in (III)(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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Eleven (11) pail parts forming presses lubrication and flash-off oven | | 7.3 TPY Organic Compounds |

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Emission Limitation -
7.3 tons/year organic compounds

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in (A) (III)(1) and shall be the sum of the daily organic compound emission rates for the calendar year.

VI. Miscellaneous Requirements

None

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