



09/11/2026

Edward Harhager
Sonoco Metal Packaging, LLC.
3075 BROOKLINE ROAD, N.W.
North Canton, OH 44720

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677000223
Permit Number: P0140560
Permit Type: Initial Installation
County: Summit

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search | Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Akron Regional Air Quality Management
District
1867 West Market St.
Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
ARAQMD; Pennsylvania; West Virginia; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation

Sonoco Metal Packaging, LLC.
3075 BROOKLINE ROAD, N.W.
North Canton, OH 44720

ID#: P0140560

Date of Action: 09/11/2026

Permit Desc: FEPTIO for two end liner lines.

The permit and complete instructions for requesting information or submitting comments may be obtained at:
<https://ohioepa.commentinput.com> - Search by entering the permit # in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

Sonoco Metal Packaging, LLC (Sonoco) is an existing facility located in North Canton, Ohio that manufactures two and three-piece metal can ends for packaging purposes in various industries. The facility consists of eight conversion presses (K007, K009, K011, K015, K017, K019, K026, and K029), ten blanked end liners (K001, K006, K008, K010, K016, K018, K025, K028, K032, and K033), four post-repair stations (K020, K021, K022, and K027), ECoater (K024), and several permit exempt sources. This permit is for two end liners (K034 and K035) that were previously permit exempt under OAC rule 3745-15-05.

3. Facility Emissions and Attainment Status:

The facility emissions are currently limited to 98.15 tons per year for volatile organic compounds (VOC), 9.0 tons per year for any individual hazardous air pollutants (HAP), and 24.0 tons per year for combined HAPS. Summit County is currently in attainment for all criteria pollutants.

4. Source Emissions:

The potential to emit for VOC emissions for the two blanked end liners combined is 0.44 tons per year. Sonoco has requested to limit the VOC, any individual HAP, and combined HAPS emissions for the entire facility including permit exempt sources to 99.0 tons per year, 9.0 tons per year, and 24.0 tons per year, respectively.

5. Conclusion:

The facility will continue maintaining records of the materials employed in the above-mentioned emissions units, along with the VOC and HAPs contents of the materials employed to verify compliance with the abovementioned limitations. This facility will not be considered a major source for Title V and 40 CFR Part 63, Subpart KKKK, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.0
Any individual HAP	9.0
Combined HAPs	24.0



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Sonoco Metal Packaging, LLC.

Facility ID:	1677000223
Permit Number:	P0140560
Permit Type:	Initial Installation
Issued:	09/11/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Sonoco Metal Packaging, LLC.

Table of Contents

Authorization.....	6
List of Commonly Used Abbreviations	8
A. Standard Terms and Conditions.....	9
B. Facility-Wide Terms and Conditions.....	14
C. Emissions Unit Terms and Conditions	20
1. Emissions Unit Group - Group 11: K034.....	21
2. Emissions Unit Group - Group 12: K035.....	24



Permit Number: P0140560
Facility Name: Sonoco Metal Packaging, LLC.
Facility ID: 1677000223
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1677000223
Application Number(s): A0081899A0081899
Permit Number: P0140560
Permit Description: FEPTIO for two end liner lines.
Permit Type: Initial Installation
Permit Fee: \$450.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 09/11/2026
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report
(PER) Annual Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

Sonoco Metal Packaging, LLC.
3075 BROOKLINE ROAD, N.W.
North Canton, OH 44720

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director



Permit Number: P0140560
Facility Name: Sonoco Metal Packaging, LLC.
Facility ID: 1677000223
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number:P0140560

Permit Description:FEPTIO for two end liner lines.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name:Group 11

Emissions Unit ID:	K034
Company Equipment ID:	Multi Die Line 21
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name:Group 12

Emissions Unit ID:	K035
Company Equipment ID:	Multi Die Line 22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- a) PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Environmental
Protection
Agency**

Permit Number: P0140560

Facility Name: Sonoco Metal Packaging, LLC.

Facility ID: 1677000223

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

- a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4., and 5.

2. Facility-Wide Emissions Limitations

The emissions of any individual hazardous air pollutant (HAP), total combined HAPs, and volatile organic compounds (VOC) shall not exceed 9.0 tons per year, 24.0 tons per year, and 99.0 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates for the entire facility*.

**Includes emissions units that are permit exempt under OAC rule 3745-15-05 or OAC rule 3745-31-03.*

3. Monitoring and/or Recordkeeping Requirements

- a) The facility shall maintain documentation of the potential to emit for the VOC emission, each individual HAP emissions, and the total combined HAP emissions for all the permit exempt sources not included in the recordkeeping in 3.b) and 3.c) below. The documentation shall contain detailed calculations, verification of the “worst-case” scenario, and a summary of the total potential to emit for the VOC emissions, each individual HAP, and the total combined HAPs from all permit exempt sources combined, in ton(s) per year.
- b) The permittee shall collect and record the following information in a “master materials list” which is periodically updated for all materials containing VOC and/or any HAP¹ to be used in the emissions calculations in 3.c) below:
 - (1) The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing VOC and/or any HAP;
 - (2) The name/identification of each individual HAP contained in each material applied (and identified in “a” above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - (3) The total combined HAP content of each HAP containing material applied (and identified in “a” above), in pound(s) of combined HAPs per gallon of each HAP-containing material applied;
 - (4) The VOC content of each VOC containing material applied (and identified in “a” above), in pound(s) of VOC per gallon of each VOC containing material applied; and
 - (5) The date the “master materials list” was last updated and the name of the person who updated the “master materials list”.
- c) The permittee shall maintain the following monthly records:
 - (1) For emissions units K001, K006, K007, K008, K009, K010, K011, K015, K016, K017, K018, K019, K026, K029, K032, K033, K034, and K035, the permittee shall collect and record the following



information each month for all materials containing any HAP¹ and/or VOC that are employed in each uncontrolled emissions unit:

- a. The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material employed during the month;
- b. The number of gallons of each coating, thinner, additive, cleanup material, and other material employed during the month;
- c. The VOC emissions from all the materials employed during the month, in pounds or tons for each emissions unit;
- d. For each individual HAP, the total emissions from all the materials employed during the month, in pounds or tons for each emissions unit; and
- e. The total combined HAPs emissions from all the materials employed during the month, in pounds or tons for each emissions unit, i.e., the summation of all the individual HAP emissions from "d" above.

(2) For emissions units K020, K021, K022, K027, and K030, the permittee shall collect and record the following information each month for all materials containing any HAP¹ and/or VOC that are employed in each controlled emissions unit:

- a. The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material employed during the month;
- b. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
- c. The uncontrolled VOC emissions from all the materials employed during the month, in pounds or tons for each emissions unit;
- d. For each individual HAP, the total uncontrolled emissions from all the materials employed during the month, in pounds or tons for each emissions unit;
- e. The total uncontrolled combined HAPs emissions from all the materials employed during the month for each emissions unit, in pounds or tons, i.e., the summation of all the individual HAP emissions from "d" above;
- f. The calculated, controlled VOC emission rate for all the materials employed during the month, in pounds or tons for each emissions unit, i.e., the uncontrolled VOC emission rate, calculated in "c" above, multiplied by the result of one minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;
- g. For each individual HAP, the calculated, controlled emission rate from all the materials employed during the month, in pounds or tons for each emissions unit, i.e., the total uncontrolled individual HAP emission rate calculated in "d" above, multiplied by the result of one minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance; and



Effective Date: To be entered upon final issuance

- **Includes the potential to emit for the VOC emissions, any individual HAP emissions, and the total combined HAPs emissions from all the permit exempt sources not included in the recordkeeping in 3.b) – 3.c) above.*

- a) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - (1) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - a. All exceedances of the rolling, 12-month VOC emission limitation for the entire facility.
 - b. All exceedances of the rolling, 12-month individual HAP emission limitation for the entire facility.
 - c. All exceedances of the rolling, 12-month total combined HAPs emission limitation for the entire facility.



- (2) The probable cause of each deviation (excursion).
- (3) Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- (4) The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

5. **Testing Requirements**

- a) Compliance with the emission limitations in 2. above shall be determined in accordance with the following method(s):

- (1) Emissions Limitations:

The emissions of any individual HAP, total combined HAPs, and VOC shall not exceed 9.0 tons per year, 24.0 tons per year, and 99.0 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates for the entire facility including permit exempt sources.

Applicable Compliance Method:

Compliance with the annual emission limitations above shall be demonstrated based upon the recordkeeping requirements established in 3.a), 3.b) and 3.c) above.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings, thinner, additive, cleanup material, and any other material containing any VOC. Formulation data shall be used to determine the HAP contents of the coating, thinner, additive, cleanup material, and any other material containing any HAP.

- b) The permittee shall conduct, or have conducted, emission testing for the controlled emissions units (K020, K021, K022, K027, and K030) and the regenerative thermal oxidizer (RTO) in accordance with the following requirements:
 - (1) The emission testing shall be conducted within 6 months prior to the permit expiration.
 - (2) The emission testing shall be conducted to demonstrate compliance with the overall control efficiency and the control efficiency limitations for VOC.
 - (3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency per U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (Ohio EPA will consider the request, including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement).



- (4) The control efficiency (that is, the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined per the test methods and procedures specified in OAC rule 3745-21-10 or an alternative test protocol approved by Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and the total concentration, and on a consideration of the potential presence of interfering gases.
- (5) During the emissions testing, the emissions unit (EU) shall be operated under operational conditions approved in advance by the appropriate Ohio EPA DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.) or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under worst case conditions expected during the life of the permit. As part of the information provided in the Intent to Test (ITT) notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe worst case operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute worst case. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- (6) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an ITT notification to the appropriate Ohio EPA DO/LAA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU operating parameters, the time(s) and date(s) of the test(s) and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA DO/LAA's refusal to accept the results of the emission test(s).
- (7) Personnel from the appropriate Ohio EPA DO/LAA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.
- (8) A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA DO/LAA.



**Environmental
Protection
Agency**

Permit Number: P0140560

Facility Name: Sonoco Metal Packaging, LLC.

Facility ID: 1677000223

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Group 11: K034

EU ID	Operations, Property and/or Equipment Description
K034	End Liner Line 21

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e. and d)(2).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart KKKK)	See Facility-Wide Terms and Conditions B.2 through B.5 above.
c.	OAC rule 3745-17-11(A)(1)(j)	Surface coating processes (e.g., for sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) application methods are exempt from the requirements of OAC rule 3745-17-11.
d.	OAC rule 3745-21-09(D)(1)(e) or (D)(2)(e)	The permittee shall not use coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.
e.	OAC rule 3745-114-01 ORC 3704.03(F)(4)	See d)(2) below.



(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. The name and identification number of each coating, as applied.

b. The mass of VOC per volume (pounds per gallon) of each coating, excluding water and exempt solvents, as applied.

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

(2) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EUs'* maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY, may require the permittee to apply for and obtain a new FEPTIO.

**Combined potential emissions from K034 and K035.*

e) Reporting Requirements

(1) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA DO/LAA within 30 days following the end of the calendar month.

(2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(3) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification, or report is considered *submitted* on the date



the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not use coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be demonstrated based on the recordkeeping requirements established in d)(1) above and the test methods and procedures specified in OAC rule 3745-21-10(B).

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Group 12: K035

EU ID	Operations, Property and/or Equipment Description
K035	End Liner Line 22

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. b)(1)e. and d)(2).
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31 05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V permitting and MACT applicability under 40 CFR Part 63, Subpart KKKK)	See Facility-Wide Terms and Conditions B.2 through B.5 above.
c.	OAC rule 3745-17-11(A)(1)(j)	Surface coating processes (e.g., for sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) application methods are exempt from the requirements of OAC rule 3745-17-11.
d.	OAC rule 3745-21-09(D)(1)(e) or (D)(2)(e)	The permittee shall not use coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.
e.	OAC rule 3745-114-01 ORC 3704.03(F)(4)	See d)(2) below.

- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
 - a. The name and identification number of each coating, as applied.
 - b. The mass of VOC per volume (pounds per gallon) of each coating, excluding water and exempt solvents, as applied.

This information does not have to be kept on a line-by-line basis. If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.
 - (2) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EUs'* maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a *modification* as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1 TPY, may require the permittee to apply for and obtain a new FEPTIO.

**Combined potential emissions from K034 and K035.*
- e) Reporting Requirements
 - (1) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA DO/LAA within 30 days following the end of the calendar month.
 - (2) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification, or report is considered *submitted* on the date



the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not use coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be demonstrated based on the recordkeeping requirements established in d)(1) above and the test methods and procedures specified in OAC rule 3745-21-10(B).

g) Miscellaneous Requirements

- (1) None.