

A. Applicable Emission Limitations and/or Control Requirements

1. For pounds/day emissions limitation for emissions unit K051 see the Air Emissions Summary page of this permit.
2. The permittee shall not employ coatings in emissions unit K051 with a VOC content greater than 6.1 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
3. The permittee shall not employ cleanup materials in emissions unit K051 with a VOC content greater than 7.5 pounds of VOC/gallon, as applied.
4. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed the following: 80,300 gallons of coating per year and 7,300 gallons of cleanup material per year, based upon a rolling, 12-month summation of the coating and cleanup material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating and cleanup material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>	<u>Maximum Allowable Cumulative Cleanup Material Usage</u>
1-2	40,150	3650
1-3	40,150	3650
1-4	40,150	3650
1-5	40,150	3650
1-6	40,150	3650
1-7	46,841.6	4258.3
1-8	53,533.2	4866.6
1-9	60,224.8	5474.9
1-10	66,916.4	6083.2
1-11	73,608.0	6691.5
1-12	80,300	7300.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the monthly usages.

5. This emissions unit shall be equipped with a permanent total enclosure system with 100% capture, in accordance with Appendix M-Part 51-Method 204 and a thermal oxidizer with a minimum 95% VOC (Volatile Organic Compound) destruction efficiency thus giving an overall control efficiency of 95%.

B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following

information for each day for the control equipment:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall collect and record the following information on a monthly basis:
- a. The name and identification number of each coating, as applied;
 - b. The VOC content of each coating in pounds per gallon, as applied;
 - c. The amount of each coating, in gallons, employed;
 - d. The name and identification of each cleanup material employed;

- e. The number of gallons of each cleanup material employed;
- f. The VOC content of each cleanup material, in pounds per gallon, as applied;
- g. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
- h. The total VOC emissions; and,
- i. Beginning after the first 12 calendar months of operation following issuance of the permit, the rolling, 12-month summation of coating and cleanup material usage figures.

Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage for each calendar month.

- 4. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created, unless otherwise specified in this permit. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in T&C B.1.

2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in T&C B.2.
3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month coating and cleanup material usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating and cleanup material usage limitation.
5. The permittee shall submit required reports in the following manner:
 - a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

The reports shall be submitted quarterly i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Compliance Methods/Testing Requirements

1. The permittee shall calculate the controlled VOC emission rate by multiplying the VOC content by the coating and/or cleanup material usage rate then by the control efficiency.
2. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the control efficiency of not less than 95% and a capture efficiency of not less than 100% by weight of all VOC emissions entering the control device.
 - c. The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for the allowable mass emission rate are specified below.

The capture efficiency shall be determined using Methods 204 through 204F as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol approved on 10/25/95". The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous

1. The daily emission limitation outlined in this permit is based upon the maximum hourly production/application rate at 24 hours per day. Therefore, no hourly and/or daily records are required.
2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4555. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

Pollutant: Glycol Ethers

TLV (ug/m3): 18

Maximum Hourly Emission Rate (lbs/hr): 1.04

**Predicted 1 Hour Maximum Ground-Level Concentration at
the Fenceline (ug/m3): 10.8**

**Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m3): 429**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4555 and the operating permit:

- (a) Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table.
- (b) Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- (c) Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

Milton Can Company

PTI 14-4555

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- (d) Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].

- (e) Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

Permit Review Narrative
14-4555

Milton Can Company
8200 Broadwell Road
Cincinnati, Ohio 45244-1698

PN: 1431340460

The Milton Can Company produces metal aerosol cans. This permit to install is for a new conventional coating line. This new equipment consists of a roll coater with permanent total enclosure, drying oven, and a thermal incinerator. This will be a synthetic minor for VOC's in order to avoid the Emission Offset Rule. A rolling monthly summation of the coating and cleanup material usage will be incorporated to ensure federal enforceability.

This emissions unit is regulated by Ohio Administrative Code (OAC) rules 3745-31-05 (BAT), 3745-21-09(D) and 3745-15-07.

Compliance with emission, VOC content and coating usage restrictions along with the use of a thermal incinerator and permanent total enclosure constitutes BAT for this emissions unit. The actual and allowable VOC emissions are 74.6 pounds per day and 13.6 tons per year. The allowable and actual emissions are the same since the emissions were calculated at 24 hours per day and 365 days per year. The VOC content of the coatings is limited to 6.1 pounds per gallon and cleanup materials are limited to 7.5 pounds per gallon. Usage limitations and control equipment with a 95% total control efficiency will ensure compliance with the annual emission limitations.

Milton Can has applied for permits to install for three presses. The total emissions from the three presses was 20.8 tons per year. With the addition of the new press, the total new emissions will be 13.6 tons per year. If the installation of all four presses were considered one project, the total emissions would be 34.4 tons per year, which is less than the 40 tons per year major modification level.

I recommend approval of this permit to install based on the type of control equipment which will maintain low VOC emissions.

Permit Fee: \$200.00

Prepared by: Thomas P. Wittekind
Date prepared: April 1, 1998

Synthetic Minor Determination

Milton Can Company
PTI 14-4555

A. Source Description:

The Milton Can Company has submitted an application to install a new conventional can coating line. This new equipment is used in the production of aerosol cans.

B. Facility Description:

This facility is located in Eastern Hamilton County, Ohio and is a major facility for VOC's. Hamilton County is classified as non-attainment for ozone.

C. Source Emissions:

Potential VOC emissions from this emissions unit will be limited, through this PTI, to 13.6 tons per year. Without the permanent total enclosure and thermal incinerator this emissions unit would have maximum uncontrolled VOC emissions of 272.4 tons per year.

Compliance testing of the control equipment will be required in order to ensure a 100% capture efficiency and overall control efficiency of 95%. Compliance with the annual coating and cleanup material usage limits will be based upon a rolling, 12-month summation. This facility will maintain monthly records and submit excursion reports that identify all exceedances of the rolling, 12-month usage rate limitation.

D. Conclusion:

With this permit, the federally enforceable terms and conditions will limit the annual VOC emissions and require the use of control equipment so that the emissions unit has a potential to emit less than 40 tons per year of VOC's. The Milton Can Company will avoid the Emissions Offset Rule through this PTI.

Thomas P. Wittekind
April 1, 1998

