

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Metal Container Corporation	
Premise Number	0125040914	
Number of Non-insignificant Emissions Units	Five (5)	
What makes this facility a Title V facility?	The potential to emit VOC and HAP compounds exceed Title V Thresholds	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
None.			

- **Instructions for Part II:**

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

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

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K007	2.8 pounds VOC per gallon of basecoating material applied	21-09 (D)(1)(a)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each exterior basecoating material employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant basecoating materials employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of exterior basecoating material. Misc: There are no miscellaneous requirements.
K007	2.8 pounds VOC per gallon of overvarnish coating applied	21-09 (D)(1)(b)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each overvarnish coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant overvarnish coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of overvarnish coatings. Misc: There are no miscellaneous requirements.
K007	4.2 pounds VOC per gallon of interior body coating applied	21-09 (D)(1)(c)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each inside spray coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant inside spray coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of inside spray coatings. Misc: There are no miscellaneous requirements.

K007	4.2 pounds VOC gallon of exterior bottom varnish applied	21-09 (D)(1)(d)		N	N	Y	Y	Y	N	<p>OR: There are no operational restrictions applicable to this emissions limitation.</p> <p>M: There are no monitoring requirements associated with this emissions limitation.</p> <p>R: Record name, identification, and VOC content of each bottom varnish coating employed in this emissions unit.</p> <p>Rp: Submit deviation reports showing use of any noncompliant bottom varnish coatings employed in this emissions unit.</p> <p>ET: USEPA Method 24 shall be used to determine the VOC content of bottom varnish coatings.</p> <p>Misc: There are no miscellaneous requirements.</p>
K007	20% opacity as a 6-minute average	17-07 (A)(1)(a)		N	N	N	N	Y	N	<p>OR: There are no operational restrictions applicable to this emissions limitation.</p> <p>M: There are no monitoring requirements associated with this emissions limitation.</p> <p>R: There are no record keeping requirements associated with this emissions limitation.</p> <p>Rp: There are no reporting requirements associated with this emissions limitation.</p> <p>ET: Compliance shall be demonstrated in accordance with the methods outlined in OAC rule 3745-17-03(B)(1).</p> <p>Misc: There are no miscellaneous requirements.</p>
K007	1.07 pounds PM per hour	17-11 (A)(4)		Y	N	Y	Y	Y	N	<p>OR: Monthly inspection, and service or replacement of equipment used to control particulate emissions.</p> <p>M: There are no monitoring requirements associated with this emissions limitation.</p> <p>R: Maintain daily records of any time period when particulate control equipment is not in service while this emissions unit is operating.</p> <p>Rp: Submit deviation reports when particulate control equipment is not in service while this emissions unit is operating.</p> <p>ET: Compliance shall be demonstrated using the coating mass application rates, coating transfer efficiencies, and the particulate control efficiencies.</p> <p>Misc: There are no miscellaneous requirements.</p>

K007	0.29 kilogram VOC per liter (2.42 lbs/gal) of coating solids for exterior basecoating operation, 0.46 kilogram VOC per liter (3.84 lbs/gal) of coating solids for overvarnish coating application, and 0.89 kilogram VOC per liter (7.43 lbs/gal) of coating solids for inside spray coating application.		40 CFR Part 60, Subpart WW (60.492)	N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record the volume-weighted calendar month average VOC content of all exterior basecoats, overvarnish coatings, and inside spray coatings, as applied. Rp: Submit deviation reports when the volume-weighted calendar month average VOC content of all exterior basecoats, overvarnish coatings, and inside spray coating exceed their respective NSPS limitations. ET: USEPA Method 24 shall be used to determine the VOC content of coatings. Misc: There are no miscellaneous requirements.
K008	2.8 pounds VOC per gallon of overvarnish coating applied	21-09 (D)(1)(b)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each overvarnish coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant overvarnish coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of overvarnish coatings. Misc: There are no miscellaneous requirements.
K008	4.2 pounds VOC per gallon of interior body coating applied	21-09 (D)(1)(c)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each inside spray coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant inside spray coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of inside spray coatings. Misc: There are no miscellaneous requirements.

K008	4.2 pounds VOC gallon of exterior bottom varnish applied	21-09 (D)(1)(d)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each bottom varnish coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant bottom varnish coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of bottom varnish coatings. Misc: There are no miscellaneous requirements.
K008	20% opacity as a 6-minute average	17-07 (A)(1)(a)		N	N	N	N	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: There are no record keeping requirements associated with this emissions limitation. Rp: There are no reporting requirements associated with this emissions limitation. ET: Compliance shall be demonstrated in accordance with the methods outlined in OAC rule 3745-17-03(B)(1). Misc: There are no miscellaneous requirements.
K008	0.78 pound PM per hour	17-11 (A)(4)		Y	N	Y	Y	Y	N	OR: Monthly inspection, and service or replacement of equipment used to control particulate emissions. M: There are no monitoring requirements associated with this emissions limitation. R: Maintain daily records of any time period when particulate control equipment is not in service while this emissions unit is operating. Rp: Submit deviation reports when particulate control equipment is not in service while this emissions unit is operating. ET: Compliance shall be demonstrated using the coating mass application rates, coating transfer efficiencies, and the particulate control efficiencies. Misc: There are no miscellaneous requirements.
K008	0.46 kilogram VOC per liter (3.84 lbs/gal) of coating solids for overvarnish coating application, and 0.89 kilogram VOC per liter (7.43 lbs/gal) of coating solids for inside spray coating application.		40 CFR Part 60, Subpart WW (60.492)	N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record the volume-weighted calendar month average VOC content of all overvarnish coatings, and inside spray coatings, as applied. Rp: Submit deviation reports when the volume-weighted calendar month average VOC content of all overvarnish coatings, and inside spray coating exceed their respective NSPS limitations. ET: USEPA Method 24 shall be used to determine the VOC content of coatings. Misc: There are no miscellaneous requirements.

K009	2.8 pounds VOC per gallon of overvarnish coating applied	21-09 (D)(1)(b)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each overvarnish coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant overvarnish coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of overvarnish coatings. Misc: There are no miscellaneous requirements.
K009	4.2 pounds VOC per gallon of interior body coating applied	21-09 (D)(1)(c)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each inside spray coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant inside spray coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of inside spray coatings. Misc: There are no miscellaneous requirements.
K009	4.2 pounds VOC gallon of exterior bottom varnish applied	21-09 (D)(1)(d)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each bottom varnish coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant bottom varnish coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of bottom varnish coatings. Misc: There are no miscellaneous requirements.
K009	20% opacity as a 6-minute average	17-07 (A)(1)(a)		N	N	N	N	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: There are no record keeping requirements associated with this emissions limitation. Rp: There are no reporting requirements associated with this emissions limitation. ET: Compliance shall be demonstrated in accordance with the methods outlined in OAC rule 3745-17-03(B)(1). Misc: There are no miscellaneous requirements.

K009	0.78 pound PM per hour	17-11 (A)(4)		Y	N	Y	Y	Y	N	OR: Monthly inspection, and service or replacement of equipment used to control particulate emissions. M: There are no monitoring requirements associated with this emissions limitation. R: Maintain daily records of any time period when particulate control equipment is not in service while this emissions unit is operating. Rp: Submit deviation reports when particulate control equipment is not in service while this emissions unit is operating. ET: Compliance shall be demonstrated using the coating mass application rates, coating transfer efficiencies, and the particulate control efficiencies. Misc: There are no miscellaneous requirements.
K009	0.46 kilogram VOC per liter (3.84 lbs/gal) of coating solids for overvarnish coating application, and 0.89 kilogram VOC per liter (7.43 lbs/gal) of coating solids for inside spray coating application.		40 CFR Part 60, Subpart WW (60.492)	N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record the volume-weighted calendar month average VOC content of all overvarnish coatings, and inside spray coatings, as applied. Rp: Submit deviation reports when the volume-weighted calendar month average VOC content of all overvarnish coatings, and inside spray coating exceed their respective NSPS limitations. ET: USEPA Method 24 shall be used to determine the VOC content of coatings. Misc: There are no miscellaneous requirements.
K010	2.8 pounds VOC per gallon of basecoating material applied	21-09 (D)(1)(a)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each exterior basecoating material employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant basecoating materials employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of exterior basecoating material. Misc: There are no miscellaneous requirements.
K010	2.8 pounds VOC per gallon of overvarnish coating applied	21-09 (D)(1)(b)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each overvarnish coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant overvarnish coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of overvarnish coatings. Misc: There are no miscellaneous requirements.

K010	4.2 pounds VOC per gallon of interior body coating applied	21-09 (D)(1)(c)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each inside spray coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant inside spray coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of inside spray coatings. Misc: There are no miscellaneous requirements.
K010	4.2 pounds VOC gallon of exterior bottom varnish applied	21-09 (D)(1)(d)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each bottom varnish coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant bottom varnish coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of bottom varnish coatings. Misc: There are no miscellaneous requirements.
K010	20% opacity as a 6-minute average	17-07 (A)(1)(a)		N	N	N	N	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: There are no record keeping requirements associated with this emissions limitation. Rp: There are no reporting requirements associated with this emissions limitation. ET: Compliance shall be demonstrated in accordance with the methods outlined in OAC rule 3745-17-03(B)(1). Misc: There are no miscellaneous requirements.
K010	1.07 pounds PM per hour	17-11 (A)(4)		Y	N	Y	N	Y	N	OR: Monthly inspection, and service or replacement of equipment used to control particulate emissions. M: There are no monitoring requirements associated with this emissions limitation. R: Maintain daily records of any time period when particulate control equipment is not in service while this emissions unit is operating. Rp: Submit deviation reports when particulate control equipment is not in service while this emissions unit is operating. ET: Compliance shall be demonstrated using the coating mass application rates, coating transfer efficiencies, and the particulate control efficiencies. Misc: There are no miscellaneous requirements.

K010	0.29 kilogram VOC per liter (2.42 lbs/gal) of coating solids for exterior basecoating operation, 0.46 kilogram VOC per liter (3.84 lbs/gal) of coating solids for overvarnish coating application, and 0.89 kilogram VOC per liter (7.43 lbs/gal) of coating solids for inside spray coating application.		40 CFR Part 60, Subpart WW (60.492)	N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record the volume-weighted calendar month average VOC content of all exterior basecoats, overvarnish coatings, and inside spray coatings, as applied. Rp: Submit deviation reports when the volume-weighted calendar month average VOC content of all exterior basecoats, overvarnish coatings, and inside spray coating exceed their respective NSPS limitations. ET: USEPA Method 24 shall be used to determine the VOC content of coatings. Misc: There are no miscellaneous requirements.
K011	4.2 pounds VOC per gallon of interior body coating applied	21-09 (D)(1)(c)		N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each inside spray coating employed in this emissions unit. Rp: Submit deviation reports showing use of any noncompliant inside spray coatings employed in this emissions unit. ET: USEPA Method 24 shall be used to determine the VOC content of inside spray coatings. Misc: There are no miscellaneous requirements.
K011	20% opacity as a 6-minute average	17-07 (A)(1)(a)		N	N	N	N	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: There are no record keeping requirements associated with this emissions limitation. Rp: There are no reporting requirements associated with this emissions limitation. ET: Compliance shall be demonstrated in accordance with the methods outlined in OAC rule 3745-17-03(B)(1). Misc: There are no miscellaneous requirements.

K011	0.27 pound PM per hour	17-11 (A)(4)		Y	N	Y	N	Y	N	OR: Monthly inspection, and service or replacement of equipment used to control particulate emissions. M: There are no monitoring requirements associated with this emissions limitation. R: Maintain daily records of any time period when particulate control equipment is not in service while this emissions unit is operating. Rp: Submit deviation reports when particulate control equipment is not in service not in service while this emissions unit is operating. ET: Compliance shall be demonstrated using the coating mass application rates, coating transfer efficiencies, and the particulate control efficiencies. Misc: There are no miscellaneous requirements.
K011	0.89 kilogram VOC per liter (7.43 lbs/gal) of coating solids for inside spray coating application.		40 CFR Part 60, Subpart WW (60.492)	N	N	Y	Y	Y	N	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record the volume-weighted calendar month average VOC content of all inside spray coatings, as applied. Rp: Submit deviation reports when the volume-weighted calendar month average VOC content of all inside spray coating exceed their respective NSPS limitations. ET: USEPA Method 24 shall be used to determine the VOC content of coatings. Misc: There are no miscellaneous requirements.
K011	4.96 pounds OC per hour, and 21.71 tons OC per year.	31-05		N	N	Y	N	Y	Y	OR: There are no operational restrictions applicable to this emissions limitation. M: There are no monitoring requirements associated with this emissions limitation. R: Record name, identification, and VOC content of each inside spray coating and cleanup material employed in this emissions unit. Maintain records to show continuous compliance with the Ohio EPA Air Toxics Policy. Rp: Submit deviation reports for exceedance of hourly and annual permitted emissions limitations. ET: Use record keeping to show compliance with applicable emissions limitation. Misc: Compliance with the Ohio EPA Air Toxics Policy.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

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