



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

01/31/00

**CERTIFIED MAIL**

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

01-25-04-0914  
Metal Container Corporation  
Mr. Shelly Parker  
350 McCormick Boulevard  
Columbus, OH 43213-1586

Dear Mr. Shelly Parker:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/30/99. 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,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive, flowing style.

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

cc: Central District Office  
Becky Castle, DAPC PMU



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## Ohio EPA

State of Ohio Environmental Protection Agency

### PRELIMINARY PROPOSED TITLE V PERMIT

Date: 01/31/00

Effective Date:

Expiration Date:

*The duration of this permit will be five years.*

This document constitutes issuance to:

Metal Container Corporation  
350 McCormick Boulevard  
Columbus, OH 43213-1586

of a Title V permit for Facility ID: 01-25-04-0914

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

K007 (Can Line No. 1)

Can Line 1 includes a washer and drying oven; basecoater and oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usages.

K008 (Can Line No. 2)

Can Line 2 includes a washer and drying oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usage.

K009 (Can Line No. 3)

Can Line 3 includes a washer and drying oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usage.

K010 (Can Line No. 4)

Can Line 4 includes a washer and drying oven; basecoater and oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usages.

K011 (Inside Respray)

The respray operation is used for application of inside spray for cans which do not pass the quality control check point and includes inside spray machines and oven.

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:

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

## OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable 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.6 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 applicable, the permittee shall 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”); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management 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 and to the Administrator of U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

### **14. Operational Flexibility**

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

## **15. Emergencies**

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

## **16. Off Permit Changes**

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

## **17. Compliance Method Requirements**

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

## **18. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## **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 of state-only enforceable 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 state-only required 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. 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).

### **4. 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.

### **5. 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.

### **6. 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. Pursuant to Permit to Install 01-1399 issued February 4, 1987, the facility shall not emit more than 383.7 tons of VOC per year without applying for and obtaining a Permit to Install from the Ohio EPA.
2. The following insignificant emissions units are located at this facility:

B001 - Process Water Heater - PH-1;  
B002 - Process Water Heater - PH-2;  
B003 - Process Water Heater - PH-3;  
B004 - Process Water Heater - PH-4;  
L001 - Solvent Parts Cleaner (SK-1);  
L002 - Solvent Parts Cleaner (SK-2);  
P001 - Can Bodymaker and Trimmer;  
P002 - Welding Shop with Exhaust;  
P003 - Aluminum Scrap Handling System with Cyclone;  
P004 - Lime Storage Silo;  
P005 - Shot Blaster;  
T001 - Base Coat Bulk Storage Tank;  
T002 - Inside Spray Bulk Storage Tank;  
T003 - Overvarnish Bulk Storage Tank;  
T004 - Waste Oil Storage Tank A;  
T005 - Waste Oil Storage Tank B;  
T006 - Waste Oil Storage Tank C;  
T007 - Overvarnish Day Storage Tank;  
T008 - Inside Spray Day Storage Tank;  
T009 - Basecoater Day Storage Tank;  
T010 - D&I Bulk Lube Storage Tank;  
T011 - Diesel Fuel Storage Tank (500 gallons);  
Z001 - Inker Cleaner;  
Z002 - Washer Chemical Tank (10,000 gallons - 35% Sulfuric acid);  
Z003 - Wastewater Tank - CE Tank 1;  
Z004 - Wastewater Tank - CE Tank 2; and  
Z005 - Wastewater Tank - CE Tank 3.

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

3. The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions:
  - a. The name and identification of each coating and cleanup material employed;
  - b. The VOC content of each cleanup material, in pounds per gallon;
  - c. The number of gallons of each cleanup material employed;
  - d. The VOC content of each coating material employed;
  - e. The number of gallons of each coating material employed; and
  - f. The total VOC emissions from all coating and cleanup materials employed, in pounds or tons.

**B. State Only Enforceable Section (continued)**

4. The permittee shall submit to the Ohio EPA (Central District Office) annual reports which specify the total VOC emissions from this facility for the previous calendar year (i.e., January through December). Annual VOC emissions shall be obtained by summation of the monthly VOC emissions from Part II, Section B.3 for the calendar year (i.e., January through December). These reports shall be submitted by April 15 of each year. The annual fee emissions report may be used by the facility in lieu of the VOC annual reports to demonstrate compliance with the facility-wide VOC emission limitation.
5. USEPA Method 24 shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Can Line No. 1 (K007)

**Activity Description:** Can Line 1 includes a washer and drying oven; basecoater and oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usages.

#### 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>
Can Line No.1 (K007) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), and Mist Eliminator (Munter), Basecoater & Oven (5.6 MMBtu/hr), Decorator (printing, overvarnish and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine(s) & Oven (6.0 MMBtu/hr), and use of cleanup solvent.	40 CFR Part 60, Subpart WW (40 CFR 60.492)	The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:
		0.29 kilogram of VOC per liter (2.42 pounds of VOC per gallon) of coating solids from each two-piece can exterior basecoating operation.
		0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.
		0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.
	OAC rule 3745-21-09(D)(1)(d)	The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(b)	The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(D)(1)(c)	The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(a)	The VOC content of coatings used in each two-piece can basecoat coating line shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-17-11(A)(4)	Total allowable particulate emissions from application of basecoat, bottom varnish, overvarnish, and inside spray coating materials in this emissions unit shall not exceed 1.07 pounds PM per hour.
	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. The permittee shall operate the settling chamber for the overspray whenever the inside spray coating is in operation.
2. The permittee shall operate the filter whenever the basecoating material is applied in this emissions unit.

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

1. The permittee shall collect and record the following information each month for Can Line No.1 (K007):
  - a. The name and identification number of each exterior basecoat, overvarnish, and inside spray coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each exterior basecoat, overvarnish, and inside spray coating, as applied.
  - c. The monthly volume-weighted average VOC content of all exterior basecoat, overvarnish, and inside spray coatings, as applied, calculated in accordance with the performance test and compliance provisions specified in 40 CFR 60.493. This average need not be determined if all exterior basecoat, overvarnish, and inside spray coatings have VOC contents less than the applicable VOC limitations specified in 40 CFR 60.492.

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

2. The permittee shall collect and record the following information each month for the Can Line No.1 (K007):
  - a. The name and identification number of each exterior basecoat, bottom varnish, overvarnish, and inside spray coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
3. The permittee shall maintain daily records that document any time periods when the filter was not in service during operation of this emissions unit.
4. 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 the settling chamber. 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 (Ohio EPA Central District Office) in writing of any monthly record showing that the monthly volume-weighted average VOC content of all exterior basecoats, overvarnish coatings, and/or inside spray coatings exceed(s) the applicable lbs VOC/gallon of solids limitation(s). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing the use of noncomplying exterior basecoat, bottom varnish, overvarnish, or inside spray coatings (for the lbs/gallon of coating limitations). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any daily record showing that the filter was not in service during operation of this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days after the event occurs.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving the settling chamber 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. Emissions Limitation:

The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:

0.29 kilogram of VOC per liter (2.42 pounds of VOC per gallon) of coating solids from each two-piece can exterior basecoating operation.

0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.

0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.1. USEPA Method 24 shall be used to determine the VOC contents for all exterior basecoats, overvarnish, and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 2. Emissions Limitation:

The VOC content of coatings used in each two-piece can basecoat coating line shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.2. USEPA Method 24 shall be used to determine the VOC contents for exterior basecoat, exterior bottom varnish, overvarnish, and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 3. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with the methods outlined in OAC 3745-17-03 (B)(1).

## V. Testing Requirements (continued)

### 4. Emissions Limitation:

Allowable particulate emissions from this emissions unit shall not exceed 1.07 pounds PM per hour.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by using the maximum non-volatiles (solids) content and the average hourly application rate of each exterior basecoat, bottom varnish, overvarnish, and inside spray coating applied in this emissions unit. Multiply the average hourly coatings application rate, in gallons per hour, by their respective coating densities, in pounds per gallon, to get the coating mass application rate, in pounds per hour. Then multiply the mass application rate for each coating by its respective solids content (% solids) to obtain the solids emissions rate. The maximum hourly controlled particulate emissions rate is obtained from the following equation using the estimated solids transfer efficiency (TE) and the particulate control efficiency (CE):

$$\text{PM Emissions (lbs/hr)} = \text{Sum}[\text{Coating application rate (gal/hr)} \times \text{Coating density (lbs/gal)} \times \text{Solids content (\% solids)} \times (1 - \text{TE}) \times (1 - \text{CE})]$$

For basecoat material, a coating transfer efficiency of 80% and a particulate control efficiency of 99% (filter media) shall be utilized.

For overvarnish material, a coating transfer efficiency of 100% shall be assumed.

For bottom varnish material, a coating transfer efficiency of 100% shall be assumed.

For inside spray coating material, a coating transfer efficiency of 94% and a particulate control efficiency of 60% (settling chamber) shall be utilized.

## 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>
Can Line No.1 (K007) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), and Mist Eliminator (Munter), Basecoater & Oven (5.6 MMBtu/hr), Decorator (printing, overvarnish and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine(s) & Oven (6.0 MMBtu/hr), and use of cleanup solvent.	OAC rule 3745-31-05 PTI # 01-1399	Best Available Technology (BAT) is compliance with the applicable emissions limitations in 40 CFR 60.492 and OAC rule 3745-21-09(D)(1).

**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 Line No. 2 (K008)

**Activity Description:** Can Line 2 includes a washer and drying oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usage.

#### 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>
Can Line No.2 (K008) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), Decorator-1 and Decorator-2 (printing, overvarnish, and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine & Oven (6.0 MMBtu/hr), and cleanup solvent use.	40 CFR Part 60, Subpart WW (40 CFR 60.492)	The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:
		0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.
		0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.
	OAC rule 3745-21-09(D)(1)(d)	The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(b)	The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(c)	The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(A)(4)	Total allowable particulate emissions from application of bottom varnish, overvarnish, and inside spray coating materials in this emissions unit shall not exceed 0.78 pound PM per hour.
	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. The permittee shall operate the settling chamber for the overspray whenever the inside spray coating is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for Can Line No.2 (K008):
  - a. The name and identification number of each overvarnish and inside spray coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each overvarnish, and inside spray coating, as applied.
  - c. The monthly volume-weighted average VOC content of all overvarnish and inside spray coatings, as applied, calculated in accordance with the performance test and compliance provisions specified in 40 CFR 60.493. This average need not be determined if all overvarnish and inside spray coatings have VOC contents less than the applicable VOC limitations specified in 40 CFR 60.492.
2. The permittee shall collect and record the following information each month for the Can Line No.2 (K008):
  - a. The name and identification number of each bottom varnish, overvarnish, and inside spray coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
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 the settling chamber. 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 (Ohio EPA Central District Office) in writing of any monthly record showing that the monthly volume-weighted average VOC content of all overvarnish and/or inside spray coatings exceed(s) the applicable lbs VOC/gallon of solids limitation(s). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing the use of noncomplying bottom varnish, overvarnish, and inside spray coatings (for the lbs/gallon of coating limitations). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days following the end of the calendar month.
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 the settling chamber 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. Emissions Limitation:

The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:

0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.

0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.1. USEPA Method 24 shall be used to determine the VOC contents for all overvarnish and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Emissions Limitation:

The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.2. USEPA Method 24 shall be used to determine the VOC contents for exterior basecoat, exterior bottom varnish, overvarnish, and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## V. Testing Requirements (continued)

### 3. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with the methods outlined in OAC 3745-17-03 (B)(1).

### 4. Emissions Limitation:

Allowable particulate emissions from this emissions unit shall not exceed 0.78 pound PM per hour.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by using the maximum non-volatiles (solids) content and the maximum hourly application rate of each exterior bottom varnish, overvarnish, and inside spray coating applied in this emissions unit. Multiply the maximum hourly coatings application rate, in gallons per hour, by their respective coating densities, in pounds per gallon, to get the coating mass application rate, in pounds per hour. Then multiply the mass application rate for each coating by its respective solids content (% solids) to obtain the solids emissions rate. The maximum hourly controlled particulate emissions rate is obtained from the following equation using the estimated solids transfer efficiency (TE) and the particulate control efficiency (CE):

$$\text{PM Emissions (lbs/hr)} = \text{Coating application rate (gal/hr)} \times \text{Coating density (lbs/gal)} \times \text{Solids content (\% solids)} \times (1 - \text{TE}) \times (1 - \text{CE})$$

For overvarnish, a coating transfer efficiency of 100% shall be assumed.

For bottom varnish, a coating transfer efficiency of 100% shall be assumed.

For inside spray coating, a coating transfer efficiency of 94% and a particulate control efficiency of 60% (settling chamber) shall be utilized.

## 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>
Can Line No.2 (K008) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), Decorator-1 and Decorator-2 (printing, overvarnish, and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine & Oven (6.0 MMBtu/hr), and cleanup solvent use.	OAC rule 3745-31-05 PTI # 01-1399	Best Available Technology (BAT) is compliance with the applicable emissions limitations in 40 CFR 60.492 and OAC rule 3745-21-09(D)(1).

**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 Line No. 3 (K009)

**Activity Description:** Can Line 3 includes a washer and drying oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usage.

#### 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>
Can Line No.3 (K009) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), Decorator-1 and Decorator-2 (printing, overvarnish, and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine & Oven (6.0 MMBtu/hr), and cleanup solvent use.	40 CFR Part 60, Subpart WW (40 CFR 60.492)	The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:
		0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.
		0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.
	OAC rule 3745-21-09(D)(1)(d)	The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(b)	The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(c)	The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(A)(4)	Total allowable particulate emissions from application of bottom varnish, overvarnish, and inside spray coating materials in this emissions unit shall not exceed 0.78 pound PM per hour.
	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

## 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. The permittee shall operate the settling chamber for the overspray whenever the inside spray coating is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for Can Line No.3 (K009):
  - a. The name and identification number of each overvarnish and inside spray coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each overvarnish, and inside spray coating, as applied.
  - c. The monthly volume-weighted average VOC content of all overvarnish and inside spray coatings, as applied, calculated in accordance with the performance test and compliance provisions specified in 40 CFR 60.493. This average need not be determined if all overvarnish and inside spray coatings have VOC contents less than the applicable VOC limitation(s) specified in 40 CFR 60.492.
2. The permittee shall collect and record the following information each month for the Can Line No.3 (K009):
  - a. The name and identification number of each bottom varnish, overvarnish, and inside spray coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
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 the settling chamber. 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 (Ohio EPA Central District Office) in writing of any monthly record showing that the monthly volume-weighted average VOC content of all overvarnish and/or inside spray coatings exceed(s) the applicable lbs VOC/gallon of solids limitation(s). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing the use of noncomplying bottom varnish, overvarnish, and inside spray coatings (for the lbs/gallon of coating limitations). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days following the end of the calendar month.
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 the settling chamber 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. Emissions Limitation:

The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:

0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.

0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.1. USEPA Method 24 shall be used to determine the VOC contents for all overvarnish and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Emissions Limitation:

The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.2. USEPA Method 24 shall be used to determine the VOC contents for exterior basecoat, exterior bottom varnish, overvarnish, and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## V. Testing Requirements (continued)

### 3. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with the methods outlined in OAC 3745-17-03 (B)(1).

### 4. Emissions Limitation:

Allowable particulate emissions from this emissions unit shall not exceed 0.78 pound PM per hour.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by using the maximum non-volatiles (solids) content and the maximum hourly application rate of each exterior bottom varnish, overvarnish, and inside spray coating applied in this emissions unit. Multiply the maximum hourly coatings application rate, in gallons per hour, by their respective coating densities, in pounds per gallon, to get the coating mass application rate, in pounds per hour. Then multiply the mass application rate for each coating by its respective solids content (% solids) to obtain the solids emissions rate. The maximum hourly controlled particulate emissions rate is obtained from the following equation using the estimated solids transfer efficiency (TE) and the particulate control efficiency (CE):

$$\text{PM Emissions (lbs/hr)} = \text{Coating application rate (gal/hr)} \times \text{Coating density (lbs/gal)} \times \text{Solids content (\% solids)} \times (1 - \text{TE}) \times (1 - \text{CE})$$

For overvarnish, a coating transfer efficiency of 100% shall be assumed.

For bottom varnish, a coating transfer efficiency of 100% shall be assumed.

For inside spray coating, a coating transfer efficiency of 94% and a particulate control efficiency of 60% (settling chamber) shall be utilized.

## 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>
Can Line No.3 (K009) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), Decorator-1 and Decorator-2 (printing, overvarnish, and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine & Oven (6.0 MMBtu/hr), and cleanup solvent use.	OAC rule 3745-31-05 PTI # 01-1399	Best Available Technology (BAT) is compliance with the applicable emissions limitations in 40 CFR 60.492 and OAC rule 3745-21-09(D)(1).

**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 Line No. 4 (K010)

**Activity Description:** Can Line 4 includes a washer and drying oven; basecoater and oven; printer, over varnisher, bottom varnisher, and oven; inside sprayer and oven; and cleanup solvent usages.

#### 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>
Can Line No.4 (K010) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), and Mist Eliminator (Munter), Basecoater & Oven (5.6 MMBtu/hr), Decorator (printing, overvarnish and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine(s) & Oven (6.0 MMBtu/hr), and use of cleanup solvent.	40 CFR Part 60, Subpart WW (40 CFR 60.492)	The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:
		0.29 kilogram of VOC per liter (2.42 pounds of VOC per gallon) of coating solids from each two-piece can exterior basecoating operation.
		0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.
		0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.
	OAC rule 3745-21-09(D)(1)(d)	The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(b)	The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(D)(1)(c)	The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(D)(1)(a)	The VOC content of coatings used in each two-piece can basecoat coating line shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-17-11(A)(4)	Total allowable particulate emissions from application of basecoat, bottom varnish, overvarnish, and inside spray coating materials in this emissions unit shall not exceed 1.07 pounds PM per hour.
	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. The permittee shall operate the settling chamber for the overspray whenever the inside spray coating is in operation.
2. The permittee shall operate the filter whenever the basecoating material is applied in this emissions unit.

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

1. The permittee shall collect and record the following information each month for Can Line No.4 (K010):
  - a. The name and identification number of each exterior basecoat, overvarnish, and inside spray coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each exterior basecoat, overvarnish, and inside spray coating, as applied.
  - c. The monthly volume-weighted average VOC content of all exterior basecoat, overvarnish, and inside spray coatings, as applied, calculated in accordance with the performance test and compliance provisions specified in 40 CFR 60.493. This average need not be determined if all exterior basecoat, overvarnish, and inside spray coatings have VOC contents less than the applicable VOC limitations specified in 40 CFR 60.492.

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

2. The permittee shall collect and record the following information each month for the Can Line No.4 (K010):
  - a. The name and identification number of each exterior basecoat, bottom varnish, overvarnish, and inside spray coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
3. The permittee shall maintain daily records that document any time periods when the filter was not in service during operation of this emissions unit.
4. 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 the settling chamber. 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 (Ohio EPA Central District Office) in writing of any monthly record showing that the monthly volume-weighted average VOC content of all exterior basecoats, overvarnish coatings, and/or inside spray coatings exceed(s) the applicable lbs VOC/gallon of solids limitation(s). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing the use of noncomplying exterior basecoat, bottom varnish, overvarnish, and inside spray coatings(for the lbs/gallon of coating limitations). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any daily record showing that the filter was not in service during operation of this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days after the event occurs.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving the settling chamber 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. Emissions Limitation:

The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month averages:

0.29 kilogram of VOC per liter (2.42 pounds of VOC per gallon) of coating solids from each two-piece can exterior basecoating operation.

0.46 kilogram of VOC per liter (3.84 pounds of VOC per gallon) of coating solids from each overvarnish coating operation.

0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.1. USEPA Method 24 shall be used to determine the VOC contents for all exterior basecoats, overvarnish, and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 2. Emissions Limitation:

The VOC content of coatings used in each two-piece can basecoat coating line shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can exterior bottom end (bottom varnish) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can overvarnish coating operation shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.2. USEPA Method 24 shall be used to determine the VOC contents for exterior basecoat, exterior bottom varnish, overvarnish, and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 3. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with the methods outlined in OAC 3745-17-03 (B)(1).

## V. Testing Requirements (continued)

### 4. Emissions Limitation:

Allowable particulate emissions from this emissions unit shall not exceed 1.07 pounds PM per hour.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by using the maximum non-volatiles (solids) content and the average hourly application rate of each exterior basecoat, bottom varnish, overvarnish, and inside spray coating applied in this emissions unit. Multiply the average hourly coatings application rate, in gallons per hour, by their respective coating densities, in pounds per gallon, to get the coating mass application rate, in pounds per hour. Then multiply the mass application rate for each coating by its respective solids content (% solids) to obtain the solids emissions rate. The maximum hourly controlled particulate emissions rate is obtained from the following equation using the estimated solids transfer efficiency (TE) and the particulate control efficiency (CE):

$$\text{PM Emissions (lbs/hr)} = \text{Sum}[\text{Coating application rate (gal/hr)} \times \text{Coating density (lbs/gal)} \times \text{Solids content (\% solids)} \times (1 - \text{TE}) \times (1 - \text{CE})]$$

For basecoat material, a coating transfer efficiency of 80% and a particulate control efficiency of 99% (filter media) shall be utilized.

For overvarnish material, a coating transfer efficiency of 100% shall be assumed.

For bottom varnish material, a coating transfer efficiency of 100% shall be assumed.

For inside spray coating material, a coating transfer efficiency of 94% and a particulate control efficiency of 60% (settling chamber) shall be utilized.

## 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>
Can Line No.4 (K010) which includes the following equipment: Washer & Oven (4.5 MMBtu/hr), and Mist Eliminator (Munter), Basecoater & Oven (5.6 MMBtu/hr), Decorator (printing, overvarnish and rim varnish) & Oven (5.6 MMBtu/hr), Inside Spray Machine(s) & Oven (6.0 MMBtu/hr), and use of cleanup solvent.	OAC rule 3745-31-05 PTI # 01-1399	Best Available Technology (BAT) is compliance with the applicable emissions limitations in 40 CFR 60.492 and OAC rule 3745-21-09(D)(1).

**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:** Inside Respray (K011)

**Activity Description:** The respray operation is used for application of inside spray for cans which do not pass the quality control check point and includes inside spray machines and 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>
Two Inside Re-spray machines & one Oven (4.0 MMBtu/hr) (K011):	40 CFR Part 60, Subpart WW	The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month average:  0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.
	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from any stack in this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(A)(4)	Allowable particulate emissions from overspray of inside spray coating materials in this emissions unit shall not exceed 0.551 pound PM per hour.
	OAC rule 3745-21-09(D)(1)(c)	The VOC content of coatings used in each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall operate the settling chamber for the overspray whenever the inside spray coating is in operation.

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

1. The permittee shall collect and record the following information each month for each inside spray coating employed in this emissions unit (K011):
  - a. The name and identification number of each inside spray coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each inside spray coating, as applied.
  - c. The monthly volume-weighted average VOC content of all inside spray coatings, as applied, calculated in accordance with the performance test and compliance provisions specified in 40 CFR 60.493. This average need not be determined if all inside spray coatings have VOC contents less than the applicable VOC limitation specified in 40 CFR 60.492.
2. The permittee shall collect and record the following information each month for the Inside Re-spray Machines in this emissions unit (K011):
  - a. The name and identification number of each inside spray coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
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 the settling chamber. 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 (Ohio EPA Central District Office) in writing of any monthly record showing that the monthly volume-weighted average VOC content of all inside spray coatings exceeds the applicable lbs VOC/gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (Ohio EPA Central District Office) in writing of any monthly record showing the use of noncomplying inside spray coatings (for the lbs/gallon of coating limitation). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Central District Office) within 30 days following the end of the calendar month.
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 the settling chamber 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. Emissions Limitation:

VOC emissions from each two-piece can interior body (inside spray) coating operation shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.2. USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 2. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with the methods outlined in OAC 3745-17-03 (B)(1).

### 3. Emissions Limitation:

Allowable particulate emissions from this emissions unit shall not exceed 0.27 pound PM per hour.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by using the maximum non-volatiles (solids) content and the average hourly application rate of each inside spray coating applied in this emissions unit. Multiply the average hourly coatings application rate, in gallons per hour, by their respective coating densities, in pounds per gallon, to get the coating mass application rate, in pounds per hour. Then multiply the mass application rate for each coating by their respective solids content (% solids) to obtain the solids emissions rate. The maximum hourly controlled particulate emissions rate is obtained from the following equation using the estimated solids transfer efficiency (TE) and the particulate control efficiency (CE):

$$\text{PM Emissions (lbs/hr)} = \text{Sum}[\text{Coating application rate (gal/hr)} \times \text{Coating density (lbs/gal)} \times \text{Solids content (\% solids)} \times (1 - \text{TE}) \times (1 - \text{CE})]$$

For inside spray coating, a coating transfer efficiency of 94% and a particulate control efficiency of 60% (settling chamber) shall be utilized.

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

### **4. Emissions Limitation:**

The VOC content of coatings used in this emissions unit shall not exceed the following volume-weighted calendar month average:

0.89 kilogram of VOC per liter (7.43 pounds of VOC per gallon) of coating solids from each two-piece can inside spray coating operation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.1. USEPA Method 24 shall be used to determine the VOC contents for all exterior basecoats, overvarnish, and inside spray coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **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>
Two Inside Re-spray machines & one Oven (4.0 MMBtu/hr) (K011):	OAC rule 3745-31-05 PTI # 01-7830	OC emissions from application of inside spray coatings, excluding cleanup, in this emissions unit shall not exceed 4.96 pounds OC per hour, and 21.71 tons OC per year.  Best Available Technology (BAT) is compliance with the applicable emissions limitations in OAC rule 3745-21-09(D)(1)(c).  See Sections B.V and B.VI:

**2. Additional Terms and Conditions**

- 2.a The permittee shall maintain compliance with the Ohio EPA Air Toxics Policy.

**II. Operational Restrictions**

None

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating, as applied.
  - b. The OC content of each coating, as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed.
  - d. The total OC emissions from all coatings employed, in pounds.
  - e. The total number of hours this emissions unit was operated.
  - f. The average hourly OC emissions from this emissions unit, i.e., d/e, in pounds per hour.
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Ohio EPA Air Toxics Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. A copy of the resulting computer model runs that show the results of the application of the Ohio EPA Air Toxics Policy for the change.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which the average hourly OC emissions from all the inside spray coatings employed in this emissions unit exceeded 4.96 pounds per hour, and the actual average hourly OC emissions for each such day. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days after the event occurs.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year (i.e., January through December). These reports shall be submitted by January 31 of each year. The permittee may choose to submit the annual fee emissions report (FER) due April 15 in lieu of the total VOC emissions report due January 31.

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

1. Emissions Limitation:

Allowable OC emissions from inside re-spray operations in this emissions unit shall not exceed 4.96 pounds OC per hour, and 21.71 tons OC per year.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be based on the record keeping specified in Section B.III.1 of these terms and conditions.

Compliance with the annual VOC emissions limitation shall be the sum of daily VOC emissions for the calendar year.

## VI. Miscellaneous Requirements

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

a. Pollutant: 2-Butoxyethanol

TLV (mg/m<sup>3</sup>): 121 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 1.15

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 77.6 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 2881 ug/m<sup>3</sup>

b. Pollutant: n-Butanol

TLV (mg/m<sup>3</sup>): 303 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 1.10

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 126.1 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 7214.3 ug/m<sup>3</sup>

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

## **VI. Miscellaneous Requirements (continued)**

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

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

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Ohio EPA Air Toxics Policy, determines that the changed emissions unit still satisfies the Ohio EPA Air Toxics Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Ohio EPA Air Toxic Policy for the change.

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

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