

West Virginia Department of Environmental Protection

*Joe Manchin, III
Governor*

Division of Air Quality

*Randy Huffman
Cabinet Secretary*

Permit for a Class II Administrative Update



R13-2410D

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Ardagh Metal Packaging USA, Inc.

Weirton Facility

009-00012

A handwritten signature in blue ink, appearing to read "William F. Durham", written over a horizontal line.

*William F. Durham
Director*

Issued: July 27, 2015

This permit will supercede and replace Permits R13-2410C.

Facility Location: Weirton, Brooke County, West Virginia

Mailing Address: 3030 Birch Dr.
Weirton, WV 26062

Facility Description: Can coating facility

SIC Codes: 3411

UTM Coordinates: 531.83 km Easting • 4,470.82 km Northing • Zone 17

Permit Type: Class II Administrative Update

Description of

Change: Update permit to reflect variability of coating materials and update the “Product Storage” column in Table 4.1.1; update permit for new HAPs; request lower temperature requirement for Thermal Oxidizer 3C; increase VOC emission limits for the bulk storage tanks; and update the permit to reflect the most recent VOC Capture and Destruction Efficiency testing.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Control Device
1S	4E, 5E, 6E, 7E	Coater Oven Line 1 - C1	Thermal Oxidizer 1 (1C)
2S	4E, 5E, 6E, 7E	Coater Oven Line 2 - C2	Thermal Oxidizer 1 (1C)
17S	23E & 24E	Coater Oven Line 3 - C3	Thermal Oxidizer 2 (2C)
18S	28E & 29E	Coater Oven Line 4 - C4	Thermal Oxidizer 3 (3C)
32S	32E	Cleaning	None
31S	31E	Litho Coater/Printer	None
15S, 16S, 30S	8E, 9E & 30E	Tanks	None

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-2410B. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2410C and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

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 defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit

and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
[WV Code § 22-5-4(a)(15)]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W. Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee.

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. The following maximum annual coating and solvent throughputs and volatile organic compound (VOC) emission rates for the following bulk storage tanks shall not be exceeded:

Bulk Storage Tank ID	Emission Point ID Number	Product in Storage	Maximum Annual Limits	
			Coating Throughput (gal/yr)	VOC Emissions (lb/yr)
Tank No. 1 (15S)	8E	PPG4348807 Clear Enamel	200,000	342
Tank No. 2 (16S)	9E	96X069A	200,000	342
Tank No. 3 (30S)	30E	Glycol Ether (2-n-Butoxy-1-ethanol)	154,000	3.2

Note: The above table is a snapshot of coating storage at permit approval time. The permittee is allowed to change coating storage as long as the requirements given in sections 4.1.8, 4.1.9, and 4.1.10 of this permit are met.

- 4.1.2 The number of metal sheets coated via Line 1-C1 (ID# 1S) shall not exceed 7,300/hr.
- 4.1.3 The number of metal sheets coated via Line 2-C2 (ID# 2S) shall not exceed 7,300/hr.
- 4.1.4 The number of metal sheets coated via Line 3-C3 (Spot Coater C-3 Continuous Drying Oven Type DBL (150' x 6.5' x 10') (ID# 17S)) shall not exceed 7,500/hr.
- 4.1.5 The number of metal sheets coated via Line 4-C4 (ID# 18S) shall not exceed 7,500/hr.
- 4.1.6 The metal can sheet coating lines and associated control devices shall be installed, maintained, and operated so as to achieve the following minimum VOC capture efficiencies:

Can Coating Line	Minimum VOC Capture Efficiency	Minimum VOC Control Efficiency
Line 1-C1 (1S)	100%	95%
Line 2-C2 (2S)	100%	95%
Line 3-C3 (17S)	100%	98%
Line 4-C4 (18S)	100%	99%

4.1.7 The following coatings and solvents have been permitted for use on metal can sheet coating lines C1-C4 (ID# 1S, 2S,17S, &18S), and at the maximum usage rates given below:

Description	Maximum Usage Rate	Maximum VOC Usage Rate
	(gal/yr)	(lb/yr)
Coatings		
9200-014	1,600	8,640
13S07WF	50,000	180,000
ICI 642E118	200,000	720,000
9851-019	185,000	943,500
9434039	7,500	64,425
9851-577	4,800	24,480
8406026	55	292
8744-902	110	583
20S78AA	2,000	17,200
20S82AA	600	3,720
20S67WA	50,000	421,500
6256054	10,000	53,000
PPG G23	300	1,530
657 HE 1293	7,500	59,925
657HE 13501	8,300	39,840
5698014	39,800	131,340
9009-920	38,900	202,280
9851-579	5,000	26,000
646C140	3,000	16,416
9851589	2,000	10,608
92x111H	10,000	88,000
96X069A	200,000	695,942
26S96EJ	300	3,540
2019-03	1,140	9,610
4001S13V	12,000	113,640
4348807	113,330	917,973

Description	Maximum Usage Rate	Maximum VOC Usage Rate
	(gal/yr)	(lb/yr)
4348312	3,207	25,978
816610	2,500	22,000
816361	1,800	14,868
51-017	3,000	25,500
Pastes, Lubricants, and Thinners		
4623105	1,100	5,610
1949101	7,000	23,100
6661011	210	1,365
7789001	300	1,080
Hi Sol 10	110	803
Glycol Ether EB	46,000	346,395
Mineral Spirits 66/3	10,000	64,974
Aromatic 100	208	1,508
Isophorone	52	355
Arcosolve PM Acetate	6,000	47,981
Belt Cleaners		
Eastman MPK	330	371
Cleanup Solvents		
Reformulated 4212-1	16,000	112,160
IPA Anhydrous	5,000	32,900
UV Wash 5700	2,000	11,400
General Wash	2,000	13,800
Total		5,506,132

Note: The above table is a snapshot of coating usage at permit approval time. The permittee is allowed to change coatings and coating usage rates as long as the requirements given in sections 4.1.8., 4.1.9., and 4.1.10. of this permit are met.

4.1.8 Use of any surface coating, paste, lubricant, thinner, solvent or cleaner containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed below shall be in accordance with the following:

- a. The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
- b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.

HAP	CAS Number	HAP	CAS Number
Cumene	98828	Xylene	1330207
Ethyl Benzene	100414	Isophorone	78591
Methyl Isobutyl Ketone	108101	Naphthalene	91203
Glycol Ethers	NA	*Cresol	1319223
Ethylene Glycol	107211	Toluene	108883
Formaldehyde	50000	Hexane	110543
Methanol	67561	Methyl Carbitol	111773
Phenol	108952		

Note: *Cresol may include o-cresol (CAS 95-48-7), m-cresol (CAS 108-39-4), or p-cresol (CAS 106-445) or a combination thereof.

4.1.9 Emissions of criteria pollutants from the facility shall not exceed the following:

	VOC		PM ₁₀		CO		SO ₂		NO _x	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Line 1-C1 (1S)	14.83	80.90	0	0	0	0	0	0	0	0
Line 2-C2 (2S)	14.83		0	0	0	0	0	0	0	0
Line 3-C3 (3S)	6.10		0	0	0	0	0	0	0	0
Line 4-C4 (4S)	3.05		0	0	0	0	0	0	0	0
Cleaning	279.53	58.20	0	0	0	0	0	0	0	0
Thermal Oxidizer 1C	0.08	0.36	0.11	0.50	1.26	5.52	0.01	0.04	1.50	6.57
Thermal Oxidizer 2C	0.03	0.14	0.05	0.20	0.50	2.21	0.01	0.02	0.30	1.31
Thermal Oxidizer 3C	0.03	0.14	0.05	0.20	0.50	2.21	0.01	0.02	0.30	1.31
Printer	1.03	2.58	0	0	0	0	0	0	0	0
Tanks	NA	0.34	0	0	0	0	0	0	0	0

- 4.1.10 Emissions of Hazardous Air Pollutants (HAPs) from the facility shall not exceed 10 tons per year of any individual HAP nor 25 tons per year of all combined HAPs
- 4.1.11 The metal can sheet coating lines shall be vented to thermal oxidizers (lines 1-C1 and 2-C2 to a common TO and lines 3-C3 and 4-C4 to two separate TO's) at all times during which the coating lines are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOC.
- 4.1.12 The maximum heat input rates and maximum natural gas consumption rates for pollution control devices 1C, 2C, and 3C shall not exceed the limits given below:

Can Coating Line	Pollution Control Device				
	Thermal Oxidizer ID #	Maximum Heat Input		Maximum Natural Gas Consumed	
		(MM Btu/hr)	(MM Btu/yr)	(ft ³ /hr)	(MM ft ³ /yr)
Lines 1-C1 & 2-C2 (ID#s 1S & 2S)	1C	15	131,400	15000	131.4
Line 3-C3 (ID# 17S)	2C	6	52,560	6,000	52.56
Line 4-C4 (ID# 18S)	3C	6	52,560	6,000	52.56

- 4.1.13 The thermal oxidizers 2C and 3C shall be operated at the following minimum combustion chamber temperatures during all times the coating line associated with the control device is in operation.

Can Coating Line	Pollution Control Device	
	Thermal Oxidizer ID #	Minimum Combustion Chamber Operating Temperature
Line 3-C3 (ID# 17S)	2C	1350°F
Line 4-C4 (ID# 18S)	3C	1275°F ⁽¹⁾

(1) The thermal oxidizer may be operated at a DAQ approved lower temperature while awaiting a permit update to formally lower the temperature. DAQ approval is granted to the permittee to lower the temperature once approved testing has shown that the control device still maintains its required destruction efficiency at the new lower temperature. All testing must be preceded by an approved test protocol and followed by the submittal to DAQ of a test report.

- 4.1.14 During all times coating Line 1-C1 and/or coating Line 2-C2 are in operation, thermal oxidizer 1C shall be operated at the minimum temperature established during the most recent performance test which showed compliance with the requirements of conditions 4.1.6 and 4.1.9 of this permit.

4.1.15 The can end making lines originally permitted in R13-1042R (issued January 26, 1989) are authorized only to be installed and operated using water based compounds with zero VOC and HAP content.

4.1.16 **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Testing Requirements

4.2.1. The owner or operator of the affected facility shall construct the VOC emission reductions systems so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures of 40 CFR 60, Appendix A.

4.2.2 Within 180 days of the issuance of R13-2410B (October 5, 2006) and at least once every 5 years thereafter the permittee shall perform or have performed USEPA approved tests to determine compliance with the emission limitations and emissions control requirements set forth in conditions 4.1.6 and 4.1.9. VOC capture and destruction efficiency testing was last conducted by Ardagh on February 26 through February 28, 2014.

4.3. Monitoring and Recordkeeping Requirements

4.3.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

4.3.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.3.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

- 4.3.4. The permittee shall maintain records of the amount and type of coatings, cleaners, pastes and thinners used and VOC and HAP emissions for the coating lines. VOC and HAP emissions shall be calculated using the minimum required control and capture efficiencies as outlined in this permit. Said records shall be maintained on a monthly and 12 month rolling total basis.
- 4.3.5 The permittee shall install, calibrate, maintain, and continuously operate a device(s) to measure and record each of the pollution control devices' combustion chamber temperatures. All temperature records shall be retained on-site for a period of at least five (5) years and shall be made available to the Secretary or his duly authorized representative upon request. The device for 2C shall have an accuracy of ± 2.5 °C (± 4.5 °F) or ± 0.75 percent of the temperature being measured expressed in degree Celsius. The devices for 1C and 3C shall be certified by the manufacturer to be accurate within plus or minus 1% in degrees Fahrenheit.
- 4.3.6 The permittee shall maintain records of the amount of natural gas burned in the thermal oxidizers. Said records shall be maintained on a monthly and 12 month rolling total basis.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name and Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

- ¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.