

Statement of Basis For Title V Permit

Company Name	Milton Can Co.	
Premise Number	1431340460	
Number of Non-insignificant Emissions Units	16	
What makes this facility a Title V facility?	VOC and HAP's	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1.			See Part II.B.1.

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

- If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K007, K049, K052	2.8 lbs VOC / gal. of coating minus water and exempt solvents.	21-09 (D) (2) (b)	N	N	N	Y	Y	Y	N	M. R. Rp. ET. No monitoring required to demonstrate compliance. Permittee shall maintain records that record the VOC content of each coating employed. Permittee shall submit a deviation report regarding any exceedance of the limitations as outlined. USEPA Methods 24 and 24A shall be used to determine VOC content.
K008, K009, K041, K044, K046	2.8 lbs VOC/gal. of coating minus water and exempt solvents, OR capture and control emissions to provide overall control efficiency of 81% and control equipment demonstrates a minimum 90% reduction by weight of the VOC vented to it.	21-09 (D)(2) (b) or 21-09 (B)(6)	N	Y	Y	Y	Y	Y	N	OR. M. R. Rp. ET. When employing inks or coatings with VOC content in excess of 2.8 lbs./gal., emissions shall be vented to catalytic incinerator with a minimum inlet temperature not less than 50 degrees below average temperature of gases during most recent performance test which demonstrated compliance. Average temperature difference across the catalyst bed at max operating capacity not to be less than 80% of average temperature difference during most recent test which demonstrated compliance. Continuous temperature monitoring upstream and downstream of the catalyst bed. Permittee shall maintain records that record the daily VOC content of each coating employed, recording 3-hour temperature averages. Permittee shall submit a deviation report regarding any exceedance of the VOC content limitations as outlined. Permittee shall also submit quarterly summaries of the catalytic incinerator record keeping requirements. Stack test required following methods outlined in OAC 3745-21-10 and USEPA Methods 24 and 24A to determine VOC content.
K028- K031, K033	5.5 lbs VOC / gal. of coating minus water and exempt solvents.	21-09 (D)(2) (d)	N	N	N	Y	Y	Y	N	M. R. Rp. ET. No monitoring required to demonstrate compliance. Permittee shall maintain records that record the VOC content of each coating employed. Permittee shall submit a deviation report regarding any exceedance of the limitations as outlined. USEPA Method 24 shall be used to determine VOC content.
K050, K051	Less stringent than VOC content limit established in accordance with OAC rule 3745-31- 05(A)(3) below.	21-09 (D)	N	NA	N	N	NA	NA	NA	Limit less stringent. See requirements established according to 3745-31-05 below.

K050, K051	76.9 lbs/day VOC and 13.6 TPY VOC, including cleanup, based on a rolling, 12-month summation 6.3 lbs VOC/gallon coating, excluding water and exempt solvents 9.1 lbs VOC/gallon for cleanup materials Permanent total enclosure with 100% capture and a thermal oxidizer with 95% VOC destruction efficiency Minimum overall control efficiency of 95%	N	Y 31-05	Y	Y	Y	Y	Y	Y	<p>OR: Coating and cleanup usage limits based on a rolling, 12-month summation. Thermal incinerator with a minimum temp not less than 50 degrees below the average temperature of the gases during the most recent compliance test which demonstrated compliance. Permanent total enclosure at a minimum pressure differential that is not less than the minimum pressure differential from the most recent compliance test which demonstrated compliance.</p> <p>M: Continuous temperature and pressure differential monitoring.</p> <p>R: Records of temperature and pressure differential. Monthly records of the VOC content, usage rate, and VOC emissions for coatings and cleanup materials.</p> <p>Rp: Permittee shall submit a deviation report regarding any exceedance of the limitations as outlined.</p> <p>ET: Stack test required following the methods outlined in OAC 3745-21-10. USEPA Method 24 shall be used to determine VOC contents.</p> <p>Misc: Daily emission limitations outlined are based upon the maximum hourly production/application rate at 24 hours/day. Therefore, no hourly and/or daily records are required.</p>
K054	1.64 lbs/hr VOC, excluding cleanup and 9.7 TPY VOC, including cleanup 5.5 lbs VOC/gal. of coating minus water and exempt solvents.	N	Y 31-05	N	N	Y	Y	Y	Y	<p>OR: 7.03 lbs/gal VOC for cleanup materials.</p> <p>M: No monitoring required to demonstrate compliance.</p> <p>R: Permittee shall maintain monthly records of VOC content, usage rate, and VOC emissions for coating and cleanup materials.</p> <p>Rp: Permittee shall submit a deviation report regarding any exceedance of the limitations as outlined as well as an annual report for VOC emissions.</p> <p>ET: USEPA Method 24 shall be used to determine compliance with the VOC content limitation.</p> <p>Misc: Summary of netting emissions.</p>

K054	5.5 lbs VOC/gal. of coating minus water and exempt solvents	21-09 (D)(2) (d)	N	N	N	Y	Y	N	N	M. No monitoring required to demonstrate compliance. R. Permittee shall maintain records that record the VOC content of each coating employed. Rp. Permittee shall submit a deviation report regarding any exceedance of the limitations as outlined. ET. No testing required to demonstrate compliance.
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EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For each column where “N” is specified, there should be a brief explanation in the “Comments” section. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
 2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
 3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.
- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.