



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/25/01

CERTIFIED MAIL

RE: Proposed Title V Chapter 3745-77 permit

14-31-34-0460

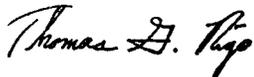
Milton Can Company

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Milton Can Company, has been created in Ohio EPA's State Air Resources System (STARS) on 04/25/01, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Hamilton County Dept. of Environmental Services
Becky Castle, DAPC PMU

Ohio EPA

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Date: 04/25/01

Effective Date: **To be entered upon final issuance**

Expiration Date: **To be entered upon final issuance**

This document constitutes issuance to:

Milton Can Company
8200 Broadwell Road
Cincinnati, OH 45244

of a Title V permit for Facility ID: 14-31-34-0460

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:

K007 (Litho 1)
Conventional Printing Press with Coater

K008 (Litho 2)
Conventional Printing Press with Coater

K009 (Litho 3)
Conventional Printing Press with Coater

K028 (Can Line 2)
Side Seam Stripe Applicator 2

K029 (Can Line 3)
Side Seam Stripe Applicator 3

K030 (Can Line 1)
Side Seam Stripe Applicator 1

K031 (Can Line 4)
Side Seam Stripe Applicator 4

K033 (Can Line 5)
Side Seam Stripe Applicator 5

K041 (Coater 2)
Conventional Coater

K044 (Coater 5)
Conventional Coater

K046 (Coater 8)
Conventional Coater

K049 (Litho 6)
UV Printing Press with Coater

K050 (Coater 9)
Conventional Coater with Incinerator

K051 (Coater 10)
Conventional Coater with Incinerator

K052 (Litho 7)
UV Printing Press with Coater

K054 (Can Line 6)
Side Seam Stripe Applicator 6

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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. Support information shall include 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 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.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-

annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the

Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC

rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

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 31, April 30, July 31, and October 31 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.)

3. Records Retention Requirements

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. 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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. **None**

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B002: Boiler #1; and
B003: Boiler #2.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Litho 1 (K007)
Activity Description: Conventional Printing Press with Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece can coating line, overvarnish (# 1)	OAC rule 3745-21-09(D)(2)(b)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The VOC content as applied, of each coating employed shall not exceed 2.8 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

1. **None**

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

Facility Name: **Milton Can Company**

Facility ID: **14-31-34-0460**

Emissions Unit: **Litho 1 (K007)**

V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece can coating line, overvarnish (#1)	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Litho 2 (K008)
Activity Description: Conventional Printing Press with Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece can coating line with thermal incinerator, overvarnish (#2)	OAC rule 3745-21-09(B)(6)	See A.I.2.a below.
	OAC rule 3745-21-09(D)(2)(b)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a When employing noncomplying coatings, the thermal incinerator shall maintain an 81% overall reduction, by weight, of the VOC emissions vented to it, and a minimum control efficiency of not less than 90%, by weight.
- 2.b When the thermal incinerator is not in operation, the VOC content as applied, of each coating employed shall not exceed 2.8 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

1. When employing noncomplying coatings, the emissions from this emissions unit shall be vented to the thermal incinerator.
2. 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.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month whenever the emissions unit is in operation and the thermal incinerator is not being employed:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion 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:

- a. 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 the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings when the thermal incinerator was not in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services 30 days following the end of the calendar month.
2. 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 above.

V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. 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.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit to determine compliance with OAC rule 3745-21-09(B)(6) in accordance with the following requirements:
 - a. The emission testing shall be conducted within 1 year from the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency of not less than 81% and a control efficiency of not less than 90%, 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 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. 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 Hamilton County Department of Environmental Services.

Facility Name: **Milton Can Company**

Facility ID: **14-31-34-0460**

Emissions Unit: **Litho 2 (K008)**

V. Testing Requirements (continued)

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 Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece can coating line with thermal incinerator, overvarnish (#2)	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Litho 3 (K009)

Activity Description: Conventional Printing Press with Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-piece can coating line with thermal incinerator, overvarnish (# 3)	OAC rule 3745-21-09(B)(6)	See A.I.2.a below.
	OAC rule 3745-21-09(D)(2)(b)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a When employing noncomplying coatings, the thermal incinerator shall maintain an 81% overall reduction, by weight, of the VOC emissions vented to it, and a minimum control efficiency of not less than 90%, by weight.
- 2.b When the thermal incinerator is not in operation, the VOC content as applied, of each coating employed shall not exceed 2.8 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

1. When employing noncomplying coatings, the emissions from this emissions unit shall be vented to the thermal incinerator.
2. 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.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month whenever the emissions unit is in operation and the thermal incinerator is not being employed:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion 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:

- a. 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 the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings when the thermal incinerator was not in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services 30 days following the end of the calendar month.
2. 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 above.

V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. 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.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit to determine compliance with OAC rule 3745-21-09(B)(6) in accordance with the following requirements:
 - a. The emission testing shall be conducted within 1 year from the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency of not less than 81% and a control efficiency of not less than 90%, 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 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. 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 Hamilton County Department of Environmental Services.

Facility Name: **Milton Can Company**

Facility ID: **14-31-34-0460**

Emissions Unit: **Litho 3 (K009)**

V. Testing Requirements (continued)

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 Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions

<u>and/or Equipment</u>	<u>Requirements</u>	<u>Applicable Emissions Measures</u>
3-piece can coating line with thermal		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV.

None

V.

None

VI.

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 2 (K028)
Activity Description: Side Seam Stripe Applicator 2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #2	OAC rule 3745-21-09(D)(2)(d)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The VOC content as applied, of each coating employed shall not exceed 5.5 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facility Name: **Milton Can Company**
Facility ID: **14-31-34-0460**
Emissions Unit: **Can Line 2 (K028)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #2	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 3 (K029)
Activity Description: Side Seam Stripe Applicator 3

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #3	OAC rule 3745-21-09(D)(2)(d)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The VOC content as applied, of each coating employed shall not exceed 5.5 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facility Name: **Milton Can Company**
Facility ID: **14-31-34-0460**
Emissions Unit: **Can Line 3 (K029)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #3	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 1 (K030)
Activity Description: Side Seam Stripe Applicator 1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #1	OAC rule 3745-21-09(D)(2)(d)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The VOC content as applied, of each coating employed shall not exceed 5.5 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facility Name: **Milton Can Company**
Facility ID: **14-31-34-0460**
Emissions Unit: **Can Line 1 (K030)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #1	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 4 (K031)
Activity Description: Side Seam Stripe Applicator 4

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #4	OAC rule 3745-21-09(D)(2)(d)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The VOC content as applied, of each coating employed shall not exceed 5.5 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facility Name: **Milton Can Company**
Facility ID: **14-31-34-0460**
Emissions Unit: **Can Line 4 (K031)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #4	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 5 (K033)
Activity Description: Side Seam Stripe Applicator 5

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #5	OAC rule 3745-21-09(D)(2)(d)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The VOC content as applied, of each coating employed shall not exceed 5.5 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facility Name: **Milton Can Company**

Facility ID: **14-31-34-0460**

Emissions Unit: **Can Line 5 (K033)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #5	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coater 2 (K041)
Activity Description: Conventional Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
basecoat roll coater with catalytic incinerator, Coater #2	OAC rule 3745-21-09(B)(6)	See A.I.2.a below.
	OAC rule 3745-21-09(D)(2)(a)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a When employing noncomplying coatings, the catalytic incinerator shall maintain an 81% overall reduction, by weight, of the VOC emissions vented to it, and a minimum control efficiency of not less than 90%, by weight.
- 2.b When the catalytic incinerator is not in operation, the VOC content as applied, of each coating employed shall not exceed 2.8 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

1. When employing noncomplying coatings, the emissions from this emissions unit shall be vented to the catalytic incinerator.
2. The average temperature of the exhaust gases immediately before the catalyst bed for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month whenever the emissions unit is in operation and the catalytic incinerator is not being employed:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature immediately upstream and downstream of the incinerator's catalyst bed 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. 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 (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
- c. All 3-hour blocks of time (when the emissions unit was in operation at maximum operating capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings when the catalytic incinerator was not in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly summaries of the following records:
 - 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 (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation at maximum operating capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 30, October 30, and January 30, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit to determine compliance with OAC rule 3745-21-09(B)(6) in accordance with the following requirements:
 - a. The emission testing shall be conducted within 1 year from the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency of not less than 81% and a control efficiency of not less than 90%, 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 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. 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 Hamilton County Department of Environmental Services.

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 Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
basecoat roll coater with catalytic incinerator, Coater #2	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coater 5 (K044)
Activity Description: Conventional Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
basecoat roll coater with catalytic incinerator, Coater #5	OAC rule 3745-21-09(B)(6)	See A.I.2.a below.
	OAC rule 3745-21-09(D)(2)(a)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a When employing noncomplying coatings, the catalytic incinerator shall maintain an 81% overall reduction, by weight, of the VOC emissions vented to it, and a minimum control efficiency of not less than 90%, by weight.
- 2.b When the catalytic incinerator is not in operation, the VOC as applied, content of each coating employed shall not exceed 2.8 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

1. When employing noncomplying coatings, the emissions from this emissions unit shall be vented to the catalytic incinerator.
2. The average temperature of the exhaust gases immediately before the catalyst bed for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month whenever the emissions unit is in operation and the catalytic incinerator is not being employed:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature immediately upstream and downstream of the incinerator's catalyst bed 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. 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 (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
- c. All 3-hour blocks of time (when the emissions unit was in operation at maximum operating capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings when the catalytic incinerator was not in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly summaries of the following records:
 - 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 (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation at maximum operating capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 30, October 30, and January 30, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit to determine compliance with OAC rule 3745-21-09(B)(6) in accordance with the following requirements:
 - a. The emission testing shall be conducted within 1 year from the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency of not less than 81% and a control efficiency of not less than 90%, 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 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. 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 Hamilton County Department of Environmental Services.

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 Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
basecoat roll coater with catalytic incinerator, Coater #5	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coater 8 (K046)
Activity Description: Conventional Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
basecoat roll coater with catalytic incinerator, Coater #8	OAC rule 3745-21-09(B)(6)	See A.I.2.a below.
	OAC rule 3745-21-09(D)(2)(a)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a When employing noncomplying coatings, the catalytic incinerator shall maintain an 81% overall reduction, by weight, of the VOC emissions vented to it, and a minimum control efficiency of not less than 90%, by weight.
- 2.b When the catalytic incinerator is not in operation, the VOC as applied, content of each coating employed shall not exceed 2.8 pounds per gallon, excluding water and exempt solvents.

II. Operational Restrictions

1. When employing noncomplying coatings, the emissions from this emissions unit shall be vented to the catalytic incinerator.
2. The average temperature of the exhaust gases immediately before the catalyst bed for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month whenever the emissions unit is in operation and the catalytic incinerator is not being employed:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature immediately upstream and downstream of the incinerator's catalyst bed 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. 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 (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
- c. All 3-hour blocks of time (when the emissions unit was in operation at maximum operating capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings when the catalytic incinerator was not in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly summaries of the following records:
 - 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 (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation at maximum operating capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 30, October 30, and January 30, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit to determine compliance with OAC rule 3745-21-09(B)(6) in accordance with the following requirements:
 - a. The emission testing shall be conducted within 1 year from the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency of not less than 81% and a control efficiency of not less than 90%, 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 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. 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 Hamilton County Department of Environmental Services.

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 Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
basecoat roll coater with catalytic incinerator, Coater #8	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Litho 6 (K049)
Activity Description: UV Printing Press with Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV printing and coating line for aerosol cans	OAC rule 3745-31-05(A)(3) (PTI 14-4457)	16.2 pounds of volatile organic compounds (VOC) per day 2.94 tons of VOC per year
	OAC rule 3745-21-09(D)(2)(b)	See A.I.2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The pounds per day and tons of VOC per year emission limitations reflect the potential to emit for this emissions unit; therefore, there are no additional monitoring, record keeping, or reporting requirements associated with these emission limitations.

II. Operational Restrictions

1. The VOC content as applied, of each coating employed shall not exceed 0.10 pound per gallon, excluding water and exempt solvents.
2. The permittee shall not employ cleanup materials in this emissions unit with a VOC content greater than 7.1 pounds per gallon.
3. The maximum coating and cleanup material usages for this emissions unit shall not exceed the following:
 - a. 90.96 gallons per day of coating, excluding water and exempt solvents;
 - b. 1 gallon per day of cleanup material;
 - c. 33,200 gallons per year of coating, excluding water and exempt solvents; and
 - d. 360 gallons per year of cleanup material.

These coating and cleanup material limitations reflect the potential to emit for this emissions unit; therefore, there are no additional monitoring, record keeping, or reporting requirements associated with these limitations.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content of each coating and cleanup material (excluding water and exempt solvents), as applied.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing any exceedance of the coating or cleanup material VOC content limitations. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the total coating and cleanup material usage rates and the total VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. 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.
2. Emission Limitation:
16.2 pounds of VOC per day

Applicable Compliance Method:
This emission limitation reflects the potential to emit for the emissions unit and was established by multiplying the emissions unit's maximum hourly coating usage rate (3.79 gallons per hour) by the maximum allowable VOC content (.10 pound per gallon) and by 24, and adding that product to the total daily cleanup material emissions (1 gallon per day multiplied by the maximum allowable VOC content of 7.1 pounds per gallon). Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Section A.III.1 of this permit.
3. Formulation data may be used to determine the VOC contents of the cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV printing and coating line for aerosol cans	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coater 9 (K050)
Activity Description: Conventional Coater with Incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Metal sheet roll coater with drying oven and thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 14-4545)	76.9 pounds of volatile organic compounds (VOC) per day and 13.6 tons of VOC per year, including cleanup material emissions, based on a rolling, 12-month summation
	OAC rule 3745-21-09(D)	See A.I.2. The emission limitation specified in this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The pounds per day VOC emission limitation reflects the potential to emit for this emissions unit; therefore, there are no additional monitoring, record keeping, or reporting requirements associated with this emission limitation.
- 2.b This emissions unit shall be equipped with hooding and ductwork to provide not less than a 97% capture efficiency and shall be vented to a thermal incinerator with 98% destruction efficiency thus giving an overall control efficiency of 95%.
- 2.c The permittee shall not employ coatings in this emissions unit with a VOC content greater than 6.3 pounds per gallon, excluding water and exempt solvents.
- 2.d The permittee shall not employ cleanup materials in this emissions unit with a VOC content greater than 9.1 pounds per gallon, as applied.

II. Operational Restrictions

1. The maximum annual coating usage rate for this emissions unit shall not exceed 77,800 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.
2. 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.
3. The maximum annual cleanup material usage rate for this emissions unit shall not exceed 6,100 gallons per year, based upon a rolling, 12-month summation of the cleanup material usage figures.

III. Monitoring and/or Record Keeping Requirements

1. 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 and in pounds per gallon excluding water and exempt solvents, as applied;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all coatings employed;
 - e. the name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the total number of gallons of all cleanup materials employed;
 - h. the VOC content of each cleanup material, in pounds per gallon, as applied;
 - i. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - j. 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 for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance shall be used);
 - k. the rolling, 12-month summation of VOC emissions (the monthly emission rate recorded in A.III.1.j added to the previous 11-month emission rate);
 - l. the rolling, 12-month summation of coating usage (the monthly usage rate recorded in A.III.1.d added to the previous 11-month usage rate); and
 - m. the rolling, 12-month summation of cleanup material usage (the monthly usage rate recorded in A.III.1.g added to the previous 11-month usage rate).
2. 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.
3. The permittee shall record and maintain the following information on a daily basis:
 - a. 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; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. 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 Section A.II.2;
 - b. any exceedance of the rolling, 12-month coating usage limitation;
 - c. any exceedance of the rolling, 12-month cleanup material usage limitation; and
 - d. any exceedance of the rolling, 12-month VOC emission limitation.
2. 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. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
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 February 15 of each year.

V. Testing Requirements

1. Emission Limitation:
76.9 pounds of VOC per day

Applicable Compliance Method:
This emission limitation reflects the potential to emit for the emissions unit and was established by multiplying the emissions unit's maximum hourly coating usage rate (9.17 gallons per hour) by the maximum allowable VOC content (6.3 pounds per gallon) and by 24, and adding that product to the total daily cleanup material emissions (16.7 gallons per day multiplied by the maximum allowable VOC content of 9.1 pounds per gallon), and multiplying the resulting value by the required overall control efficiency (0.05). Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Section A.III and the emission testing requirements specified in Section A.V of this permit.
2. Emission Limitation:
13.6 tons of VOC per year, including cleanup material emissions, based on a rolling, 12-month summation

Applicable Compliance Method:
Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Section A.III of this permit.
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 5 years from the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the 95% overall control efficiency requirement, the 98% control efficiency requirement, and the 97% capture efficiency requirement.
 - 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. 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.

V. Testing Requirements (continued)

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 Hamilton County Department of Environmental Services.

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 Department of Environmental Services. 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 Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department 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 Department 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.

4. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data may be used to determine the VOC contents of the cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Metal sheet roll coater with drying oven and thermal incinerator.	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coater 10 (K051)
Activity Description: Conventional Coater with Incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Metal sheet roll coater with drying oven and thermal incinerator	OAC rule 3745-21-09(D)	76.9 pounds of volatile organic compounds (VOC) per day and 13.6 tons of VOC per year, including cleanup material emissions, based on a rolling, 12-month summation See A.I.2. The emission limitation specified in this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The pounds per day VOC emission limitation reflects the potential to emit for this emissions unit; therefore, there are no additional monitoring, record keeping, or reporting requirements associated with this emission limitation.
- 2.b This emissions unit shall be equipped with hooding and ductwork to provide not less than a 97% capture efficiency and shall be vented to a thermal incinerator with 98% destruction efficiency thus giving an overall control efficiency of 95%.
- 2.c The permittee shall not employ coatings in this emissions unit with a VOC content greater than 6.3 pounds per gallon, excluding water and exempt solvents.
- 2.d The permittee shall not employ cleanup materials in this emissions unit with a VOC content greater than 9.1 pounds per gallon, as applied.

II. Operational Restrictions

1. The maximum annual coating usage rate for this emissions unit shall not exceed 77,800 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.
2. 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.
3. The maximum annual cleanup material usage rate for this emissions unit shall not exceed 6,100 gallons per year, based upon a rolling, 12-month summation of the cleanup material usage figures.

III. Monitoring and/or Record Keeping Requirements

1. 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 and in pounds per gallon excluding water and exempt solvents, as applied;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all coatings employed;
 - e. the name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the total number of gallons of all cleanup materials employed;
 - h. the VOC content of each cleanup material, in pounds per gallon, as applied;
 - i. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - j. 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 for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance shall be used);
 - k. the rolling, 12-month summation of VOC emissions (the monthly emission rate recorded in A.III.1.j added to the previous 11-month emission rate);
 - l. the rolling, 12-month summation of coating usage (the monthly usage rate recorded in A.III.1.d added to the previous 11-month usage rate); and
 - m. the rolling, 12-month summation of cleanup material usage (the monthly usage rate recorded in A.III.1.g added to the previous 11-month usage rate).
2. 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.
3. The permittee shall record and maintain the following information on a daily basis:
 - a. 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; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. 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 Section A.II.2;
 - b. any exceedance of the rolling, 12-month coating usage limitation;
 - c. any exceedance of the rolling, 12-month cleanup material usage limitation; and
 - d. any exceedance of the rolling, 12-month VOC emission limitation.
2. 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. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
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 February 15 of each year.

V. Testing Requirements

1. Emission Limitation:
76.9 pounds of VOC per day

Applicable Compliance Method:

This emission limitation reflects the potential to emit for the emissions unit and was established by multiplying the emissions unit's maximum hourly coating usage rate (9.17 gallons per hour) by the maximum allowable VOC content (6.3 pounds per gallon) and by 24, and adding that product to the total daily cleanup material emissions (16.7 gallons per day multiplied by the maximum allowable VOC content of 9.1 pounds per gallon), and multiplying the resulting value by the required overall control efficiency (0.05). Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Section A.III and the emission testing requirements specified in Section A.V of this permit.

2. Emission Limitation:
13.6 tons of VOC per year, including cleanup material emissions, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Section A.III of this permit.

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 5 year from the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the 95% overall control efficiency requirement, the 98% control efficiency requirement, and the 97% capture efficiency requirement.
 - 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. 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.

V. Testing Requirements (continued)

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 Hamilton County Department of Environmental Services.

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 Department of Environmental Services. 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 Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department 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 Department 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.

4. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data may be used to determine the VOC contents of the cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Metal sheet roll coater with drying oven and thermal incinerator.	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Litho 7 (K052)

Activity Description: UV Printing Press with Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV printing and coating line for aerosol cans	OAC rule 3745-31-05 (PTI 14-4554)	23.3 pounds of volatile organic compounds (VOC) per day and 2.26 tons of VOC per year
	OAC rule 3745-21-09(D)(2)(b)	0.23 pound of ozone per hour and 1.0 ton of ozone per year The emission limitation specified by this rule is less stringent than the emission limitation established

2. Additional Terms and Conditions

- 2.a The pounds per day VOC emission limitation and the pound per hour and ton per year ozone emission limitations reflect the potential to emit for this emissions unit; therefore, there are no additional monitoring, record keeping, or reporting requirements associated with these emission limitations.
- 2.b The permittee shall only use ultraviolet cured inks and coatings in this emissions unit.

II. Operational Restrictions

1. The VOC content of each coating employed shall not exceed 0.10 pound per gallon, excluding water and exempt solvents.
2. The VOC content of each cleanup material employed shall not exceed 7.1 pounds per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content of each coating and cleanup material (excluding water and exempt solvents), as applied.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing any exceedance of the coating or cleanup material VOC content limitations. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the total coating and cleanup material usage rates and the total VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Emission Limitations:
23.3 pounds of volatile organic compounds (VOC) per day and 2.26 tons of VOC per year

Applicable Compliance Method:

This emission limitation reflects the potential to emit for the emissions unit and was established by multiplying the emissions unit's maximum hourly coating usage rate (3.8 gallons per hour) by the maximum allowable VOC content (.10 pound per gallon) and by 24, and adding that product to the total daily cleanup material emissions (2 gallons per day multiplied by the maximum allowable VOC content of 7.1 pounds per gallon). Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Sections A.III.1 of this permit.

2. Emission Limitations:
0.23 pound of ozone per hour and 1.0 ton of ozone per year

Applicable Compliance Method:

These emission limitations reflect the potential to emit for the emissions unit and were established based upon data provided by the permittee for the ultraviolet curing operations.

3. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. 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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV printing and coating line for aerosol cans	none	

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Can Line 6 (K054)
Activity Description: Side Seam Stripe Applicator 6

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
side-seam strip applicator, Applicator #6	OAC rule 3745-31-05 (PTI 14-4686)	1.64 pounds of volatile organic compounds (VOC) per hour, excluding cleanup material emissions and 9.7 tons of VOC per year, including cleanup material emissions
	OAC rule 3745-21-09(D)(2)(d)	See A.I.2.a and A.II.1 below. See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The pounds per hour VOC emission limitation reflects the potential to emit for this emissions unit; therefore, there are no additional monitoring, record keeping, or reporting requirements specified for this emission limitation.
- 2.b The VOC content of each coating employed shall not exceed 5.5 pounds per gallon of coating, excluding water and exempt solvents.

II. Operational Restrictions

1. The VOC content from each cleanup material employed in this emissions unit shall not exceed 7.03 pounds per gallon of coating, as applied.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - d. The VOC content of each cleanup material, in pounds per gallon.
 - e. The number of gallons of each cleanup material employed.
 - f. The total monthly VOC emissions from all coatings and cleanup materials employed, in pounds or tons ([the summation of A.III.1.b X A.III.1.c for each coating] + [the summation of A.III.1.d X A.III.1.e for each cleanup material]).

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings (i.e., for the coating and/or cleanup material VOC content limitations). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. 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 and cover the previous years operation.

V. Testing Requirements

1. Emission Limitation:
1.64 pounds of VOC per hour

Applicable Compliance Method:

This emission limitation reflects the potential to emit for the emissions unit and was established by multiplying the emissions unit's maximum hourly coating usage rate (.3 gallon per hour) by the maximum allowable VOC content (5.48 pounds per gallon). Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Sections A.III of this permit.

2. Emission Limitation:
9.7 tons of VOC per year

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to Sections A.III of this permit.

3. USEPA Method 24 shall be used to determine the VOC contents for the coatings 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 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data may be used to determine the VOC contents of the cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

1. The following is a summary of the netting emissions in tons per year (TPY):

Emissions unit	Pollutant	Decrease	Increase
K025	VOC	-35.73*	
K026	VOC	-25.36*	
K027	VOC	-25.73*	
K039	VOC	-1.16*	
K040	VOC	-18.26**	
K045	VOC	-35.73*	
K047	VOC	-8.05*	
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
K054 (PTI 14-4686)	VOC		+ 9.65
Net emissions change		-105.97	

* Emission credits are based on an average of the actual controlled emissions from the years 1996 and 1997.

** 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.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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side-seam strip applicator,
Applicator #6

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- The permit to install for this emissions unit (K054) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-butyl alcohol

TLV (ug/m3): 151,000

Maximum Hourly Emission Rate (lbs/hr): 1.64

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43

MAGLC (ug/m3): 3595

VI. Miscellaneous Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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