



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

K003

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OHIO EPA
NEW YORK

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Hancock County
Application No: 03-0642
SYNTHETIC MINOR
NETTING

CERTIFIED MAIL

December 23, 1997

BALL METAL BEVERAGE CONTAINER GROUP
TIM CASE
9300 WEST 108TH CIRCLE
BROOMFIELD, CO 80021

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
NORTHWEST DISTRICT OFFICE, DAPC

George V. Volnovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 03-0642
APS Premise No. 0332000023
Permit Fee: \$600.00

Name of Facility: BALL METAL BEVERAGE CONTAINER GROUP

Person to Contact: TIM CASE

Address: 9300 WEST 108TH CIRCLE
BROOMFIELD, CO 80021

Location of proposed source(s): 12340 TOWNSHIP ROAD #99 EAST
FINDLAY, OHIO

Description of proposed source(s):
MODIFICATION OF CAN LINE #3: CONVERSION FROM 2-PIECE ALUMINUM
BEVERAGE CANS TO 2-PIECE STEEL FOOD CANS.

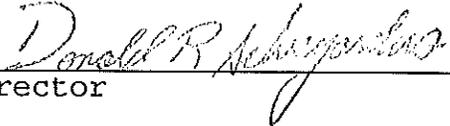
Date of Issuance: December 23, 1997

Effective Date: December 23, 1997

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

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may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for BALL METAL BEVERAGE CONTAINER GROUP located in Hancock County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K003 (Modification)	2-Piece steel food can manufacturing line	Compliance with Permit Allowable Emission Rate	3745-31-05 3745-21-09 (D) (1) (c) 3745-17-11 3745-17-07 3745-23	63.10 pounds VOC/hour (includes cleanup) 1.06 pounds PM/hr <u>Internal Coating:</u> 4.2 pounds of VOC per gallon coating minus water and exempt solvents; <u>N.G. Emissions:</u> 0.06 pound VOC/hour; 1.08 pounds NO _x /hour

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	196.41
NO _x	4.71
PM	4.60

(Net facility VOC increase = 37.38 TPY)

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

INTRODUCTION

Ball Metal has modified Can Line #3 (emissions unit K003) from a two-piece aluminum beverage can line to a two-piece steel food can line*. Ball Metal Container Group is considered a major facility for PSD. However, this modification will only result in a facility VOC increase of 37.38 tons per year. Therefore, PSD will not be triggered. Additionally, emissions unit K003 is no longer subject to the requirements of 40 CFR Part 60 Subpart WW because it is a steel food container manufacturing line rather than an aluminum beverage can manufacturing line.

- * The conversion of emissions unit K003 from an aluminum beverage can line to a steel food can line was previously permitted under PTI No. 03-9417. However, adjustments have been made to the estimated maximum emissions based

on a higher production and raw material feed rate. Therefore, a permit modification has been requested by the company to revise the emission limits.

A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS

1. The volatile organic compound (VOC) emissions from the application of coating and cleanup materials shall not exceed 63.10 pounds per hour.
2. The volatile organic compound (VOC) content of the coatings employed shall not exceed 4.2 pounds of VOC per gallon of coating, excluding water and exempt solvents from an interior body coating line.
3. The permittee shall not exceed 600 gallons of cleanup material per rolling 12-month period.
4. The combined VOC emissions from the application of coating and cleanup materials in emissions unit K003 shall not exceed 196.16 tons of VOC per year, based upon a rolling 12-month summation of the monthly coating and cleanup material VOC emission rates.

To ensure federal enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month 1	39.00 tons VOC
Months 1-2	54.00 tons VOC
Months 1-3	68.00 tons VOC
Months 1-4	83.00 tons VOC
Months 1-5	97.00 tons VOC
Months 1-6	112.00 tons VOC
Months 1-7	126.00 tons VOC
Months 1-8	141.00 tons VOC
Months 1-9	155.00 tons VOC
Months 1-10	169.00 tons VOC
Months 1-11	183.00 tons VOC
Months 1-12	196.16 tons VOC

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual limitation for organic compounds shall be based upon a rolling 12-month summation of the monthly emissions.

B. OPERATIONAL RESTRICTIONS

1. This permit allows for the use of the coatings/cleanup material in emissions unit K003 specified by the company in its PTI application number 03-0642. In conjunction with BAT requirements of OAC 3745-31-05, the emission limits were established in accordance with Ohio EPA's

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"Air Toxics Policy" and are based on both the coating formulation data and the emissions unit's design parameters specified in the application. Any of the following changes may be deemed a "modification" to an emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office, Division of Air Pollution Control are required:

- a. any change in the composition of the coatings or cleanup materials or use of new coatings/cleanup materials that would result in the emissions of a more toxic compound that was previously emitted;
 - b. any change in the composition of the coatings or cleanup materials or use of new coatings/cleanup materials that would result in the emissions of any organic compound excluded from the definition of "VOC" in OAC 3745-21-01(B)(6);
 - c. any change to the emissions unit or its exhaust characteristics that would result in an exceedance of the Maximum Acceptable Ground-Level Concentration (MAGLC) of air toxics beyond plant property lines; and,
 - d. any change in an emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC 3745-31-01(J).
2. Each interior coating material employed in emissions unit K003 shall comply with the volatile organic compound content restriction specified in section A.2 of the Additional Special Terms and Conditions of this permit on an "as applied" basis.

C. MONITORING AND RECORDKEEPING REQUIREMENTS

1. To demonstrate compliance with sections A.2 and A.4 of the Additional Special Terms and Conditions of this permit, the permittee shall collect and record the following information each month for emissions unit K003 and maintain the information at the facility for a period of not less than five years:
 - 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. [Note: If the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture];

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- c. the number of gallons (excluding water and exempt solvents) of each coating material employed;
- d. the VOC emission rate from each coating material employed, in pounds per month [(b) x (c)];
- e. the VOC emission rate from all coating material employed, in tons per month [summation of (d)];
- f. the name and identification of each cleanup material employed;
- g. the VOC content of each cleanup material, in pounds per gallon;
- h. the number of gallons of each cleanup material employed;
- i. the VOC emission rate from each cleanup material employed, in pounds per month[(g) x (h)];
- j. the VOC emission rate from all cleanup materials employed, in tons per month [summation of (i)];
- k. the total VOC emission rate from all coating and cleanup materials employed[(e) + (j)]; and,
- l. also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material VOC emission rates for each calendar month.

D. REPORTING REQUIREMENTS

1. The permittee shall submit quarterly written reports summarizing the following:
 - a. any deviations (excursions) from emission limitations and operational restrictions that have been detected by testing, monitoring, and recordkeeping requirements specified in this permit;
 - b. the probable cause of such deviations; and,
 - c. any corrective actions or preventive measures that have been or will be taken.

If no deviations occurred during the calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

The reports shall be submitted 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). All reports shall be submitted to the Northwest District Office.

2. The permittee shall notify the Ohio EPA, Northwest District Office, 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 Northwest District Office within 30 days following the end of the calendar month.
3. The permittee shall also 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.

E. TESTING REQUIREMENTS

1. Compliance Methods Requirements:

Compliance with the emission limitations shall be determined in accordance with the following method(s):

a. Emission Limitation

Interior coating - 4.2 pounds of VOC per gallon, minus water and exempt solvents

Applicable Compliance Method

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks 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.

b. Emission Limitation

63.10 pounds of VOC per hour

Applicable Compliance Method

This hourly limit represents the units "maximum capacity" i.e., its potential to emit based on the maximum hourly coating application rate. Although this permit does not required periodic recordkeeping to verify compliance with this limit, the permittee

shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

c. Emission Limitation

196.41 tons of VOC per year

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section C.1 of the Additional Special Terms and Conditions of this permit.

d. Emission Limitation

1.06 pounds of PM per hour and 4.60 tons PM per year

Applicable Compliance Method

Compliance with the PM emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10). In the absence of Ohio EPA requiring such testing, the permittee may calculate actual PM emission rates for the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) \times (1 - TE) \times (CE)$$

where

E = particulate matter emission rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed.

CE = control efficiency of the control equipment (filters)

e. Emission Limitation

1.08 pounds of NO_x per hour and 4.71 tons of NO_x per year

Applicable Compliance Method

Ohio EPA will assume compliance with the above emission limitations provided that the permittee operates the wash coat oven at 2.5 mmBTU/hour and each burner of the IC oven at 2.75 mmBTU/hour.

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F. MISCELLANEOUS REQUIREMENTS

1. The emission limitations and associated compliance documentation requirements of this permit are federally enforceable.