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Facility Name: **Milton Can Company**

Application Number: **14-4643**

Date: **March 31, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Condition A.5.			
Permit Allowable Mass Emissions and/or Control/Usage Requirements	See General Terms			
	Less stringent than BAT.			
74.7 lbs. VOC/day				
13.64 TPY VOC including cleanup based on a rolling 12-month summation.				
See Additional Special Term and				

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- * The emission limitation established by this rule is less stringent than those established by OAC rule 3745-31-05 (BAT).

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	13.64

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Department of Environmental Services, Air Quality Programs, 1632 Central Parkway, Cincinnati, Ohio 45210.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s)

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shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Department of Environmental Services, Air Quality Programs, 1632 Central Parkway, Cincinnati, Ohio 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. Daily emissions of volatile organic compounds from emissions unit K053 shall not exceed 74.7 pounds/day.
2. The permittee shall not employ coatings in emissions unit K053 with a VOC content greater than 6.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

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3. The permittee shall not employ cleanup materials in emissions unit K053 with a VOC content greater than 9.1 pounds of VOC per gallon, as applied.
4. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed the following: 77,800 gallons of coating per year and 6100 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 (Gallons)</u>	<u>Maximum Allowable Cumulative Cleanup Material Usage (GAL)</u>
1-2	38,900	3050
1-3	38,900	3050
1-4	38,900	3050
1-5	38,900	3050
1-6	38,900	3050
1-7	45,383	3558
1-8	51,867	4067
1-9	58,350	4575
1-10	64,833	5083
1-11	71,317	5592
1-12	77,800	6100

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

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control efficiency of 95%.

6. The hourly emissions limitation outlined in this permit is based upon the maximum hourly production/application rate. Therefore, no hourly records are required.

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 emissions 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 each day for the control equipment:

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- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and,
 - 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); and,
 - 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;

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- 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 the 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 Additional Special Term and Condition B.1.

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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 Additional Special Term and Condition B.2.
3. The permittee shall submit an annual report of the VOC emissions. The permittee may elect to submit Title V emissions fee reports in lieu of annual reports for those emissions required by the Title V emissions fee regulation. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing exceedances of the coating and/or cleanup material VOC content limitations.
5. 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.
6. 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 Hamilton County Department of Environmental Services;
 - 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

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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 Hamilton County Department of Environmental Services. 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 emissions testing shall be conducted within 3

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months after startup of the emissions unit;

- b. the emissions testing shall be conducted to demonstrate compliance with the control efficiency of not less than 95 percent and a capture efficiency of not less than 100 percent by weight of all VOC emissions entering the control device; and,
- c. the test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for the allowable mass emissions 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; and,

- d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity,

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unless otherwise specified or approved by the Hamilton County Dept. of Environmental Services.

4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Dept. of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operation 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 Hamilton County Dept. Of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Dept of Environmental Services 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 Hamilton County Dept. Of Environmental Services 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 Hamilton County Department of Environmental Services.

F. Miscellaneous

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4643. 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

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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): 18,000

Maximum Hourly Emission Rate (lbs/hr): 1.05

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 22.4

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;

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- 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; and,
- 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)].
2. The following is a summary of the netting emissions in tons per year (TPY):

<u>Emissions unit</u>	<u>Pollutant</u>	<u>Decrease</u>	<u>Increase</u>
K040	VOC	-18.26*	
K049 (PTI 14-4457)	VOC		+ 2.94
K050 (PTI 14-4545)	VOC		+13.6
K051 (PTI 14-4555)	VOC		+13.6
K052 (PTI 14-4554)	VOC		+ 4.26
K053 (PTI 14-4643)	VOC		+13.64
Net emissions change			+29.78

- * Based on average actual controlled emissions from 1992 and 1993. Emissions unit K040 was shut down during 1994 and has not been operational since then.