

## US CAN CO/NEW CASTLE PLANT



### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

## TITLE V/STATE OPERATING PERMIT

Issue Date: September 27, 2002 July 28, 2003 Effective Date:

**Revision Date:** July 28, 2003 Expiration Date: September 30, 2007

Amendment **Revision Type:** 

> In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

> The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

## TITLE V Permit No: 37-00248

Federal Tax Id - Plant Code: 06-1145011-2

## **Owner Information**

Name: US CAN CO

Mailing Address: 1902 OLD BUTLER RD

NEW CASTLE, PA 16101

### Plant Information

Plant: US CAN CO/NEW CASTLE PLANT

Location: 37 Lawrence County 37917 Shenango Township

SIC Code: 2752 Manufacturing - Commercial Printing, Lithographic

## Responsible Official

Name: JAMES DUPREE

Title: DIRECTOR OF OPERATIONS

Phone: (724) 652 - 7777

### Permit Contact Person

Name: MARK HRITZ

Title: OPERATIONS MANAGER

Phone: (724) 652 - 7777

[Signature] _		_
NORTHWFS <sup>*</sup>	REGION AIR PROGRAM MANAGER	



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Note: These same sub-sections are repeated for each source!





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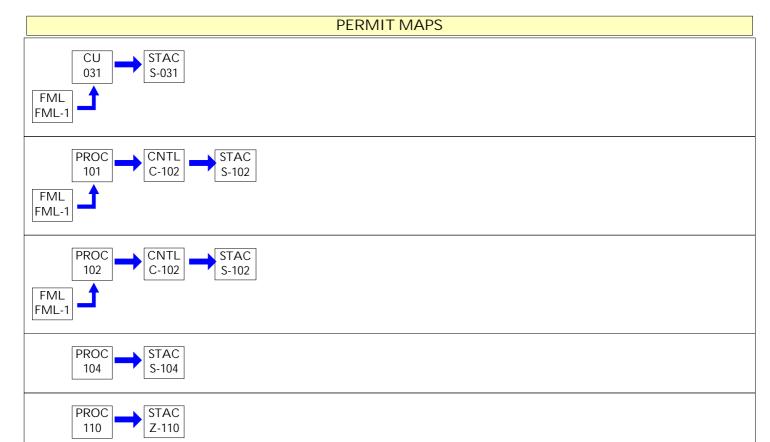
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# Section A. Site Inventory List

Source Name	Capacity/Throughput	Fuel/Material
SPACE HEATERS (NAT'L GAS)	1.20 MMBTU/HR	
	7.00 MCF/HR	Natural Gas
LITHO 4-COLOR PRINT LINE (P4) (W/OVEN)	2.40 MCF/HR	NATURAL GAS
	42.00 Lbs/HR	SOLVENT
	135.00 Lbs/HR	VOC
COATING LINE (W/ OVEN)	8.33 MCF/HR	Natural Gas
	85.00 Lbs/HR	SOLVENT
	371.00 Lbs/HR	VOC
U V PRESS (PRINT LINE #4)	3.00 Lbs/HR	SOLVENT
	3.00 Lbs/HR	VOC
PARTS CLEANING STATION (NOT HEATED)	0.10 Gal/HR	
REGENERATIVE THERMAL OXIDIZER		
NATURAL GAS PIPELINE		
STACK - SOURCE 031		
STACK - R.T.O.		
STACK - SOURCE 104		
FUGITIVES - SOURCE 110		
	SPACE HEATERS (NAT'L GAS)  LITHO 4-COLOR PRINT LINE (P4) (W/ OVEN)  COATING LINE (W/ OVEN)  U V PRESS (PRINT LINE #4)  PARTS CLEANING STATION (NOT HEATED)  REGENERATIVE THERMAL OXIDIZER  NATURAL GAS PIPELINE  STACK - SOURCE 031  STACK - R.T.O.  STACK - SOURCE 104	1.20 MMBTU/HR   7.00 MCF/HR   1.20 MCF/HR





## Section B. General Title V Requirements

#001 [25 Pa. Code § 121.1]

**Definitions** 

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.512(c)(4)]

**Property Rights** 

This permit does not convey property rights of any sort, or any exclusive privileges.

#003 [25 Pa. Code § 127.446(a) and (c)]

**Permit Expiration** 

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

### Permit Renewal

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.
- (c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#005 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

### Transfer of Ownership or Operational Control

- (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
  - (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.



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### Section B. General Title V Requirements

#006 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

## Inspection and Entry

- (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
  - (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

[25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)] #007

### **Compliance Requirements**

- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:
  - (1) Enforcement action
  - (2) Permit termination, revocation and reissuance or modification
  - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit. Nothing in this subcondition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

[25 Pa. Code § 127.512(c)(2)] #008

Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a 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 conditions of this permit.

#009 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to





### Section B. General Title V Requirements

determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

- (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
- (b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:
- (1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
- (2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
- (3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
- (d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#011 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#012 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.

#013 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

- (a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.



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#014 [25 Pa. Code § 127.450]

### Administrative Operating Permit Amendments

- (a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.
- (b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code § 127.512(b)]

### Severability Clause

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

[25 Pa. Code §§ 127.704, 127.705 & 127.707] #016

### Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [25 Pa. Code §§ 127.14(b) & 127.449]

## Authorization for De Minimis Emission Increases

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:
  - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.



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The Department may disapprove or condition de minimis emission increases at any time.

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquified petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the followina:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code §



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## Section B. General Title V Requirements

127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#018 [25 Pa. Code §§ 127.11a & 127.215]

### Reactivation of Sources

- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisifies the conditions specified in 25 Pa. Code § 127.11a(b).

#019 [25 Pa. Code §§ 121.9 & 127.216]

### Circumvention

- (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#020 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

### Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager PA Department of Environmental Protection (At the address given on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Enforcement and Permit Review (3AP10) United States Environmental Protection Agency Region 3 1650 Arch Street Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other





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certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

### Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#022 [25 Pa. Code §§ 127.511 & Chapter 135]

### Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

## Reporting Requirements

- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source.



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### Section B. General Title V Requirements

The required reports shall be certified by a responsible official.

- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

[25 Pa. Code § 127.513] #024

### Compliance Certification

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
  - (1) The identification of each term or condition of the permit that is the basis of the certification.
  - (2) The compliance status.
  - (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
  - (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance to the Department and EPA in accordance with the submission requirements specified in Condition #020 of this section.

#025 [25 Pa. Code § 127.3]

### Operational Flexibility

- (a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:
  - (1) Section 127.14 (relating to exemptions)
  - (2) Section 127.447 (relating to alternative operating scenarios)
  - (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
  - (4) Section 127.449 (relating to de minimis emission increases)
  - (5) Section 127.450 (relating to administrative operating permit amendments)
  - (6) Section 127.462 (relating to minor operating permit amendments)
  - (7) Subchapter H (relating to general plan approvals and operating permits)
- (b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shield authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

#026 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

### Risk Management

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release





## Section B. General Title V Requirements

program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
  - (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
  - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
  - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
  - (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)]

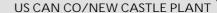
Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

### Permit Shield

- (a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:
  - (1) The applicable requirements are included and are specifically identified in this permit.







### Section B. General Title V Requirements

- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.
- (b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
  - (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
  - (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.
- (d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.





#### SECTION C. Site Level Requirements

### I. RESTRICTIONS.

### Emission Restriction(s).

# 001 [25 Pa. Code §123.1]

### Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
  - (4) Clearing of land.
  - (5) Stockpiling of materials.
- (6) Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

# 002 [25 Pa. Code §123.2]

### Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition #001, above, (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

# 003 [25 Pa. Code §123.31]

### Limitations

The permittee may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

# 004 [25 Pa. Code §123.41]

### Limitations

The permittee may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

# 005 [25 Pa. Code §123.42]

### Exceptions

The limitations of Condition #004, above, (relating to visible emission limitations) shall not apply to a visible emission in any of the following instances:

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.





### SECTION C. Site Level Requirements

(3) When the emission results from sources specified in Section C, Condition #001 of this permit.

# 006 [25 Pa. Code §127.12b]

### Plan approval terms and conditions.

The permittee shall not permit the emission of VOCs from this facility in excess of 49.4 tons in any twelve (12) month period. This twelve month rolling total shall be calculated by adding the VOC emissions for the current calender month to the VOC emissions for the previous eleven (11) calender months.

# 007 [25 Pa. Code §129.14]

### Open burning operations

- (a) The permittee may not permit the open burning of material.
- (b) Exceptions: This requirement does not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
  - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
  - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
  - (4) A fire set solely for recreational or ceremonial purposes.
  - (7) A fire set solely for cooking food.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.]

### II. TESTING REQUIREMENTS

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### III. MONITORING REQUIREMENTS.

# 008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall conduct weekly inspections of the area surrounding the plant to detect the presence of fugitive emissions and visible emissions. A log of these inspections shall be maintained and shall be made available to the Department upon request.
- b) Any fugitive emissions or visible emissions that are detected by plant personnel shall be reported to the Shift Supervisor. The Shift Supervisor shall record the event on the maintenance log. Appropriate corrective action shall be taken and noted in the maintenance log.

### IV. RECORDKEEPING REQUIREMENTS.

# 009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The facility shall maintain records sufficient to demonstrate compliance with source and facility VOC emission limitations and coating VOC content limitations. At a minimum, a facility shall maintain daily records of:

- a) The following parameters for each coating, thinner and other component as supplied:
  - i) The coating, thinner or component name and identification number.
  - ii) The volume used.
  - iii) The mix ratio.
  - iv) The density or specific gravity.







### SECTION C. Site Level Requirements

- v) The weight percent of total volatiles, water, solids and exempt solvents.
- vi) The volume percent of solids for Table I surface coating process categories 1-10.
- vii) The VOC content of each coating, thinner and other component as supplied.
- viii) The VOC content of each as applied coating.
- b) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and § 129.67 (relating to graphic arts systems). A surface coating process which seeks to comply with this section through the use of an exempt solvent may not be included in any alternative standards.

### [From Plan Approval Number 37248E, Condition #17.]

# 010 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall maintain records of monthly natural gas usage for the facility. For the purpose of AIMS (Air Information Management System) Reporting, the permittee may estimate the gas usage by each source, based on the hours of operation and the Btu rating.
- b) All inspection logs and maintenance reports mandated by this permit shall be retained for a period of five (5) years.
- c) All shipments of non-UV surface coatings arriving at this facility shall contain certifications of the VOC content of each coating. The certification must ensure that the VOC content was determined in accordance with 40 CFR 60, Appendix A -Reference Method 24. The permittee shall retain these certifications for a period of five (5) years in order to demonstrate compliance.
- The VOC content of each UV-curable coating used by the facility will be calculated upon initial use and any formulation modification, using ASTMD 5403-93, processing volatiles.

# 011 [25 Pa. Code §135.5]

### Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

### REPORTING REQUIREMENTS.

# 012 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall report VOC emissions on a annual basis for each of the three production lines, and for the facility as a whole. The report shall contain the VOC emissions for each month in the reporting period and a twelve month rolling total for each month, which is calculated by adding each months emissions to the emissions for the eleven (11) prior calender months.

# 013 [25 Pa. Code §135.21]

### **Emission statements**

- (a) Except as provided in subsection (d), this section applies to stationary sources or facilities:
- (1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious, severe or extreme ozone nonattainment area and which emit oxides of nitrogen or VOC.
- (2) Not located in an area described in subparagraph (1) and included in the Northeast Ozone Transport Region which emit or have the potential to emit 100 tons or more oxides of nitrogen or 50 tons or more of VOC per year.







#### SECTION C. Site Level Requirements

- (b) The owner or operator of each stationary source emitting oxides of nitrogen or VOC's shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.
- (c) Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993, for calendar year 1992 and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M. Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:
  - (1) A more frequent submission is required by the EPA.
  - (2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.
- (d) Subsection (a) does not apply to a class or category of stationary sources which emits less than 25 tons per year of VOC's or oxides of nitrogen, if the Department in its submissions to the Administrator of the EPA under section 182(a)(1) or (3)(B)(ii) of the Clean Air Act (42 U.S.C.A. 7511a(a)(1) or (3)(B)(ii)) provides an inventory of emissions from the class or category of sources based on the use of the emission factors established by the Administrator or other methods acceptable to the Administrator. The Department will publish in the Pennsylvania Bulletin a notice of the lists of classes or categories of sources which are exempt from the emission statement requirement under this subsection.

### # 014 [25 Pa. Code §135.3]

### Reporting

- (a) The Permittee shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.
- (b) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

# 015 [25 Pa. Code §135.4]

### Report format

All source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

### WORK PRACTICE STANDARDS.

# 016 [25 Pa. Code §123.1]

### Prohibition of certain fugitive emissions

A person responsible for any source specified in Section C - Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
  - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.





## SECTION C. Site Level Requirements

### VII. ADDITIONAL REQUIREMENTS.

# 017 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain all process heaters and combustion units according to the manufacturer's recommendations.

## VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit on or before 10/30/2003 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

\*\*\* Permit Shield In Effect \*\*



Permit Number: 37-00248 US CAN CO/NEW CASTLE PLANT

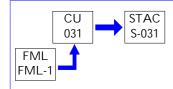


#### SECTION D. Source Level Requirements

Source Name: SPACE HEATERS (NAT'L GAS) Source ID: 031

> Source Capacity/Throughput: 1.20 MMBTU/HR

> > 7.00 MCF/HR Natural Gas



### RESTRICTIONS.

### Emission Restriction(s).

# 001 [25 Pa. Code §123.11]

### Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from this combustion unit at a rate in excess of 0.4 pound per million Btu of heat input.

# 002 [25 Pa. Code §123.22]

### Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

### Fuel Restriction(s).

# 003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

All combustion sources and process heaters at this facility shall operate using only natural gas as a fuel.

#### ш **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

\*\*\* Permit Shield in Effect. \*\*\*



## US CAN CO/NEW CASTLE PLANT

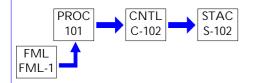


#### SECTION D Source Level Requirements

Source Name: LITHO 4-COLOR PRINT LINE (P4) (W/OVEN) Source ID: 101

> Source Capacity/Throughput: 2.40 MCF/HR NATURAL GAS

> > 42.00 Lbs/HR **SOLVENT** 135.00 Lbs/HR VOC



### RESTRICTIONS.

### Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

**Processes** 

No person may permit the emission into the outdoor atmosphere of particulate matter from this process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

# 003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The combined VOC emissions from Source IDs: 101 and 102 shall not exceed 35.54 tons in any consecutive twelve (12) month period. The twelve (12) month rolling total shall be calculated by adding the VOC emissions for the current calendar month to the VOC emissions for the previous eleven (11) calendar month.

[From Plan Approval Number 37248E, Condition #6.]

## Fuel Restriction(s).

# 004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

This source shall operate using only natural gas as a fuel.

#### **TESTING REQUIREMENTS.** П.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

#### MONITORING REQUIREMENTS. III.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a) The permittee shall maintain temperature sensing devices to measure and record the temperature, in degrees Fahrenheit, within the combustion chamber of the RTO. The temperature sensing device shall be accurate to within +/- 10 degrees Fahrenheit.
- The permittee shall monitor and record the velocity of the airflow entering the PTE on a weekly basis.

[Additional authority for these permit conditions is also derived from 40 CFR Sub-sections 64.3 and 64.6.]



## US CAN CO/NEW CASTLE PLANT



### SECTION D Source Level Requirements

#### IV. RECORDKEEPING REQUIREMENTS.

# 006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Records shall be maintained of RTO inspections and maintenance performed. The records shall be maintained onsite for a minimum of five years, and shall be made available to the Department upon request.

[From Plan Approval Number 37248E, Condition #15.]

- Coatings used at sources 101 & 102 shall be formulated in accordance with limitations defined by 25 Pa Code §129.52(b) -
- (2). For each coating used at the coating lines, the permittee shall determine the "overall control efficiency" in overall weight of VOCs by using the following equation:

$$O = (1 - E/V) \times 100$$

Where:

- V = The VOC content of the as applied coating, in lb VOC/gal of coating solids or lb VOC/lb of coating solids.
- E = Table I limit in lb VOC/gal of coating solids or lb VOC/lb of coating solids.
- O = Overall control efficiency.

No coatings with a calculated overall control efficiency greater than 97% shall be used.

### [From Plan Approval Number 37248E, Condition #16.]

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- The permittee shall record the temperatures within the combustion chamber of the RTO on a continuous basis. The minimum chart recorded sensitivity is 20 degrees Fahrenheit.
- The permittee shall record the results of all annual internal inspections and monthly observations of the RTO and b) associated equipment. This report shall include all repairs and maintenance performed on the control and monitoring equipment.
- The permittee shall record all excursions and corrective actions taken in response to an excursions and the time elapsed until the corrective actions have been taken.
- The permittee shall record the results of the weekly inspections of the self-closing doors of the PTE. d)
- The permittee shall record the results of the weekly air velocity readings for the PTE.

An excursion is defined as failure to complete weekly air velocity readings.

The permittee shall maintain for a period of five (5) years all continuous, daily, monthly, and annual records required by this permit. All records shall be made available to the Department upon request.

[Additional authority for these permit conditions is derived from 40 CFR 64.9.]

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### VI. WORK PRACTICE STANDARDS.

# 008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

This source shall be enclosed with a permanent total enclosure (PTE), as defined in US EPA Method 204.

[From Plan Approval Number 37248E, Condition #4.]

The permanent total enclosure around sources 101 & 102 shall be designed in accordance with criteria defined in US EPA Method 204 to achieve 100% capture of VOC emissions. Method 204 criteria includes, but is not limited to the following:



### ECTION D. Source Level Requirements

- 1) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
  - 2) Any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each NDO.
  - 3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- 4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
- 5) All access doors and windows whose areas are not included in section 5.3 and are not included in the calculation in section 5.4 shall be closed during routine operation of the process.

[From Plan Approval Number 37248E, Condition #9.]

The RTO shall be operated at all times Source ID: 101 or 102 are in operation.

[From Plan Approval Number 37248E, Condition #10.]

The RTO shall maintain a minimum of 97% reduction of VOC emissions at all times.

[From Plan Approval Number 37248E, Condition #11.]

The RTO combustion chamber temperature shall be maintained at a minimum 1500 Degrees Fahrenheit, or at a minimum temperature established during compliant stack testing, during all periods of operation.

[From Plan Approval Number 37248E, Condition #12.]

Temperature sensing and recording devices shall be maintained to measure and record the temperature in the combustion chamber of the RTO. Combustion chamber temperatures shall be recorded at all times the control device is operating.

[From Plan Approval Number 37248E, Condition #13.]

In accordance with the Plan Approval application, US Can shall inspect the following RTO components on a monthly basis, and perform maintenance as needed:

Fan

Motors

Valves

**Dampers** 

Pneumatic actuators

Air dryer

Filter indicators

Check for erratic operations

Duct work joints

[From Plan Approval Number 37248E, Condition #14.]

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

a) An excursion, from the required temperature range, is defined as any time when the chamber temperature is below 1500 degrees Fahrenheit, while either Source ID: 101 or 102 is operating.

Each excursion triggers an inspection, corrective action, and a reporting requirement.

b) The permittee shall validate the accuracy of temperature sensing and recording devices on an annual basis, according to the manufacturer's recommended procedures.



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### ECTION D. Source Level Requirements

The permit shall perform annual internal inspections and monthly external observations of the RTO to ensure proper operation.

An excursion is defined as failure to complete any of the required inspections or observations.

- The permittee shall maintain self-closing doors on the PTE. The doors are to remain closed during all periods of operation.
- The permittee shall perform weekly inspections to ensure the self closing doors on the PTE are operational.

[Additional authority for these permit conditions is also derived from 40 CFR Sub-sections 64.3 and 64.6.]

### ADDITIONAL REQUIREMENTS.

# 010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Reporting and Recordkeeping Requirements for the CAM plan are defined in 40 CFR Part 64 §64.9. Reporting requirements include, but are not limited to:

- a) General reporting requirements
- i) On and after the date specified in §64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with §70.6(a)(3)(iii) of this chapter.
- ii) A report for monitoring under this part shall include, at a minimum, the information required under §70.6(a)(3)(iii) of this chapter and the following information, as applicable:
- iii) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- iv) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- v) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
- b) Recordkeeping will be done in accordance with 40 CFR Part 64, §64.9.

## \*\*\* Permit Shield in Effect. \*\*\*



### US CAN CO/NEW CASTLE PLANT

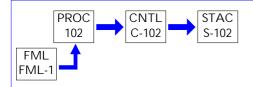


#### SECTION D. Source Level Requirements

Source Name: COATING LINE (W/ OVEN) Source ID: 102

> Source Capacity/Throughput: 8.33 MCF/HR Natural Gas

> > 85.00 Lbs/HR **SOLVENT** 371.00 Lbs/HR VOC



### RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

**Processes** 

No person may permit the emission into the outdoor atmosphere of particulate matter from this process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

# 003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The combined VOC emissions from Source IDs: 101 and 102 shall not exceed 35.54 tons in any consecutive twelve (12) month period. The twelve (12) month rolling total shall be calculated by adding the VOC emissions for the current calendar month to the VOC emissions for the previous eleven (11) calendar month.

### [From Plan Approval Number 37248E, Condition #6.]

# 004 [25 Pa. Code §129.52]

Surface coating processes

- (a) This section applies to all surface coating processes, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 (2,455 kilograms) tons per year during any calendar year since January 1, 1987.
- (b) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a surface coating process category listed in Table I, unless one of the following limitations is met:
  - (1) [Does not apply]
- (2) The overall weight of VOCs emitted to the atmosphere is reduced through the use of vapor recovery or incineration or another method which is acceptable under 129.51(a) (relating to general). The overall efficiency of a control system, as determined by the test methods and procedures specified in Chapter 139 shall be no less then the equivalent overall efficiency calculated by the following equation:

$$O = (1 - E / V) \times 100$$

Where:

- V = The VOC content of the as applied coating, in lb VOC/gal of coating solids.
- E = Table I limit in lb VOC/gal of coating solids or lb VOC/lb of coating solids.
- O = Overall control efficiency.
  - (c) [See Recordkeeping Requirements]



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#### ECTION D. Source Level Requirements

- (d) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and 129.67 (relating to graphic arts systems). A surface coating process which seeks to comply with this section through the use of an exempt solvent may not be included in any alternative standards.
  - (e) [Does not apply]
  - (f) [Does not apply]
- (g) The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.
- (h) The VOC standards in Table I do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following critieria:
- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

### Fuel Restriction(s).

# 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

This source shall operate using only natural gas as a fuel.

#### ш **TESTING REQUIREMENTS.**

# 006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall perfom stack tests at least once every five (5) years to demonstrate compliance with the VOC reduction requirements specified for this source.
- b) All testing shall be performed in accordance with the provisions of 25 Pa Code, Chapter 139 (relating to Sampling and Testing).
- c) All stack tests shall be performed while the source is operating at the maximum rated capacity as stated in the application.
- d) All test procedures shall have prior approval of the Department.

#### MONITORING REQUIREMENTS. III.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- The permittee shall maintain temperature sensing devices to measure and record the temperature, in degrees Fahrenheit, within the combustion chamber of the RTO. The temperature sensing device shall be accurate to within +/- 10 degrees Fahrenheit.
- The permittee shall monitor and record the velocity of the airflow entering the PTE on a weekly basis.

[Additional authority for these permit conditions is also derived from 40 CFR Sub-sections 64.3 and 64.6.]

#### IV. RECORDKEEPING REQUIREMENTS.

# 008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Records shall be maintained of RTO inspections and maintenance performed. The records shall be maintained onsite for a minimum of five years, and shall be made available to the Department upon request.



ECTION D

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## US CAN CO/NEW CASTLE PLANT



# [From Plan Approval Number 37248E, Condition #15.]

Source Level Requirements

Coatings used at sources 101 & 102 shall be formulated in accordance with limitations defined by 25 Pa Code §129.52(b) -

(2). For each coating used at the coating lines, the permittee shall determine the "overall control efficiency" in overall weight of VOCs by using the following equation:

$$O = (1 - E/V) \times 100$$

Where:

V = The VOC content of the as applied coating, in lb VOC/gal of coating solids or lb VOC/lb of coating solids.

E = Table I limit in lb VOC/gal of coating solids or lb VOC/lb of coating solids.

O = Overall control efficiency.

No coatings with a calculated overall control efficiency greater than 97% shall be used.

### [From Plan Approval Number 37248E, Condition #16.]

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a) The permittee shall record the temperatures within the combustion chamber of the RTO on a continuous basis. The minimum chart recorded sensitivity is 20 degrees Fahrenheit.
- The permittee shall record the results of all annual internal inspections and monthly observations of the RTO and b) associated equipment. This report shall include all repairs and maintenance performed on the control and monitoring equipment.
- The permittee shall record all excursions and corrective actions taken in response to an excursions and the time elapsed until the corrective actions have been taken.
- d) The permittee shall record the results of the weekly inspections of the self-closing doors of the PTE.
- The permittee shall record the results of the weekly air velocity readings for the PTE.

An excursion is defined as failure to complete weekly air velocity readings.

The permittee shall maintain for a period of five (5) years all continuous, daily, monthly, and annual records required by this permit. All records shall be made available to the Department upon request.

### [Additional authority for these permit conditions is derived from 40 CFR 64.9.]

# 010 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Daily records of coating and solvent usage shall be used to calculate emissions on a monthly basis. Twelve month rolling totals shall be calculated and recorded to show compliance with source and facility wide VOC emission limitations.

### # 011 [25 Pa. Code §129.52]

### Surface coating processes

A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:

- (1) The following parameters for each coating, thinner and other component as supplied:
- (i) The coating, thinner or component name and identification number.
- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.



### ECTION D. Source Level Requirements

- (v) The weight percent of solids for Table I surface coating process categories 1 10.
- (2) The VOC content of each coating, thinner and other component as supplied.
- (3) The VOC content of each as applied coating.

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### VI. WORK PRACTICE STANDARDS.

# 012 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

This source shall be enclosed with a permanent total enclosure (PTE), as defined in US EPA Method 204.

[From Plan Approval Number 37248E, Condition #4.]

- The permanent total enclosure around sources 101 & 102 shall be designed in accordance with criteria defined in US EPA Method 204 to achieve 100% capture of VOC emissions. Method 204 criteria includes, but is not limited to the following:
- 1) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
  - 2) Any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each NDO.
  - 3) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- 4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
- 5) All access doors and windows whose areas are not included in section 5.3 and are not included in the calculation in section 5.4 shall be closed during routine operation of the process.

[From Plan Approval Number 37248E, Condition #9.]

The RTO shall be operated at all times Source ID: 101 or 102 are in operation.

[From Plan Approval Number 37248E, Condition #10.]

The RTO shall maintain a minimum of 97% reduction of VOC emissions at all times.

[From Plan Approval Number 37248E, Condition #11.]

The RTO combustion chamber temperature shall be maintained at a minimum 1500 Degrees Fahrenheit, or at a minimum temperature established during compliant stack testing, during all periods of operation.

[From Plan Approval Number 37248E, Condition #12.]

Temperature sensing and recording devices shall be maintained to measure and record the temperature in the combustion chamber of the RTO. Combustion chamber temperatures shall be recorded at all times the control device is operating.

[From Plan Approval Number 37248E, Condition #13.]

In accordance with the Plan Approval application, US Can shall inspect the following RTO components on a monthly basis, and perform maintenance as needed:

Fan



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#### ECTION D. Source Level Requirements

Motors

Valves

**Dampers** 

Pneumatic actuators

Air dryer

Filter indicators

Check for erratic operations

Duct work joints

[From Plan Approval Number 37248E, Condition #14.]

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

An excursion, from the required temperature range, is defined as any time when the chamber temperature is below 1500 degrees Fahrenheit, while either Source ID: 101 or 102 is operating.

Each excursion triggers an inspection, corrective action, and a reporting requirement.

- The permittee shall validate the accuracy of temperature sensing and recording devices on an annual basis, according to the manufacturer's recommended procedures.
- The permit shall perform annual internal inspections and monthly external observations of the RTO to ensure proper operation.

An excursion is defined as failure to complete any of the required inspections or observations.

- d) The permittee shall maintain self-closing doors on the PTE. The doors are to remain closed during all periods of operation.
- The permittee shall perform weekly inspections to ensure the self closing doors on the PTE are operational.

[Additional authority for these permit conditions is also derived from 40 CFR Sub-sections 64.3 and 64.6.]

### ADDITIONAL REQUIREMENTS.

# 014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Reporting and Recordkeeping Requirements for the CAM plan are defined in 40 CFR Part 64 §64.9. Reporting requirements include, but are not limited to:

- a) General reporting requirements
- i) On and after the date specified in §64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with §70.6(a)(3)(iii) of this chapter.
- ii) A report for monitoring under this part shall include, at a minimum, the information required under §70.6(a)(3)(iii) of this chapter and the following information, as applicable:
- iii) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- iv) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- v) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.



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### SECTION D. Source Level Requirements

b) Recordkeeping will be done in accordance with 40 CFR Part 64, §64.9.

\*\*\* Permit Shield in Effect. \*\*\*

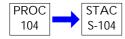


#### SECTION D Source Level Requirements

Source Name: U V PRESS (PRINT LINE #4) Source ID: 104

> Source Capacity/Throughput: 3.00 Lbs/HR **SOLVENT**

3.00 Lbs/HR VOC



### RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The VOC emissions from this source shall not exceed 12.76 tons in any consecutive twelve (12) month period. this twelve (12) month rolling period shall be calculated by adding the VOC emissions for the current calendar month to the VOC emissions for the previous eleven (11) calendar months.

[From Plan Approval Number 37248E, Condition #7.]

### Throughput Restriction(s).

# 002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

UV coatings shall be the only approved coatings to be used at this source.

[From Plan Approval Number 37248D, Condition #7.]

#### П. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

\*\*\* Permit Shield in Effect. \*\*\*



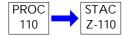
### US CAN CO/NEW CASTLE PLANT



#### ECTION D Source Level Requirements

Source Name: PARTS CLEANING STATION (NOT HEATED) Source ID: 110

> Source Capacity/Throughput: 0.10 Gal/HR



### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

#### П. **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

### VI. WORK PRACTICE STANDARDS.

# 001 [25 Pa. Code §129.63]

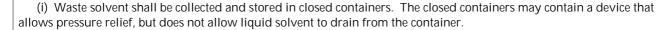
### Degreasing operations

- (a) Cold cleaning machines. Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.
  - (1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.
  - (2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:
- (i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:
- (A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
- (B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
  - (C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.
  - (3) Cold cleaning machines shall be operated in accordance with the following procedures:



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#### ECTION D. Source Level Requirements



- (ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
  - (iv) Air agitated solvent baths may not be used.
  - (v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.
- (4) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.
- (5) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:
  - (i) The name and address of the solvent supplier.
  - (ii) The type of solvent including the product or vendor identification number.
- (iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).
- (6) A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (5). An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.
  - (7) Paragraph (4) does not apply:
  - (i) To cold cleaning machines used in extreme cleaning service.
- (ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (4) will result in unsafe operating conditions.
  - (iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

\*\*\* Permit Shield in Effect. \*\*\*



# US CAN CO/NEW CASTLE PLANT



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.



# US CAN CO/NEW CASTLE PLANT

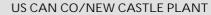


# SECTION F. Emission Restriction Summary.

Dep Id	Source Description		
031	SPACE HEATERS (NAT'L G	AS)	
	Emission Limit		Pollutant
	0.400 Lbs/MN	1BTU	P000
101	LITHO 4-COLOR PRINT LII	NE (P4) (W/ OVEN)	
	Emission Limit		Pollutant
	0.040 gr/DRY	FT3	P000
	500.000 PPMV		SOX
	35.540 Tons/Yi	Source IDs: 101 & 102 combined	VOC
102	COATING LINE (W/ OVEN	)	
	Emission Limit		Pollutant
	0.040 gr/DRY	FT3	P000
	500.000 PPMV		SOX
	35.540 Tons/Yi	Source IDs: 101 & 102 combined	VOC
104	U V PRESS (PRINT LINE #4		
	Emission Limit		Pollutant
	12.760 Tons/Yi	12 month rolling total	VOC

Site Emission Restriction Summary

Emission Limit	Pollutant
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## SECTION G. Miscellaneous.

The source capacities listed in this permit are for informational purposes only and do not represent regulatory limits.

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This permit was administratively amended to incorporate changes brought about by Plan Approval Numbers 37-0248D and 37-0248E.



\*\*\*\*\* End of Report \*\*\*\*\*