



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

06/08/00

CERTIFIED MAIL

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

03-87-04-0189
Crown Cork & Seal Company, Inc.
Mr. Rich Jones
29200 Glenwood Rd.
Perrysburg, OH 43551

Dear Rich Jones:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 03/31/99. The comment period 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 or with agreed-upon changes, then you have the opportunity to schedule a meeting with us to discuss your concerns.

Please contact Jim Orlemann, Engineering Section Manager, 614-644-3592, or you can telefax your request to (614) 644-3681, within fourteen (14) days from receipt of this letter if a meeting is desired. If a request for a meeting is not received within fourteen (14) days of receipt of this letter, we will forward this proposed permit (as written, or with agreed-upon changes) to USEPA for approval.

Very truly yours,

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

cc: Northwest District Office
Becky Castle, DAPC PMU



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 06/08/00

PRELIMINARY PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

Crown Cork & Seal Company, Inc.
29200 Glenwood Rd.
Perrysburg, OH 43551

of a Title V permit for Facility ID: 03-87-04-0189

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

K001 (Sheet Coater #1)

Sheet baseoating operation for three piece cans and ends w/oven and afterburner

K002 (Sheet Coater #2)

Sheet baseoating operation for three piece cans and ends w/oven and afterburner

K004 (Spray clad line)

Three piece can interior body spray w/oven

K009 (Can assembly line #4)

Three piece can assembly line w/side seam stripe

K010 (Can assembly line #5)

Three piece can assembly line w/side seam stripe

K015 (End press #6)

Food can end press w/ compound applicators

K016 (End press #7)

Food can end press w/ compound applicators

K017 (End press #8)

Food can end press w/ compound applicators

K018 (End press #9)

Food can end press w/ compound applicators

K019 (End press #10)

Food can end press w/ compound applicators

K021 (Can assembly line #2)
Three piece can assembly line w/side seam stripe

K023 (Can assembly line #8)
Three piece can assembly line w/side seam stripe

K024 (Can assembly line #1)
Three piece can assembly line w/side seam stripe

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable 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.

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 the facility:

- G002 - Diesel fuel dispensing
- L001 - Parts washer #1
- L002 - Parts washer #2
- L003 - Parts washer #3
- L004 - Parts washer #4
- L005 - Parts washer #5
- T001 - Compound Tank
- Z006 - Parts washer #6
- Z002 - Parts washer #7
- Z004 - Ink Dot Applicators
- Z005 - Video jet applicators

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 PTI for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Sheet Coater #1 (K001)

Activity Description: Sheet basecoating operation for three piece cans and ends w/oven and afterburner

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>
sheet coater #1 (basecoat coating line) equipped with a thermal incinerator	OAC rule 3745-21-09 (B)(6)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a In lieu of complying with the pounds of volatile organic compounds (VOC)/gallon of solids requirement in OAC Rule 3745-21-09 (D)(2)(a), the permittee shall comply with the following control limitations:
 - i. The capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions vented to the control equipment (thermal incinerator).
 - ii. The thermal incinerator shall maintain a minimum VOC destruction efficiency of 90%, by weight.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, 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.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

1. The permittee shall conduct or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the overall VOC control efficiency requirement of 81% and the minimum destruction efficiency requirement of 90%.
 - 1.c The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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.) 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. 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.

Facility Name: **Crown Cork & Seal Company, Inc.**

Facility ID: **03-87-04-0189**

Emissions Unit: **Sheet Coater #1 (K001)**

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 appropriate Ohio EPA District Office or 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or 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: Sheet Coater #2 (K002)

Activity Description: Sheet basecoating operation for three piece cans and ends w/oven and afterburner

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>
sheet coater #2 (basecoat coating line) equipped with a thermal incinerator	OAC rule 3745-21-09 (B)(6)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a In lieu of complying with the pounds of volatile organic compounds (VOC)/gallon of solids requirement in OAC Rule 3745-21-09 (D)(2)(a), the permittee shall comply with the following control limitations:
 - i. The capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions vented to the control equipment (thermal incinerator).
 - ii. The thermal incinerator shall maintain a minimum VOC destruction efficiency of 90%, by weight.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, 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.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

1. The permittee shall conduct or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the overall VOC control efficiency requirement of 81% and the minimum destruction efficiency requirement of 90%.
 - 1.c The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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.) 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. 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.

Facility Name: **Crown Cork & Seal Company, Inc.**

Facility ID: **03-87-04-0189**

Emissions Unit: **Sheet Coater #2 (K002)**

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 appropriate Ohio EPA District Office or 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or 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: Spray clad line (K004)

Activity Description: Three piece can interior body spray w/oven

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>
three-piece can interior body spray w/ oven (spray clad line)	OAC rule 3745-21-09 (D)(2)(c)	4.2 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	0.551 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC Rule 3745-21-09 (D)(2)(c) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the following information each month for this emissions unit:
 - The name and identification number of each coating, as applied.
 - The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

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

- 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

3. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above emission limitation based upon the record keeping requirements in section A.III.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:

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

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

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

- 1.c** Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:
OAC 3745-17-03(B)(1)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<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: Can assembly line #4 (K009)

Activity Description: Three piece can assembly line w/side seam stripe

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>
can assembly line # 4 (three-piece can assembly line w/side seam stripe)	OAC rule 3745-21-09 (D)(2)(d)	5.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	0.551 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC Rule 3745-21-09 (D)(2)(d) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

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

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

2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.
3. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
5.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above emission limitation based upon the record keeping requirements in section A.III.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

V. Testing Requirements (continued)

1.b Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:

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

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

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

1.c Emission Limitation:
20% opacity, except as provided by rule

Applicable Compliance Method:
OAC 3745-17-03(B)(1)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<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: Can assembly line #5 (K010)

Activity Description: Three piece can assembly line w/side seam stripe

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>
three-piece food can assembly line w/ side-seam stripe; line #5	OAC rule 3745-31-05 (PTI #03-8882)	6.8 tons VOC/year, based upon a rolling, 12-month summation, from the application of side-seam coatings and all cleanup materials
	OAC rule 3745-21-09 (D)(2)(d)	5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.
2. The maximum annual side-seam coating usage for this emissions unit shall not exceed 2,443 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all coatings used.
3. The maximum annual cleanup material usage for this emissions unit shall not exceed 15 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all cleanup materials used.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and exempt solvents, as applied.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all side-seam coatings and cleanup materials employed [summation of (b X e) for all side-seam coatings + summation of (c X d) for all cleanup materials], in tons.
 - g. The total number of gallons of all side-seam coatings employed.
 - h. The total number of gallons of all cleanup materials employed.
 - i. The rolling, 12-month summation of all side-seam coatings employed, in gallons.
 - j. The rolling, 12-month summation of all cleanup materials employed, in gallons.
 - k. The rolling, 12-month summation of VOC emissions from all side-seam coatings and cleanup materials, in tons.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the limitations on the rolling, 12- month side-seam coating usage (gallons), the rolling, 12-month cleanup material usage (gallons), and the rolling, 12-month VOC emissions (tons). These reports shall be submitted in accordance with section A.1.c of the permit's General Terms and Conditions.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

- 1.a** Emission Limitation:
5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents

Applicable Compliance Method:

The record keeping requirements in section A.III of this permit shall be used to demonstrate compliance with the above VOC limitation.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- 1.b** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:

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

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60%, from 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

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

- 1.c** Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:

OAC 3745-17-03(B)(1)

- 1.d** Emission Limitation:
6.8 tons VOC/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above VOC limitation based upon the record keeping requirements in section A.III of this permit.

VI. Miscellaneous Requirements

None

B. State 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>
three-piece food can assembly line w/ side seam stripe; line #5	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K010) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde
 TLV microgram/cubic meter (ug/m³): 370
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 6.8
 MAGLC (ug/m³): 8.8

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: End press #6 (K015)
Activity Description: Food can end press w/ compound applicators

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>
food can end press line #6 w/ compound applicators	OAC rule 3745-21-09 (D)(2)(e)	3.7 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

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

2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

IV. Reporting Requirements

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

V. Testing Requirements

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

Emission Limitation:

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above emission limitation based upon the record keeping requirements in section A.III.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

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: End press #7 (K016)
Activity Description: Food can end press w/ compound applicators

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>
food can end press line #7 w/ compound applicators	OAC rule 3745-21-09 (D)(2)(e)	3.7 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.

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

2. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit.

IV. Reporting Requirements

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

V. Testing Requirements

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

Emission Limitation:

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above emission limitation based upon the record keeping requirements in section A.III.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

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: End press #8 (K017)
Activity Description: Food can end press w/ compound applicators

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>
3-piece food can end press # 8 w/ compound applicators	OAC Rule 3745-31-05 (PTI #03-11340)	10.73 lbs volatile organic compounds (VOC)/hr, from the application of end sealing compound coatings (see A.I.2.b.) 1168 lbs VOC/month, from the application of cleanup materials
	OAC 3745-21-09(D)(2)(e)	See A.I.2.a. 3.7 lbs VOC/gallon of coating, excluding water and exempt solvents, from the application of end sealing compound coatings

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed 27.73 TPY (from the coating and cleanup material usage), based upon a rolling, 12-month summation of the monthly VOC input rates.
- 2.b The 10.73 pounds/hour VOC emission limitation above was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The number of gallons of each coating employed, excluding water and exempt solvents, as applied.
 - c. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.
 - d. The VOC emissions for each coating (b x c), in pounds.
 - e. The total VOC emissions for all coatings (summation of d for all coatings), in pounds.
 - f. The name and identification number of each cleanup material employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The VOC content of each cleanup material, in pounds/gallon.
 - i. The VOC emissions for each cleanup material (g x h), in pounds.
 - j. The total VOC emissions for all cleanup materials (summation of i for all cleanup materials), in pounds.
 - k. The total VOC emissions for all coatings and cleanup materials (j + e), in pounds.
 - l. The rolling 12-month VOC emission rate for all coatings and cleanup materials, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports of all exceedances of the rolling, 12-month VOC emission limitation for all coatings and cleanup materials. These reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
10.73 lbs VOC/hour, from all coatings

Applicable Compliance Method:
The permittee shall demonstrate compliance with the emission limitation above by multiplying the maximum coating usage (gallon/day) by the maximum VOC content of all coatings used (3.7 lbs VOC/gallon of coating).

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.7 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- 1.c** Emission Limitations:
27.73 TPY, based up on a rolling, 12-month summation of the monthly VOC emissions from all coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

- 1.d** Emission Limitation:
1168 lbs VOC/month, from all cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

VI. Miscellaneous Requirements

None

B. State 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>
3-piece food can end press # 8 w/ compound applicators	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K017) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane
 TLV microgram/cubic meter (ug/m³): 176,000
 Maximum Hourly Emission Rate (lbs/hr): 31.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1654
 MAGLC (ug/m³): 4190

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: End press #9 (K018)

Activity Description: Food can end press w/ compound applicators

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>
3-piece food can end press # 9 w/ compound applicators	OAC Rule 3745-31-05 (PTI #03-11340)	9.62 lbs volatile organic compounds (VOC)/hr, from the application of end sealing compound coatings (see A.I.2.b)
	OAC 3745-21-09(D)(2)(e)	1168 lbs VOC/month, from the application of cleanup materials See A.I.2.a. 3.7 lbs VOC/gallon of coating, excluding water and exempt solvents, from the application of end sealing compound coatings

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed 28.72 TPY (from the coating and cleanup material usage), based upon a rolling, 12-month summation of the monthly VOC input rates.
- 2.b The 9.62 pounds/hour VOC emission limitation above was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The number of gallons of each coating employed excluding water and exempt solvents, as applied.
 - c. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.
 - d. The VOC emissions for each coating (b x c), in pounds.
 - e. The total VOC emissions for all coatings (summation of d for all coatings), in pounds.
 - f. The name and identification number of each cleanup material employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The VOC content of each cleanup material, in pounds/gallon.
 - i. The VOC emissions for each cleanup material (g x h), in pounds.
 - j. The total VOC emissions for all cleanup materials (summation of i for all cleanup materials), in pounds.
 - k. The total VOC emissions for all coatings and cleanup materials (j + e), in pounds.
 - l. The rolling 12-month VOC emission rate for all coatings and cleanup materials in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports of all exceedances of the rolling, 12-month VOC emission limitation for all coatings and cleanup materials. These reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
9.62 lbs VOC/hour, from all coatings

Applicable Compliance Method:
The permittee shall demonstrate compliance with the emission limitation above by multiplying the maximum coating usage (gallon/day) by the maximum VOC content of all coatings used (3.7 lbs VOC/gallon of coating).

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.7 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- 1.c** Emission Limitations:
28.72 TPY, based up on a rolling, 12-month summation of the monthly VOC emissions from all coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

- 1.d** Emission Limitation:
1168 lbs VOC/month, from all cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

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>
3-piece food can end press # 8 w/ compound applicators	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (K018) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane
 TLV microgram/cubic meter (ug/m³): 176,000
 Maximum Hourly Emission Rate (lbs/hr): 31.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1654
 MAGLC (ug/m³): 4190

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: End press #10 (K019)

Activity Description: Food can end press w/ compound applicators

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>
3-piece food can end press # 10 w/ compound applicators	OAC Rule 3745-31-05 (PTI #03-11340)	10.73 lbs volatile organic compounds (VOC)/hr, from the application of end sealing compound coatings (see A.I.2.b) 1168 lbs VOC/month, from the application of cleanup materials See A.I.2.a.
	OAC 3745-21-09(D)(2)(e)	3.7 lbs VOC/gallon of coating, excluding water and exempt solvents, from the application of end sealing compound coatings

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall not exceed 35.92 TPY (from the coating and cleanup material usage), based upon a rolling, 12-month summation of the monthly VOC input rates.
- 2.b The 10.73 pounds/hour VOC emission limitation above was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC Rule 3745-21-09 (D)(2)(e) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The number of gallons of each coating employed excluding water and exempt solvents, as applied.
 - c. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents, as applied.
 - d. The VOC emissions for each coating (b x c), in pounds.
 - e. The total VOC emissions for all coatings (summation of d for all coatings), in pounds.
 - f. The name and identification number of each cleanup material employed.
 - g. The number of gallons of each cleanup material employed.
 - h. The VOC content of each cleanup material, in pounds/gallon.
 - i. The VOC emissions for each cleanup material (g x h), in pounds.
 - j. The total VOC emissions for all cleanup materials (summation of i for all cleanup materials), in pounds.
 - k. The total VOC emissions for all coatings and cleanup materials (j + e), in pounds.
 - l. The rolling 12-month VOC emission rate for all coatings and cleanup materials, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports of all exceedances of the rolling, 12-month VOC emissions limitations for all coatings and cleanup materials. These reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
10.73 lbs VOC/hour, from all coatings

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above by multiplying the maximum coating usage (gallon/day) by the maximum VOC content of all coatings used (3.7 lbs VOC/gallon of coating).

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.7 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- 1.c** Emission Limitations:
35.92 TPY, based up on a rolling, 12-month summation of the monthly VOC emissions from all coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

- 1.d** Emission Limitation:
1168 lbs VOC/month, from all cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the record keeping requirements in section A.III.

VI. Miscellaneous Requirements

None

B. State 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>
3-piece food can end press # 10 w/ compound applicators	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K019) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane
 TLV microgram/cubic meter (ug/m³): 176,000
 Maximum Hourly Emission Rate (lbs/hr): 31.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1654
 MAGLC (ug/m³): 4190

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can assembly line #2 (K021)
Activity Description: Three piece can assembly line w/side seam stripe

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>
three-piece food can assembly line # 2 w/ side-seam stripe	OAC rule 3745-31-05 (PTI #03-11340)	9.91 lbs volatile organic compounds (VOC)/hr and 7.8 tons VOC/year, based upon a rolling, 12-month summation, from the application of side-seam coatings (see section A.I.2.a)
		114.1 lbs VOC/month and .05 TPY VOC, based upon a rolling, 12-month summation, from all cleanup materials
		0.1 lb particulate emissions (PE)/hr
		0.44 TPY PE
	OAC rule 3745-21-09 (D)(2)(d)	5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	See A.I.2.b.
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a The 9.91 pounds/hour VOC emission limitation above was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this emission limitation.

2. Additional Terms and Conditions (continued)

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
- a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and exempt solvents, as applied.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all side-seam coatings employed [summation of (b X e) for all side-seam coatings], in tons.
 - g. The total VOC emissions from cleanup materials employed [summation of (c X d) for all cleanup materials], in tons.
 - h. The rolling, 12-month summation of VOC emissions from all side-seam coatings, in tons.
 - i. The rolling, 12-month summation of VOC emissions from all cleanup materials, in tons.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the limitations on the monthly VOC emissions from all cleanup materials used, the rolling, 12-month VOC emissions from all cleanup materials used, and the rolling, 12-month VOC emissions from the application of side-seam coatings. These reports shall be submitted in accordance with section A.1.c of the this permit's General Terms and Conditions.

IV. Reporting Requirements (continued)

3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

- 1.a Emission Limitation:
5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents

Applicable Compliance Method:

The record keeping requirements in section A.III of this permit shall be used to demonstrate compliance with the above VOC limitation.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- 1.b Emission Limitation:
0.1 lb/hr PE
0.44 TPY

Applicable Compliance Method:

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

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 and dividing by 2000).

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

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

Applicable Compliance Method:

OAC 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.d Emission Limitation:
7.8 tons VOC/rolling, 12-month summation, from the application of side- seam coatings

0.05 tons VOC/rolling, 12-month summation, from all cleanup materials used

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above VOC limitations based upon the record keeping requirements in section A.III of this permit.

1.e Emission Limitation:
9.91 lbs VOC/hr, from the application of side-seam coatings

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above VOC limitation based upon multiplying the maximum coating usage (gallons/hr) by the maximum VOC content of all side-seam coatings (5.5 lbs VOC/gallon of side-seam coating).

1.f Emission Limitation:
114.1 lbs VOC/month, from cleanup material usage

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above VOC limitation the record keeping requirements in section A.III of this permit.

VI. Miscellaneous Requirements

None

B. State 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>
three-piece food can assembly line # 2 w/ side-seam stripe	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K021) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MIBK (methyl isobutyl ketone)
 TLV microgram/cubic meter (ug/m³): 4190
 Maximum Hourly Emission Rate (lbs/hr): 9.91
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 661.9
 MAGLC (ug/m³): 4880.95

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can assembly line #8 (K023)

Activity Description: Three piece can assembly line w/side seam stripe

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>
three-piece food can assembly line w/ side-seam stripe; line #8	OAC rule 3745-31-05 (PTI #03-8882)	7.4 tons VOC/year, based upon a rolling, 12-month summation, from the application of side-seam coatings and all cleanup materials
	OAC rule 3745-21-09 (D)(2)(d)	5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.
- The maximum annual side-seam coating usage for this emissions unit shall not exceed 2,652.6 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all coatings used.
- The maximum annual cleanup material usage for this emissions unit shall not exceed 15 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all cleanup materials used.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and exempt solvents, as applied.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all side-seam coatings and cleanup materials employed [summation of (b X e) for all side-seam coatings + summation of (c X d) for all cleanup materials], in tons.
 - g. The total number of gallons of all side-seam coatings employed.
 - h. The total number of gallons of all cleanup materials employed.
 - i. The rolling, 12-month summation of all side-seam coatings employed, in gallons.
 - j. The rolling, 12-month summation of all cleanup materials employed, in gallons.
 - k. The rolling, 12-month summation of VOC emissions from all side-seam coatings and cleanup materials, in tons.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the limitations on the rolling, 12- month side-seam coating usage (gallons), the rolling, 12-month cleanup material usage (gallons), and the rolling, 12-month VOC emissions (tons). These reports shall be submitted in accordance with section A.1.c of the this permit's General Terms and Conditions.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

- 1.a** Emission Limitation:
5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents

Applicable Compliance Method:

The record keeping requirements in section A.III of this permit shall be used to demonstrate compliance with the above VOC limitation.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- 1.b** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:

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

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60%, from 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

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

- 1.c** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

OAC 3745-17-03(B)(1)

- 1.d** Emission Limitation:
7.2 tons VOC/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above VOC limitation based upon the record keeping requirements in section A.III of this permit.

Facility Name: **Crown Cork & Seal Company, Inc.**

Facility ID: **03-87-04-0189**

Emissions Unit: **Can assembly line #8 (K023)**

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
2562.6 gallons of coatings/rolling, 12-month summation
15 gallons of cleanup materials/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the gallon usage restrictions based upon the record keeping requirements in section A.III of this permit.

VI. Miscellaneous Requirements

None

B. State 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>
three-piece food can assembly line w/ side seam stripe; line #8	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K023) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde
 TLV microgram/cubic meter (ug/m³): 370
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 6.8
 MAGLC (ug/m³): 8.8

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can assembly line #1 (K024)

Activity Description: Three piece can assembly line w/side seam stripe

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>
three-piece food can assembly line # 1 w/ side-seam stripe	OAC rule 3745-31-05 (PTI #03-8882)	14.1 tons volatile organic compounds (VOC)/year, based upon a rolling, 12-month summation, from the application of side-seam coatings and all cleanup materials
		7.59 lbs VOC/gallon of cleanup material
	OAC rule 3745-21-09 (D)(2)(d)	5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents
	OAC rule 3745-17-11 (B)(2)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall only use coatings in this emissions unit that comply with the applicable emission limitation in OAC rule 3745-21-09 (D)(2)(d) on an "as applied" basis.
- The maximum annual side-seam coating usage for this emissions unit shall not exceed 5076.2 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all coatings used.
- The maximum annual cleanup material usage for this emissions unit shall not exceed 15 gallons, based upon a rolling, 12-month summation of the total monthly gallons of all cleanup materials used.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each side-seam coating and cleanup material, as applied.
 - b. The VOC content of each side-seam coating, in pounds VOC/gallon of coating, excluding water and exempt solvents, as applied.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each cleanup material employed.
 - e. The number of gallons of each-side seam coating employed, excluding water and exempt solvents, as applied.
 - f. The total VOC emissions from all side-seam coatings and cleanup materials employed [summation of (b X e) for all side-seam coatings + summation of (c X d) for all cleanup materials], in tons.
 - g. The total number of gallons of all side-seam coatings employed.
 - h. The total number of gallons of all cleanup materials employed.
 - i. The rolling, 12-month summation of all side-seam coatings employed, in gallons.
 - j. The rolling, 12-month summation of all cleanup materials employed, in gallons.
 - k. The rolling, 12-month summation of VOC emissions from all side-seam coatings and cleanup materials, in tons.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying side-seam coatings and cleanup materials in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the limitations on the rolling, 12- month side-seam coating usage (gallons), the rolling, 12-month cleanup material usage (gallons), and the rolling, 12-month VOC emissions (tons). These reports shall be submitted in accordance with section A.1.c of the this permit's General Terms and Conditions.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

- 1.a** Emission Limitation:
5.5 lbs VOC/gallon of side-seam coating, excluding water and exempt solvents

7.59 lbs VOC/gallon of cleanup material

Applicable Compliance Method:

The record keeping requirements in section A.III of this permit shall be used to demonstrate compliance with the above VOC limitations.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

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

- 1.b** Emission Limitation:
0.551 lb/hr PE

Applicable Compliance Method:

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

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60%, from 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

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

- 1.c** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

OAC 3745-17-03(B)(1)

- 1.d** Emission Limitation:
14.1 tons VOC/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above VOC limitation based upon the record keeping requirements in section A.III of this permit.

- 1.e** Emission Limitations:
5076.6 gallons of side-seam coatings/rolling, 12-month summation
15 gallons of cleanup materials/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above gallon usage restrictions based upon the record keeping requirements in section A.III of this permit.

Facility Name: **Crown Cork & Seal Company, Inc.**
Facility ID: **03-87-04-0189**
Emissions Unit: **Can assembly line #1 (K024)**

VI. Miscellaneous Requirements

None

B. State 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>
three-piece food can assembly line # 1 w/ side-seam stripe	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K024) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Diisobutyl Ketone
 TLV microgram/cubic meter (ug/m³): 145,000
 Maximum Hourly Emission Rate (lbs/hr): 6.98
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,181
 MAGLC (ug/m³): 3,500

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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