



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

04/25/01

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

15-76-13-0634  
Central States Can Co. - A Crown Cork & Seal Co.  
Edwin D Griffith Mr  
700 16th Street S.E.  
Massillon, OH 44648-0642

Dear Edwin D Griffith:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 09/23/99. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency  
Jim Orlemann, Manager, Engineering Section  
Division of Air Pollution Control  
P.O.Box 1049  
Columbus, OH 43216-1049

and

Canton Division of Air Pollution Control  
420 Market Avenue N.  
Canton, OH 44702-1544  
(330) 489-3385

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

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

cc: Canton Division of Air Pollution Control  
Becky Castle, DAPC PMU



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## Ohio EPA

State of Ohio Environmental Protection Agency

### PRELIMINARY PROPOSED TITLE V PERMIT

Date: 04/25/01

Effective Date: **To be entered upon final issuance**

Expiration Date: **To be entered upon final issuance**

This document constitutes issuance to:

Central States Can Co. - A Crown Cork & Seal Co.  
700 16th Street S.E.  
Massillon, OH 44648-0642

of a Title V permit for Facility ID: 15-76-13-0634

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

K003 (C-01)

Litho coater surface coating of aluminum or steel sheets

K005 (B-33/34)

Post coaters - 2pc can coating - additional interior coating for ends

K006 (B-35/36)

Post coaters - 2pc can coating - additional interior coating for ends

K007 (B-37-38)

Post coaters - 2pc can coating additional interior coating for ends

K008 (B-02)

Blank line - Can end sealing compound coating line, food cans

K010 (B-03)

Blank line - Can end sealing compound coating line, food cans

K011 (B-04)

Blank line - Can end sealing compound coating line, food cans

K012 (B-05)

Blank line - Can end sealing compound coating line, food cans

K013 (B-06)

Blank line - Can end sealing compound coating line, food cans

K014 (C-07)

Blank line - Can end sealing compound coating line, food cans

K016 (B-09)

Blank line - Can end sealing compound coating line, food cans

K017 (B-24)

Blank line - Can end sealing compound coating line, food cans

K018 (B-25)

Blank line - Can end sealing compound coating line, food cans

K019 (B-26)

Blank line - Can end sealing compound coating line, food cans

K020 (B-99)

Blank line - Can end sealing compound coating line, food cans

K021 (B-28)

Blank line - Can end sealing compound coating line, food cans

K022 (B-29)

Blank line - Can end sealing compound coating line, food cans

K023 (C-10)

Blank line - Can end sealing compound coating line, food cans

K026 (B-73)

Blank line - Can end sealing compound coating line, food cans

K027 (C-02)

Litho coater sheet coating line for non-beverage can manufacturing

K029 (A-11)

Blank line - Can end sealing compound coating line, food cans

K030 (B-65)

Blank line - Can end sealing compound coating line, food cans

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:

Canton Division of Air Pollution Control  
420 Market Avenue N.  
Canton, OH 44702-1544  
(330) 489-3385

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

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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 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. 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 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 3745-77-08.

- 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.

**18. Insignificant Activity**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

## **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 Federally Enforceable 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 Enforceable Section**

**None**

### **B. State Only Enforceable Section**

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

K024 - blank end coating line - water based - A - 30/31;  
K025 - lid line assembly line B - 64;  
Z003 - two-color printing press;  
Z004 - blank line - can end sealing compound coating line, food cans;  
Z005 - blank line - can end sealing compound coating line, food cans;  
Z006 - blank line - can end sealing compound coating line, food cans;  
Z007 - cold cleaners for metal; and  
Z008 - end sealing compound - storage tank.

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:** C-01 (K003)

**Activity Description:** Litho coater surface coating of aluminum or steel sheets

#### 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>
Litho Coater C-01 used for over varnish, and interior and exterior basecoating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

##### 2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K003 shall not exceed the value calculated from the following equation:

$$Ad = V1 \times L1 \times ((D1-C1)/(D1-L1)) + V2 \times L2 \times ((D2-C2)/(D2-L2)) + \dots + Vn \times Ln \times ((Dn-Cn)/(Dn-Ln))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K003;

C = the VOC content of each coating employed in emissions unit K003 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K003, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K003, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D)(2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K003.

## II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Measurement units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.

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

5. The permittee shall collect and record the following information for each day for the line and control equipment
  - a. the name and identification 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;
  - c. the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - d. the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - e. the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.I.2.a; and
  - f. the actual daily VOC emissions ( $E_d$ ) from emissions unit K003, calculated in accordance with the following equation:

$$E_d = V_1 \times C_1 \times (1-F_1) + V_2 \times C_2 \times (1-F_2) + \dots + V_n \times C_n \times (1-F_n)$$

where:

$E_d$  = the actual pounds of VOC emissions for the day;

$V$  = the volume of each coating employed for the day in emissions unit K003, in gallons, excluding water and exempt solvents;

$F$  = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);

$i$  = a subscript denoting a specific coating employed; and

$n$  = the total number of surface coatings employed in emissions unit K003.

6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K003 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

#### **V. Testing Requirements**

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

- 1.a Emission Limitation:

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.

2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - b. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

#### **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>
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**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:** B-33/34 (K005)

**Activity Description:** Post coaters - 2pc can coating - additional interior coating for ends

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Litho Coater B-33/34 used for over varnish, and interior and exterior basecoating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

##### 2. Additional Terms and Conditions

- Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K005 shall not exceed the value calculated from the following equation:

$$Ad = V1 \times L1 \times ((D1-C1)/(D1-L1)) + V2 \times L2 \times ((D2-C2)/(D2-L2)) + \dots + Vn \times Ln \times ((Dn-Cn)/(Dn-Ln))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K005;

C = the VOC content of each coating employed in emissions unit K005 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K005, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K005, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D)(2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K005.

## II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Measurement units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.

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

5. The permittee shall collect and record the following information for each day for the line and control equipment
  - a. the name and identification 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;
  - c. the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - d. the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - e. the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.I.2.a; and
  - f. the actual daily VOC emissions ( $E_d$ ) from emissions unit K005, calculated in accordance with the following equation:

$$E_d = V_1 \times C_1 \times (1-F_1) + V_2 \times C_2 \times (1-F_2) + \dots + V_n \times C_n \times (1-F_n)$$

where:

$E_d$  = the actual pounds of VOC emissions for the day;

$V$  = the volume of each coating employed for the day in emissions unit K005, in gallons, excluding water and exempt solvents;

$F$  = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);

$i$  = a subscript denoting a specific coating employed; and

$n$  = the total number of surface coatings employed in emissions unit K005.

6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K005 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

#### **V. Testing Requirements**

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

- 1.a Emission Limitation:

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.

2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - b. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

#### **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>
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**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:** B-35/36 (K006)

**Activity Description:** Post coaters - 2pc can coating - additional interior coating for ends

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Litho Coater B-35/36 used for over varnish, and interior and exterior base coating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

##### 2. Additional Terms and Conditions

- Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K006 shall not exceed the value calculated from the following equation:

$$Ad = V1 \times L1 \times ((D1-C1)/(D1-L1)) + V2 \times L2 \times ((D2-C2)/(D2-L2)) + \dots + Vn \times Ln \times ((Dn-Cn)/(Dn-Ln))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K006;

C = the VOC content of each coating employed in emissions unit K006 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K006, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K006, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D)(2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K006.

## II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Measurement units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.

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

5. The permittee shall collect and record the following information for each day for the line and control equipment
- the name and identification of each coating, as applied;
  - the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.I.2.a; and
  - the actual daily VOC emissions ( $E_d$ ) from emissions unit K006, calculated in accordance with the following equation:

$$E_d = V_1 \times C_1 \times (1-F_1) + V_2 \times C_2 \times (1-F_2) + \dots + V_n \times C_n \times (1-F_n)$$

where:

$E_d$  = the actual pounds of VOC emissions for the day;

$V$  = the volume of each coating employed for the day in emissions unit K006, in gallons, excluding water and exempt solvents;

$F$  = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);

$i$  = a subscript denoting a specific coating employed; and

$n$  = the total number of surface coatings employed in emissions unit K006.

6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
- all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K006 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

#### **V. Testing Requirements**

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

- 1.a Emission Limitation:

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.

2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - b. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

#### **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>
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**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:** B-37-38 (K007)

**Activity Description:** Post coaters - 2pc can coating additional interior coating for ends

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Litho Coater B-37/38 used for over varnish, and interior and exterior basecoating of food can surfaces. The coater is a 12" Wagner unit equipped with a non-fossil, fuel-fired heated oven and a catalytic incinerator for emissions control.	OAC rule 3745-21-09(D)(3)(a)	alternative daily emission limitation as described in section A.I.2.a

##### 2. Additional Terms and Conditions

- Pursuant to OAC rule 3745-21-09(D)(3), the actual daily VOC emissions from emissions unit K007 shall not exceed the value calculated from the following equation:

$$Ad = V1 \times L1 \times ((D1-C1)/(D1-L1)) + V2 \times L2 \times ((D2-C2)/(D2-L2)) + \dots + Vn \times Ln \times ((Dn-Cn)/(Dn-Ln))$$

where:

Ad = the pounds of VOC emissions allowed for the day from emissions unit K007;

C = the VOC content of each coating employed in emissions unit K007 in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC content of each coating employed in emissions unit K007, in pounds of VOC per gallon of VOC ( a standard of 7.36 may be used if it is used for all coatings employed);

V = the volume of each coating employed for the day in emissions unit K007, in gallons, excluding water and exempt solvents;

L = the emission limitation for each coating employed, as specified in OAC rule 3745-21-09 (D)(1) or (D)(2), in pounds of VOC per gallon of coating, excluding water and exempt solvents;

i = a subscript denoting a specific surface coating employed; and

n = the total number of surface coatings employed in emissions unit K007.

## II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Measurement units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day the coating line and control equipment operates:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.

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

5. The permittee shall collect and record the following information for each day for the line and control equipment
  - a. the name and identification 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;
  - c. the density of the VOC content of each coating, in pounds of VOC per gallon of VOC, unless the standard density of 7.36 is recorded for use in calculating the alternative daily emission limitation;
  - d. the volume of each coating, as applied, in gallons, excluding water and exempt solvents;
  - e. the pounds of VOC allowed for the day, calculated in accordance with the equation in section A.I.2.a; and
  - f. the actual daily VOC emissions ( $E_d$ ) from emissions unit K007, calculated in accordance with the following equation:

$$E_d = V_1 \times C_1 \times (1-F_1) + V_2 \times C_2 \times (1-F_2) + \dots + V_n \times C_n \times (1-F_n)$$

where:

$E_d$  = the actual pounds of VOC emissions for the day;

$V$  = the volume of each coating employed for the day in emissions unit K007, in gallons, excluding water and exempt solvents;

$F$  = the fraction by weight of VOC emissions from the coatings which are controlled by the incinerator. (The overall control efficiency shall be based upon the most recent emission test that demonstrated compliance with the alternative daily emission limitation.);

$i$  = a subscript denoting a specific coating employed; and

$n$  = the total number of surface coatings employed in emissions unit K007.

6. All records, monitoring data, testing data and supporting information required pursuant to this permit shall be retained for a period of five years.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
3. The permittee shall notify the Canton local air agency, in writing, of any daily records showing that the calculated, actual daily VOC emissions from emissions unit K007 exceeds the allowable alternative daily emission limitation. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the exceedance occurs.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

#### **V. Testing Requirements**

1. Compliance with the alternative daily emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

- 1.a Emission Limitation:

alternative daily emissions limitation as described in section A.I.2.a

Applicable Compliance Method:

Compliance shall be demonstrated based upon the calculation specified in section A.I.2.a and the record keeping requirements specified in section A.III.5.

2. The permittee shall conduct emission testing for this emissions unit within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date in accordance with the following requirements:
  - a. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - b. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - c. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

#### **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>
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**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:** B-02 (K008)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-02. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-03 (K010)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-03. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-04 (K011)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-04. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-05 (K012)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-05. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-06 (K013)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-06. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** C-07 (K014)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as C-07. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-09 (K016)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-09. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-24 (K017)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-24. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-25 (K018)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-25. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-26 (K019)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-26. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-99 (K020)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
Blank line can end sealing compound coating line designated as B-99. Emissions unit is uncontrolled.	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  See A.II.1 below.
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating line:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. Compliance with the coating restriction in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

## **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>
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**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:** B-28 (K021)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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>
B-28 blank line can end sealing compound coating line; Dewey and Almy, Model 800 lining machine and Fleetwood packing station. Coating is applied using a 40 psi pressurized application system. The emissions unit is uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 15-0437)	The total emissions of volatile organic compounds (VOC) from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.
	OAC rule 3745-21-09(D)(1)(e)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D). 3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09 (D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents  See A.II.1 below.

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

- The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
- The permittee shall limit the total use of coating materials in emissions units K021 and K022, combined, to 16,819 gallons per year.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for emissions units K021 and K022:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating employed;
  - d. the name and identification number of each cleanup material employed;
  - e. the VOC content of each cleanup material employed;
  - f. the number of gallons of each cleanup material employed; and
  - g. the total VOC emissions from all coatings and cleanup materials employed, in tons.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.
3. The permittee shall maintain records of the calculated annual VOC emissions from this emissions unit, in tpy. This value shall be calculated by summing the monthly total VOC emission values for the calendar year.
4. The permittee also shall maintain records of the total number of gallons of coatings used per year.

### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports, by January 31 of each year, that identify the following for the previous calendar year:
  - a. the total VOC emissions from emissions units K021 and K022; and
  - b. the total gallons of coatings employed for emissions units K021 and K022.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

**1.a** Emission Limitation:

3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

The total emissions of VOC from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.3.

**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>
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**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:** B-29 (K022)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
B-29 blank line can end sealing compound coating line; Dewey and Almy, Model 800 lining machine and Fleetwood packing station. Coating is applied using a 40 psi pressurized application system. The emissions unit is uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 15-0437)	The total emissions of volatile organic compounds (VOC) from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.
	OAC rule 3745-21-09(D)(1)(e)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D). 3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09 (D)(2)(e)	See A.II.1 below. 3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
- The permittee shall limit the total use of coating materials in emissions units K021 and K022, combined, to 16,819 gallons per year.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for emissions units K021 and K022:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating employed;
  - d. the name and identification number of each cleanup material employed;
  - e. the VOC content of each cleanup material employed;
  - f. the number of gallons of each cleanup material employed; and
  - g. the total VOC emissions from all coatings and cleanup materials employed, in tons.
2. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.
3. The permittee shall maintain records of the calculated annual VOC emissions from this emissions unit, in tpy. This value shall be calculated by summing the monthly total VOC emission values for the calendar year.
4. The permittee also shall maintain records of the total number of gallons of coatings used per year.

### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports, by January 31 of each year, that identify the following for the previous calendar year:
  - a. the total VOC emissions from emissions units K021 and K022; and
  - b. the total gallons of coatings employed for emissions units K021 and K022.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

**1.a** Emission Limitation:

3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

The total emissions of VOC from emissions units K021 and K022, combined, shall not exceed 39.42 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1 and A.III.3.

**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>
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**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:** C-10 (K023)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
This process is a two-piece food can process using a compound coating to seal the ends. The process designation is C-10. Coating is accomplished using a Dewey & Almy Model 800 lining machine. The emissions unit utilizes a Nordson catalytic incinerator to reduce VOC emissions. The process includes an electric furnace.	OAC rule 3745-31-05(A)(3) (PTI 15-1176)	2.2 lbs/hr of volatile organic compounds (VOC) 9.64 tpy of VOC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D).  See A.I.2.a below.
	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

- These emission limitations include VOC emissions resulting from the use of both cleanup and coating materials.
- The catalytic incinerator shall operate with an overall control efficiency of at least 76.5%.

##### II. Operational Restrictions

- The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
- The permittee shall employ no more than 1,752 gallons of cleanup materials per year in this emissions unit.
- The permittee shall employ no more than 19,272 gallons of coating materials per year in this emissions unit.
- The permittee shall not employ any photochemically reactive material for cleanup in this emissions unit.
- The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

6. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emissions test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall maintain records of the following during the operation of this emissions unit:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the name and company identification of each coating (as applied) and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon as applied;
  - d. the total uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit in tons of VOC for the month;
  - e. documentation as to whether or not each cleanup material employed is a photochemically reactive material; and
  - f. the number of operating hours for this emissions unit.

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

4. The permittee shall maintain records of the total annual number of gallons of all coating materials used for this emissions unit annually.
5. The permittee shall maintain records of the total number of gallons of all cleanup materials used for this emissions unit annually.
6. The permittee shall maintain records of the annual controlled VOC emission rate for this emissions unit. This value is calculated by multiplying the sum of the total monthly uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit for the calendar year by the factor of one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.
7. The permittee shall maintain monthly records of the controlled average hourly VOC emission rate for this emissions unit. This VOC emission rate shall be determined by dividing each monthly uncontrolled VOC emission value by the number of hours this emissions unit operated during the month and multiplying this number by one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.

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

8. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
9. The permittee shall maintain in their files a detailed and signed catalyst evaluation report from the testing conducted. The report shall provide the name and address of the testing company, date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future capability to meet the control and capture efficiencies required by this permit based on their expertise and the test report data.

### **IV. Reporting Requirements**

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and be sent to the Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly records showing an exceedance of the 2.2 lbs/hr limitation for VOC and/or showing the use of any cleanup material that is a photochemically reactive material.
3. The permittee shall submit annual reports by January 31 of each year that identify the following for this emissions unit for the previous calendar year:
  - a. the tons of VOC emissions;
  - b. the gallons of cleanup materials used; and
  - c. the gallons of coatings used.
4. The permittee shall submit quarterly temperature deviation reports that identify the following:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
5. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
6. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "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:

2.2 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.

**1.c** Emission Limitation:

9.64 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6.

**1.d** Emission Limitation:

The catalytic incinerator shall operate with an overall control efficiency of at least 76.5%.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control efficiency.

**2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 12 months following the effective date of this permit and between 3.0 and 3.5 years after the initial compliance test date.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall control efficiency limitation for VOC.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, 40 CFR Part 60, Appendix A, Methods 25 or 25A. The test methods which must be employed to demonstrate compliance with the overall control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

## **V. Testing Requirements (continued)**

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544 within 30 days following completion of the tests.

## **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>
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**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:** B-73 (K026)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
This process is a two- and three-piece food can end seal compound coating line designated B-73. The lining machine is a Dewey and Almy Model 800 system complete with a fossil, fuel-fired drying oven. The emissions unit utilizes a CSD-D-300 catalytic incinerator to reduce VOC emissions.	OAC rule 3745-31-05(A)(3) (PTI 15-859)	2.33 lbs/hr of volatile organic compounds (VOC) 53.6 lbs/day of VOC 8 tpy of VOC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D).  See A.I.2.a below.
	OAC rule 3745-21-09(D)(1)(e) and (D)(2)(e)	3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

- These emission limitations include VOC emissions resulting from the use of both cleanup and coating materials.
- The catalytic incinerator shall operate with an overall control efficiency of at least 71.3%. The total overall efficiency is the control efficiency divided by 100 times the capture efficiency divided by 100.

##### II. Operational Restrictions

- The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
- The permittee shall restrict the operation of emissions unit K026 to less than 23 hrs/day and 6,900 hrs/yr of production for this emissions unit. The permittee shall also restrict operation to coating 1,104,000 can ends per day and 331,200,000 can ends per year for this emissions unit.
- The permittee shall not employ any photochemically reactive materials for cleanup in this emissions unit.
- The permittee shall employ no more than 690 gallons of cleanup materials each year in this emissions unit.

## II. Operational Restrictions (continued)

5. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
6. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emissions test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall maintain records of the following during the operation of this emissions unit:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the name and company identification of each coating (as applied) and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon as applied;
  - d. the total uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit in tons of VOC for the month; and
  - e. documentation as to whether or not each cleanup material employed is a photochemically reactive material

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.
4. The permittee shall maintain records of the number of operating hours per day, the number of operating days per year and the number of operating hours per year.
5. The permittee shall maintain records of the number of can ends coated per day and per year for this emissions unit.
6. The permittee shall maintain monthly records of the average controlled hourly VOC emission rate for this emissions unit. This rate shall be determined by dividing the uncontrolled VOC emissions by the number of operating hours in a month and multiplying this number by one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.
7. The permittee shall maintain monthly records of the average controlled daily VOC emission rate for this emissions unit. This rate shall be determined by multiplying the average controlled hourly VOC emission rate by the number of operating hours per day.

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

8. The permittee shall maintain records of the annual controlled VOC emission rate for this emissions unit. This value is calculated by multiplying the sum of the total monthly uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit for the calendar year by the factor of one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance.
9. The permittee shall maintain records of the total gallons of cleanup material used each year.
10. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
11. The permittee shall maintain in its files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future overall control capabilities, based on their expertise and the test report data.

### **IV. Reporting Requirements**

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and be sent to the Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly records showing an exceedance of the following limitations:
  - a. 2.33 lbs/hr and/or 53.6 lbs/day of VOC; and
  - b. 23 operating hrs/day and/or 1,104,000 can ends coated per day.
3. The permittee shall submit annual reports by January 31 of each year that identify the following for the previous calendar year:
  - a. the operating hours per year;
  - b. the number of can ends coated per year;
  - c. the tons of VOC emissions per year; and
  - d. the gallons of cleanup materials employed.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall submit quarterly temperature deviation reports that identify the following:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
5. The permittee shall notify the Canton local air agency, in writing, of the findings resulting from the inspection of the catalyst bed or the analysis of the bed catalyst. Notification shall include the date of the findings, any problems detected with the catalyst, and actions being taken to remediate those problems. Notification shall be submitted to the Canton local air agency within 30 days following the inspection.
6. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly records showing the use of any cleanup material that is a photochemically reactive material.
7. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
2.33 lbs/hr of VOC  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.  
  
Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.
  - 1.b Emission Limitation:  
53.6 lbs/day of VOC  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.
  - 1.c Emission Limitation:  
  
The catalytic incinerator shall operate with an overall control efficiency of at least 71.3%.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control efficiency.

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

3.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

**1.e** Emission Limitation:

9.64 tpy of VOC

Applicable Compliance Method:

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

**2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 12 months following the effective date of this permit and between 3.0 and 3.5 years after the initial compliance test date.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall control efficiency limitation for VOC.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, 40 CFR Part 60, Appendix A, Methods 25 or 25A. The test methods which must be employed to demonstrate compliance with the overall control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration and on a consideration of the potential presence of interfering gases.

## **V. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates of the tests and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544 within 30 days following completion of the tests.

## **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>
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**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:** C-02 (K027)

**Activity Description:** Litho coater sheet coating line for non-beverage can manufacturing

#### 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>
Process C-02 is a litho coating line for interior and exterior basecoat and overvarnish coating of three-piece cans. The process consists of a Dexter sheet feeder, a 12-inch Wagner Spot Coater, one natural, gas-fired Feco 140 ft. D.E.F. curing oven, and one CSM System, Torvex Model 70 catalytic incinerator.	OAC rule 3745-31-05(A)(3) (PTI 15-1127, Synthetic Minor)	16 lbs/hr of volatile organic compounds (VOC)  See A.I.2.a and A.I.2.b below.
	OAC rule 3745-21-09(B)(6)	0.51 lb/hr of nitrogen oxides (NOx)  See A.I.2.d below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(B)(6).  See A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a The VOC emissions limitation, in lbs/hr, includes all VOC emissions from coatings and cleanup materials.
- 2.b The total tons of VOC contained in the coatings and cleanup materials employed by this emissions unit shall not exceed 200 tons during any rolling, 365-day period and 16.6 tons in any month.
- 2.c The catalytic incinerator shall provide an overall control efficiency of at least eighty-one percent (81%), by weight, and a control destruction efficiency of not less than ninety percent (90%), by weight, for the VOC emissions vented to the control system.
- 2.d The NOx emissions limitation, in lb/hr, represents emissions from fuel combustion in the oven. It does not represent emissions generated by the catalytic incinerator.

##### II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

2. The average temperature differences across the catalyst bed, for any 3-hour block of time when the emissions unit was in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall maintain records of the following during the operation of the emissions unit:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed is more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average difference during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - c. a daily log or record of downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit (the log shall include any operational problems and/or malfunctions which reduce the average control efficiency, causes for those episodes and corrective actions to resolve the problem).
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in their files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, the date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future capability to meet the control and capture efficiencies required by this permit based on their expertise and the test report data.

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

5. The permittee shall maintain daily records of the following information for the emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in lbs VOC/gallon, as applied;
  - d. the number of operating hours for this emissions unit;
  - e. the total calculated, uncontrolled VOC emissions from all coatings and cleanup materials in pounds or tons;
  - f. the total calculated, controlled VOC emissions in pounds or tons from all coatings and cleanup materials (This value is calculated by multiplying the total calculated, uncontrolled pounds of VOC emission rate by a factor of one minus the overall control efficiency/100. The overall control efficiency shall be from the most recently approved performance test demonstrating compliance with the control efficiency limits in this permit.);
  - g. the total calculated tons of VOC contained in all coatings and cleanup materials employed during any rolling, 365-day period for this emissions unit; and
  - h. the controlled average hourly VOC emission rate for this emissions unit. (This VOC emission rate shall be determined by dividing each daily uncontrolled VOC emission value by the number of hours this emissions unit operated during the day and multiplying this number by one minus the overall control efficiency/100. The overall control efficiency shall be the one that had been determined during the last approved stack test demonstrating compliance with the control efficiency limits in this permit.)
6. The permittee shall maintain monthly records of the total tons of VOC contained in all coatings and cleanup materials employed during any month in this emissions unit.
7. The permittee shall monitor and record the number of cubic feet of gas employed by the oven on a daily basis and the number of hours the catalytic incinerator operated per day.
8. The permittee shall maintain daily records of the calculated hourly NO<sub>x</sub> emission rate. This value can be calculated by multiplying the NO<sub>x</sub> emission factor of 94 pounds of NO<sub>x</sub>/mmscf by the actual cubic feet of natural gas burned per day in the catalytic incinerator, and then dividing by the number of actual operating hours in the day.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any rolling, 365-day period when the VOC emissions from all coatings and cleanup materials exceeded 200 tons of VOC.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any month when the VOC emissions from all coatings and cleanup materials exceeded 16.6 tons of VOC.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any day when the calculated, controlled VOC emission rate exceeded 16 lbs/hr of VOC.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any day when the calculated, controlled NO<sub>x</sub> emission rate exceeded 0.51 lb/hr of NO<sub>x</sub>.

#### **IV. Reporting Requirements (continued)**

6. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

16 lbs/hr of VOC

Applicable Compliance Method:

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

Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.

- 1.b Emission Limitation:

200 tons of VOC contained in all coatings and cleanup materials employed during any rolling, 365-day period

Applicable Compliance Method:

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

- 1.c Emission Limitation:

16.6 tons of VOC contained in all coatings and cleanup materials employed during any month

Applicable Compliance Method:

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

- 1.d Emission Limitation:

The catalytic incinerator shall provide an overall control efficiency of at least eighty-one percent (81%), by weight, and a control destruction efficiency of not less than ninety percent (90%), by weight, for the VOC emissions vented to the control system.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control efficiency.

- 1.e Emission Limitation:

0.51 lb/hr of NO<sub>x</sub>

Applicable Compliance Method:

Multiply the NO<sub>x</sub> emission factor of 94 pounds of NO<sub>x</sub>/mmscf by the actual cubic feet of natural gas burned per day in the catalytic incinerator, and then divide by the number of actual operating hours in the day. See the record keeping requirements specified in section A.III.8.

The NO<sub>x</sub> emission factor was obtained from AP-42, 5th Edition, Volume 1, "Stationary Paint and Area Sources", Chapter 1, Section 1.4 "Natural Gas Combustion (Supplement D)", Table 1-4.1, dated July, 1998.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial date of testing.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC specified in section A.I.1 and the control efficiency and overall control efficiency limitations for VOC specified in section A.I.2.c.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for VOC, 40 CFR Part 60, Appendix A, Method 25 or 25A. The test methods which must be employed to demonstrate compliance with the control efficiency and overall control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
  - e. The capture efficiency shall be determined using Methods 204 through 204 F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - f. The control efficiency (i.e.: the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emissions test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

3. If required, the permittee shall demonstrate compliance with any emission limitation or restriction in this permit in accordance with the methods and procedures specified in OAC rule 3745-15-04.

## 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>
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**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:** A-11 (K029)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Two-piece and three-piece can blank end sealing compound coating line designated as A-11. The process consists of one Dewey and Almy Model 800 lining machine with a low pressure pumping applicator. The system is uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 15-1216)	7.68 lbs/hr of volatile organic compounds (VOC)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D).  See A.I.2.a below.
	OAC rule 3745-21-09(D)(1)(e) and (D)(2)(e)	3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents  See A.II.1 below.

##### 2. Additional Terms and Conditions

- This hourly emission limitation includes VOC emissions resulting from the use of both coatings and cleanup materials.

##### II. Operational Restrictions

- The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
- The permittee shall not employ photochemically reactive materials for cleanup.
- This emissions unit shall only coat ends for food cans. No beverage can ends shall be coated. Beverage can means any two-piece steel or aluminum container in which soft drink or beer, including malt liquor, are packaged. The definition does not include containers in which fruit or vegetable juices are packaged.
- The permittee shall employ no more than 13,730 gallons of coatings and 690 gallons of cleanup materials each year in this emissions unit.

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records which list the following information for this emissions unit:
  - a. the name and company identification of each coating (as applied) and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon, as applied;
  - d. the total uncontrolled VOC emissions from all coatings and cleanup materials employed in this emissions unit, in tons of VOC for the month;
  - e. documentation as to whether or not each cleanup material employed is a photochemically reactive material
  - f. the number of operating hours for this emissions unit; and
  - g. the average hourly uncontrolled VOC emission rate, in lbs/hr.

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall maintain records of the number of can ends coated on a monthly basis (i.e., food vs. beverage).
3. The permittee shall maintain records of the total number of gallons of coatings employed in this emissions unit annually.
4. The permittee shall maintain records of the total number of gallons of cleanup materials employed in this emissions unit annually.

### **IV. Reporting Requirements**

1. The permittee shall notify the Canton local air agency, in writing, of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and be sent to the Canton local air agency within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports by January 31 of each year that identify the number of gallons of cleanup materials and the number of gallons of coatings employed at this emissions unit during the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the 7.68 lbs/hr of VOC emission limitation;
  - b. the use of any photochemically reactive materials for cleanup; and
  - c. the coating of any beverage can ends.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

## V. Testing Requirements (continued)

### 1.a Emission Limitation:

3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. The phrase "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:

7.68 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Compliance shall also be demonstrated based upon the emission testing procedures specified in section A.V.2.

## 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack testing date.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for VOC, 40 CFR Part 60, Appendix A, Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544 within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton local air agency.

**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>
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**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:** B-65 (K030)

**Activity Description:** Blank line - Can end sealing compound coating line, food cans

#### 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>
This process is a two- and three-piece food can process using a compound coating to seal the ends. The process designation is B-65. Coating is accomplished using a Dewey & Almy Model 800 lining machine. The emissions unit utilizes a Nordson catalytic incinerator to reduce VOC emissions. The process includes an electric furnace.	OAC rule 3745-31-05(A)(3) (PTI 15-1302)	36 lbs/day of volatile organic compounds (VOC) 0.468 ton/month of VOC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D).  See A.I.2.a below.
	OAC rule 3745-21-09(D)(1)(e)	3.7 pounds of VOC/gallon of coating (excluding water and exempt solvents)
	OAC rule 3745-21-09(D)(2)(e)	3.7 pounds of VOC/gallon of coating (excluding water and exempt solvents)

##### 2. Additional Terms and Conditions

- 2.a The emission limitations include VOC emissions resulting from both coatings and cleanup materials employed at this emissions unit.
- 2.b The emissions from this emissions unit shall be vented to a catalytic incinerator that shall have an overall control efficiency of at least 67.5%, by weight.

##### II. Operational Restrictions

1. The permittee shall employ only compliant coatings (i.e., each coating complies with the applicable emission limit as applied) in this emissions unit.
2. The permittee shall not employ any photochemically reactive materials in this emissions unit.
3. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

4. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emissions test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall continuously monitor the temperature of the inlet and exhaust gases of the catalytic incinerator serving this emissions unit and record the following:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - c. a log or record of downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The catalyst bed material shall be inspected once during the effective permit period for general catalyst condition and any signs of potential catalyst depletion as recommended by the manufacturer. The permittee shall also collect a representative sample of the catalyst from the incinerator, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above a 90% overall control efficiency. Selection of the testing company and procedures shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be conducted when temperature monitoring records indicate a problem with the bed. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once during the effective period of the permit. The Canton local air agency shall be informed of the date of any inspections or sample collections at least 30 days prior.
4. The permittee shall maintain in their files a detailed and signed catalyst evaluation report from the testing company for the testing conducted. The report shall provide the name and address of the testing company, date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future capability to meet the overall control efficiency of 67.5% based on their expertise and the test report data.

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

5. The permittee shall maintain monthly records which list the following information for this emissions unit:
  - a. the name and company identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating (as applied) and cleanup material employed, in pounds of VOC per gallon of coating as applied;
  - d. documentation as to whether or not each cleanup material employed is a photochemically reactive material
  - e. the total uncontrolled VOC emissions from all coatings and cleanup materials employed for this emissions unit, in tons and pounds; and
  - f. the number of days of operation during the month.

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

6. The permittee shall record and maintain records of the total controlled VOC emission rate in lbs VOC/day and lbs VOC/month. These values shall be calculated as follows:
  - a. for lbs VOC/day, multiply the total uncontrolled calculated VOC emissions from all coatings and cleanup materials employed monthly for this emissions unit, in pounds, by a factor of  $(1 - \text{overall control efficiency}/100)$  and divide this number by the number of operating days in the month; and
  - b. for tons VOC/month, multiply the total uncontrolled VOC emissions from all coatings and cleanup materials employed monthly for this emissions unit, in tons, by a factor of  $(1 - \text{overall control efficiency}/100)$ .

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly temperature deviation reports as follows:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall notify the Canton local air agency in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
  - a. any exceedance of the emission limitations of 36 lbs/day and 0.468 ton/month of VOC; and
  - b. any use of photochemically reactive materials for cleanup.
4. The permittee shall submit a copy of any catalyst evaluation report to the Canton local air agency within 30 days of the receipt of the report by the permittee from the catalyst testing company.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

36 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.5 and A.III.6.

**1.b** Emission Limitation:

0.468 ton/month of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.5 and A.III.6.

**1.c** Emission Limitation:

3.7 pounds of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of coatings. The phrase "VOC content" means all volatile organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

**1.d** Emission Limitation:

The catalytic incinerator shall operate with an overall control efficiency of at least 67.5%, by weight.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2. Overall control efficiency shall be calculated by multiplying the capture efficiency times the control efficiency.

**2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 12 months following the effective date of this permit and between 3.0 and 3.5 years from the initial stack test date.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for VOC specified in section A.I.2.b.

c. The test methods which must be employed to demonstrate compliance with the overall control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test shall be conducted while the emissions unit is operating at its maximum capacity utilizing the coating material containing the greatest VOC content of those coatings currently employed, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

## **V. Testing Requirements (continued)**

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e.: the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit's operating parameters, the time(s) and date(s) of the test(s) and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test.

Personnel from the Canton local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the tests.

## **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>
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**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**

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