

Synthetic Minor Determination Permit To Install #14-04822

A. SOURCE DESCRIPTION

Ball Metal has proposed to increase production of Can Line #1 (emissions unit K001). Line #1 is an aluminum beverage container manufacturing operation.

B. FACILITY ATTAINMENT STATUS

Ball Metal is located in Hancock County and is classified as a "major stationary source" because existing coating lines emit greater than 250 tons per year of volatile organic compounds (VOCs). Hancock County is designated attainment for all criteria pollutants.

C. SOURCE EMISSIONS

An increase in VOC emissions of 40 tons per year constitutes a "major modification" and would trigger PSD permitting requirements. As such, Ball Metal has requested federally enforceable limitations to restrict the annual potential to emit from Can Line #1. Limiting emissions to 162.63 tons of VOC per rolling 365-day period will result in an increase of 39.46 tons per year. However, Ball Metal also installed an end module in late 1998 which was not permitted because it qualified for the "de minimus" exemption. Resultant emissions from the end module equate to 0.50 tons of VOC per year.

The modification of Can Line #1, along with the installation of the end module, will result in an overall facility VOC increase of 39.96 tons per year. Thus, PSD permitting requirements will not be triggered.

D. CONCLUSIONS

By restricting annual VOC emissions on a rolling 365-day basis, the terms and conditions of this permit to install will limit the facility's VOC emissions to less than PSD thresholds. Record keeping and excursion reports will be required to ensure compliance.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
HANCOCK COUNTY**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 03-13296

DATE: 10/16/2001

Ball Metal Beverage Container Corp.
Tim Case
9300 West 108th Circle
Broomfield, CO 80021

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA NWDO IN MI



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-13296

Application Number: 03-13296
APS Premise Number: 0332000023
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ball Metal Beverage Container Corp.
Person to Contact: Tim Case
Address: 9300 West 108th Circle
Broomfield, CO 80021

Location of proposed air contaminant source(s) [emissions unit(s)]:
12340 Township Road 99E
Findlay, Ohio

Description of proposed emissions unit(s):
2-Piece Aluminum Beverage Container Manufacturing Line (Modification of PTI 03-05778 issued on 10/17/91) - Modification to increase line speed.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Ball Metal Beverage Container Corp.

Facility ID: 0332000023

PTI Application: 03-13296

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

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, 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.
- 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 of federally enforceable 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 made to the appropriate Ohio EPA District Office or local air agency. 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. See B.10 below if no deviations occurred during the quarter.

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- 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. 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 shall be submitted pursuant to 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 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.

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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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

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applicable requirement in this 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 ORC section 3704.08.
 - 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. 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.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

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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.

6. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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) 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 the requirements of this permit or cannot meet applicable standards.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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9. Construction Compliance Certification

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

10. 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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	162.63*
NOx	7.80
CO	6.57

*** Includes VOC emissions from cleanup materials and natural gas combustion**

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

none

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

none

Ball M
PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K001 - 2-Piece Aluminum Beverage Container Manufacturing Line (Modification of PTI #03-05778 issued on 10/17/91) Modification to increase in line speed.	OAC rule 3745-31-05 (D) OAC rule 3745-31-05 (A)(3)
	OAC rule 3745-17-11 (B)(2) OAC rule 3745-17-07 (A)(1) 40 CFR Part 60 Subpart WW
	OAC rule 3745-21-09 (D)(1)(b)
	OAC rule 3745-21-09 (D)(1)(c)

Ball M

PTI A

Emissions Unit ID: K001

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Applicable Emissions Limitations/Control Measures	
162.63 tons of VOC per rolling 365-day period (See A.I.2.a)	overvarnish coating operation (See A.I.2.e) 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation (See A.I.2.e)
43.20 lbs of VOC/hour	
0.33 lbs of PE/hour; 1.45 tons of PE/year	
1.78 lbs of NOx/hour; 7.80 tons of NOx/year	
1.50 lbs of CO/hour; 6.57 tons of CO/year	
20% opacity as a six-minute average	
See A.2.d	
2.8 pounds of VOC/gallon, excluding water and exempt solvents, from an overvarnish coating line	
4.2 pounds of VOC/gallon, excluding water and exempt solvents, from an interior body coating line	
None (See A.I.2.b)	
None (See A.I.2.c)	
0.46 kilogram of VOC per liter of coating solids from each two-piece can	

Ball M

PTI A

Emissions Unit ID: K001

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2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable limitation for purposes of avoiding PSD:

Annual VOC emissions resulting from the use of coatings, cleanup materials, and natural gas combustion in K001 shall not exceed 162.63 tons per rolling 365-day period.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Input Rates of VOCs (tons)</u>
Month 1	35.00
Months 1-2	46.50
Months 1-3	58.00
Months 1-4	69.50
Months 1-5	81.00
Months 1-6	92.50
Months 1-7	104.00
Months 1-8	115.50
Months 1-9	127.00
Months 1-10	138.50
Months 1-11	150.00
Months 1-12	162.63

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 365-day summation of the daily emissions.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).

2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

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PTI Application: 02-12206

Issued

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Emissions Unit ID: K001

- 2.d** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D), OAC rule 3745-21-09 (D)(1)(b), OAC rule 3745-21-09 (D)(1)(c), and 40 CFR Part 60, Subpart WW.
- 2.e** As per 40 CFR 60.492, no owner or operator shall discharge or cause the discharge of VOC emissions to the atmosphere that exceed the following volume-weighted calendar-month average emissions:
- i. 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation; and
 - ii. 0.46 kilogram of VOC per liter of coating solids from each two-piece can overvarnish coating operation.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1.0 - 9.5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a weekly basis for emissions unit K001 :
 - a. the name and identification of each coating and cleanup material;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
 - c. the VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon;
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the VOC emission rate for each coating and cleanup material, in pounds per week (b x d);
 - f. the total VOC emission rate for all coatings and cleanup materials, in pounds per week (summation of e)
 - g. the amount of natural gas utilized in the washer oven, deco ovens, and IC oven, in million cubic feet per week;
 - h. the VOC emission rate resulting from natural gas combustion, in pounds per week (based on weekly natural gas usage in (f) and AP-42 emission factors).

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- i. the total VOC emissions from coatings, cleanup materials, and natural gas combustion (summation of g + h), in pounds per week;
 - j. the total number of operating days per week;
 - k. the daily VOC emissions, in pounds, (i divided by j);
 - l. the total combined annual emissions of VOC (tons per year) based upon a rolling 365-day summation of the daily VOC emission rates.
 2. In accordance with 40 CFR 60.493(b), the permittee shall use the following procedures each calendar month to demonstrate compliance with the emission limitations specified in section A.I.2.e. The permittee shall determine the VOC content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24, 40 CFR Part 60 - Appendix A.
 - a. Calculate the volume-weighted average for the total mass of VOC per volume of coating solids used during the month for each affected facility, except as provided under paragraph (b)(1)(iv) of 40 CFR 60.493. The volume-weighted average of the total mass of VOC per volume of coating solids used each calendar month will be determined by the following procedures:
 - i. Calculate the mass of VOC used during the calendar month by using Equation (1) in 40 CFR 60.493(b)(1)(I)(A).
 - ii. Calculate the total volume of coating solids used in the calendar month by using Equation (2) in 40 CFR 60.493(b)(1)(I)(B).
 - iii. Calculate the volume-weighted average mass of VOC per volume of solids used during the calendar month by using Equation (3) in 40 CFR 60.493(b)(1)(I)(C).
 - iv. Calculate the volume-weighted average of VOC emissions discharged to the atmosphere during the calendar month by using Equation (4) in 40 CFR 60.493.(b)(1)(ii).
 - b. If each individual coating used has a VOC content equal to or less than the limit specified in section A.I.2.e, the emission unit is in compliance provided no VOC solvents are added to the coating during distribution or application.
3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop

Ball Metal Beverage Container Corp.

PTI Application: 03-13306

Issued**Facility ID: 0332000023**

Emissions Unit ID: K001

across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings and/or deviations of the emission limitations specified in section A.I.2.e. 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.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for VOC and, for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.

V. Testing Requirements

1. The monitoring and recordkeeping requirements specified in section A.III.2 fulfill the initial performance test and thereafter performance tests required each calendar month as specified in 40 CFR 60.493(b).
2. Compliance with the emission limitations in Section A.I.1 shall be determined in accordance with the following methods:
 - a. Emission Limitation
43.20 pounds of VOC per hour

Applicable Compliance Method

The hourly limitation represents the potential to emit* of the emissions unit. Therefore, no monitoring and recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum line speed of 2600 cans per minute and the summation of emissions from the following components of the line:

- i. IC Coating - 31.78 pounds of VOC per hour (based on a VOC content of 0.97 pounds per gallon and a maximum usage rate of 32.76 gallons per hour)

Ball M**PTI A**

Emissions Unit ID: K001

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- ii. Overvarnish - 8.30 pounds of VOC per hour (based on a VOC content of 0.91 pounds per gallon and a maximum usage rate of 9.12 gallons per hour)
 - iii. Inks - 2.31 pounds of VOC per hour (based on an ink usage rate of 0.08 pound per 1000 cans and a maximum weight percent VOC of 18.5%)
 - iv. Cleanup - 0.45 pounds of VOC per hour (based on a VOC content of 6.59 pounds per gallon and a maximum usage rate of 0.068 gallon per hour)
 - v. Natural Gas Combustion - 0.10 pound of VOC per hour (based on 17.8 mmBTU/hr [combined BTU limit from all ovens] and AP-42 emission factors)
- b. Emission Limitation
162.63 tons of VOC per rolling 365-day period (includes VOC emissions from cleanup materials and natural gas combustion)
- Applicable Compliance Method
Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.
- c. Emission Limitation
Interior Coating - 4.2 pounds of VOC per gallon, excluding water and exempt solvents
- Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in section A.III.1 of the terms and conditions of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings.
- d. Emission Limitation
Interior Coating - 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation
- Applicable Compliance Method
Compliance shall be based upon the recordkeeping requirements specified in A.III.2 and A.IV.1 of these terms and conditions.
- e. Emission Limitation
Overvarnish Coating - 2.8 pounds of VOC per gallon, excluding water and exempt solvents
- Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in section

Emissions Unit ID: K001

A.III.1 of the terms and conditions of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings.

- f. Emission Limitation
Overvarnish Coating - 0.46 kilogram of VOC per liter of coating solids from each two-piece can overvarnish coating operation
- Applicable Compliance Method
Compliance shall be based upon the recordkeeping requirements specified in A.III.2 and A.IV.1 of these terms and conditions.
- g. Emission Limitation
1.78 pounds of NO_x per hour
- Applicable Compliance Method
The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum heat input of 17,800 MMCF/hr by an AP-42 emission factor of 100 lbs/MMCF (AP-42, Section 1.4, Table 1.4-1 [7/98]).
- h. Emission Limitation
7.80 tons of NO_x per year
- Applicable Compliance Method
Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by a conversion factor of 2000 lbs per ton.
- i. Emission Limitation
1.50 pounds of CO per hour
- Applicable Compliance Method
The permittee shall demonstrate compliance with the hourly emission limitation by multiplying the maximum heat input of 17,800 MMCF/hr by an AP-42 emission factor of 84 lbs/MMCF (AP-42, Section 1.4, Table 1.4-2 [7/98]).
- j. Emission Limitation
6.57 tons of CO per year
- Applicable Compliance Method
Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by a conversion factor of 2000 lbs per ton.
- k. Emission Limitation

Ball M

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

0.33 pounds of PE per hour

Applicable Compliance Method

Compliance with the hourly particulate emission limitation shall be demonstrated by utilizing the following equation:

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

Where:

E = particulate emission rate (lbs/hr)

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

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A-Method 5.

- l. Emission Limitation
1.45 tons of PE per year

Applicable Compliance Method

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by a conversion factor of 2000 lbs per ton.

- m. Emission Limitation
20% opacity as a six-minute average

Applicable Compliance Method

Method 9 of 40 CFR Part 60, Appendix A

VI. Miscellaneous Requirements

None

Ball M

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
K001 - 2-Piece Aluminum Beverage Container Manufacturing Line (Modification of PTI #03-05778 issued on 10/17/91) Modification to increase in line speed.	None	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install for this emissions unit 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):

Ball Metal Beverage Container Corp.

PTI Application: 03-13306

Issued**Facility ID: 0332000023**

Emissions Unit ID: K001

Pollutant: 2-Butoxyethanol

TLV (mg/m3): 96.66

Maximum Hourly Emission Rate (lbs/hr): 0.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.40

MAGLC (ug/m3): 2301.43

Pollutant: Formaldehyde

TLV (mg/m3): 0.27

Maximum Hourly Emission Rate (lbs/hr): 0.224

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.087

MAGLC (ug/m3): 6.0

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

Ball M

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-13296 Facility ID: 0332000023

FACILITY NAME Ball Metal Beverage Container Corp.

FACILITY DESCRIPTION Metal Can Production CITY/TWP Findlay

SIC CODE 3411 SCC CODE 4-02-017-35 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION 2-Piece Aluminum Beverage Container Manufacturing Line

DATE INSTALLED To be modified upon issuance of this PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.33 lb/hour	1.45	0.33 lb/hour	1.45
PM ₁₀	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment	43.20 lbs/hour	162.63	43.20 lbs/hour	162.63
Nitrogen Oxides	Attainment	1.78 lbs/hour	7.80	1.78 lbs/hour	7.80
Carbon Monoxide	Attainment	1.50 lbs/hour	6.57	1.50 lbs/hour	6.57
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? WW

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with permit allowable emission rates and Ohio EPA's Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: 2-Butoxyethanol, Formaldehyde**Please describe any hard copy information being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

NONE

Please provide any additional permit specific notes as you deem necessary:

NONE

Permit To Install Synthetic Minor Write-Up**A.SOURCE DESCRIPTION**

NEW SOURCE REVIEW FORM B

PTI Number: 03-13296

Facility ID: 0332000023

FACILITY NAME Ball Metal Beverage Container Corp.

FACILITY DESCRIPTION Metal Can Production

CITY/TWP Findlay

Ball Metal has proposed to increase production of Can Line #1 (emissions unit K001). Line #1 is an aluminum beverage container manufacturing operation.

B.FACILITY ATTAINMENT STATUS

Ball Metal is located in Hancock County and is classified as a "major stationary source" because existing coating lines emit greater than 250 tons per year of volatile organic compounds (VOCs). Hancock County is designated attainment for all criteria pollutants.

C.SOURCE EMISSIONS

An increase in VOC emissions of 40 tons per year constitutes a "major modification" and would trigger PSD permitting requirements. As such, Ball Metal has requested federally enforceable limitations to restrict the annual potential to emit from Can Line #1. Limiting emissions to 162.63 tons of VOC per rolling 365-day period will result in an increase of 39.46 tons per year. However, Ball Metal also installed an end module in late 1998 which was not permitted because it qualified for the "de minimus" exemption. Resultant emissions from the end module equate to 0.50 tons of VOC per year.

The modification of Can Line #1, along with the installation of the end module, will result in an overall facility VOC increase of 39.96 tons per year. Thus, PSD permitting requirements will not be triggered.

D.CONCLUSIONS

By restricting annual VOC emissions on a rolling 365-day basis, the terms and conditions of this permit to install will limit the facility's VOC emissions to less than PSD thresholds. Record keeping and excursion reports will be required to ensure compliance.

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	162.63*
NOx	7.80
CO	6.57

* Includes VOC emissions from cleanup materials and natural gas combustion

NEW SOURCE REVIEW FORM B

PTI Number: 03-13296

Facility ID: 0332000023

FACILITY NAME Ball Metal Beverage Container Corp.

FACILITY DESCRIPTION Metal Can Production

CITY/TWP Findlay