

DRAFT/PROPOSED CAAPP PERMIT  
10/9/2014

Attention:

Silgan Containers Manufacturing Corporation  
Attn: Dean LaClair  
400 North 15<sup>th</sup> Street  
Rochelle, IL 61068

State of Illinois

CLEAN AIR ACT PERMIT  
PROGRAM (CAAPP) PERMIT

[Title V Permit]

Source:

Silgan Containers Manufacturing Corporation  
400 North 15<sup>th</sup> Street  
Rochelle, IL 61068

I.D. No.: 141805AAF  
Permit No.: 95120230

Permitting Authority:

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
217/785-1705

**CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT**

[Title V Permit]

Type of Application: Renewal

Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 141805AAF

Permit No.: 95120230

Statement of Basis No.: 95120230-1409

Date Application Received: July 16, 2013

Date Issued: TBD

Expiration Date: Five Years from Date Issued

Renewal Submittal Date: 9 Months Prior to Expiration Date

Source Name: Silgan Containers Manufacturing Corporation

Address: 400 North 15<sup>th</sup> Street

City: Rochelle

County: Ogle

ZIP Code: 61068

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Jacob Nutt at 217/785-1705.

Raymond Pilapil, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

ECB:MTR:JDN:jws

cc: IEPA, Permit Section  
IEPA, FOS, Region 1  
Lotus Notes Database

<u>Section</u>	<b>Table of Contents</b>	<u>Page</u>
<b>1</b>	<b>Source Information</b>	<b>3</b>
	1.1 Addresses	
	1.2 Contacts	
	1.3 Single Source	
<b>2</b>	<b>General Permit Requirements</b>	<b>4</b>
	2.1 Prohibitions	
	2.2 Emergency Provisions	
	2.3 General Provisions	
	2.4 Testing	
	2.5 Recordkeeping	
	2.6 Certification	
	2.7 Permit Shield	
	2.8 Title I Conditions	
	2.9 Reopening and Revising Permit	
	2.10 Emissions Trading Programs	
	2.11 Permit Renewal	
	2.12 Permanent Shutdown	
	2.13 Startup, Shutdown, and Malfunction	
<b>3</b>	<b>Source Requirements</b>	<b>12</b>
	3.1 Applicable Requirements	
	3.2 Applicable Plans and Programs	
	3.3 Title I Requirements	
	3.4 Synthetic Minor Limits	
	3.5 Reporting Requirements	
<b>4</b>	<b>Emission Unit Requirements</b>	<b>16</b>
	4.1 Coating Lines	
	4.2 End Liner/Tab Lube/Tanks	
<b>5</b>	<b>Additional Title I Requirements</b>	<b>26</b>
<b>6</b>	<b>Insignificant Activities Requirements</b>	<b>27</b>
	6.1 Insignificant Activities Subject to Specific Regulations	
	6.2 Insignificant Activities in 35 IAC 201.210(a)	
	6.3 Insignificant Activities in 35 IAC 201.210(b)	
	6.4 Applicable Requirements	
	6.5 Compliance Method	
	6.6 Notification Requirements for Insignificant Activities	
<b>7</b>	<b>Other Requirements</b>	<b>30</b>
	7.1 Testing	
	7.2 PM Process Weight Rate Requirements	
	7.3 40 CFR 60 Subpart A Requirements (NSPS)	
	7.4 Compliance Assurance Monitoring (CAM) Requirements	
<b>8</b>	<b>State Only Requirements</b>	<b>40</b>
	8.1 Permitted Emissions for Fees	
<b>Attachment 1</b>	<b>List of Emission Units at This Source</b>	<b>41</b>
<b>Attachment 2</b>	<b>Acronyms and Abbreviations</b>	<b>42</b>
<b>Attachment 3</b>	<b>Contact and Reporting Addresses</b>	<b>44</b>
<b>Attachment 4</b>	<b>Example Certification by a Responsible Official</b>	<b>45</b>

**Section 1 - Source Information**

**1. Addresses**

**Source**

Silgan Containers Manufacturing Corporation  
 400 North 15<sup>th</sup> Street  
 Rochelle, IL 61068

**Owner**

Silgan Containers Manufacturing Corporation  
 21800 Oxnard Street, Suite 600  
 Woodland Hills, CA 91367

**Operator**

Silgan Containers Manufacturing Corporation  
 400 North 15<sup>th</sup> Street  
 Rochelle, IL 61068

**Permittee**

The Owner and Operator of the source as identified in this table.

**2. Contacts**

**Certified Officials**

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Dean LaClair	Plant Manager
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

**Other Contacts**

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Johnathan Kania	262-569-5857	jkania@silgancontainers.com
<i>Technical Contact</i>	Johnathan Kania	262-569-5857	jkania@silgancontainers.com
<i>Correspondence</i>	Johnathan Kania	262-569-5857	jkania@silgancontainers.com
<i>Billing</i>	Johnathan Kania	262-569-5857	jkania@silgancontainers.com

**3. Single Source**

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

## Section 2 - General Permit Requirements

### 1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

### 2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
  - i. An emergency occurred and the source can identify the cause(s) of the emergency.
  - ii. The source was at the time being properly operated.
  - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
  - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this 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 preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

**3. General Provisions**

**a. Duty to Comply**

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

**b. Need to Halt or Reduce Activity is not a Defense**

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

**c. Duty to Maintain Equipment**

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

**d. Disposal Operations**

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

**e. Duty to Pay Fees**

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

**f. Obligation to Allow IEPA Surveillance**

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

- i. Enter upon the source's premises where the emission unit(s) are located or 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.
- 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. Sample or monitor any substances or parameters at any location at reasonable times:
  - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
  - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

**g. Effect of Permit**

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
  - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
  - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
  - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
  - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

**h. Severability Clause**

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

**4. Testing**

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. **Testing by Owner or Operator:** The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
  - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

**5. Recordkeeping**

**a. Control Equipment Maintenance Records**

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

**b. Retention of Records**

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

**c. Availability of Records**

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

**6. Certification**

**a. Compliance Certification**

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
  - A. The identification of each term or condition of this permit that is the basis of the certification.
  - B. The compliance status.
  - C. Whether compliance was continuous or intermittent.
  - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

**b. Certification by a Responsible Official**

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

**7. Permit Shield**

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after \_\_\_\_\_ (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

**8. Title I Conditions**

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
  - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
  - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

## 9. Reopening and Revising Permit

### a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

### b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

### c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

### d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

## 10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

## 11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

**12. Permanent Shutdown**

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

**13. Startup, Shutdown, and Malfunction**

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

## Section 3 - Source Requirements

### 1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

#### a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

#### b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

#### c. Asbestos Demolition and Renovation

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

**d. Future Emission Standards**

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

**2. Applicable Plans and Programs**

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

**a. Fugitive PM Operating Program**

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

**b. PM<sub>10</sub> Contingency Measure Plan**

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM<sub>10</sub> Contingency Measure Plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM<sub>10</sub> Contingency Measure Plan.

**c. Episode Action Plan**

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.

- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on 07-01-2009, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO2, PM10, NO2, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

**d. Risk Management Plan (RMP)**

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

**3. Title I Requirements**

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

**4. Synthetic Minor Limits**

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
  - I. Requirements in Conditions 3.1(a)(i), 3.1(b), and 3.1(d).
  - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

**b. Semiannual Reporting**

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

**c. Annual Emissions Reporting**

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

**Section 4 - Emission Unit Requirements**

**4.1 Coating Lines**

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
<b>Unit #1</b>					
Sheet 1	VOM, PM	Pre 1993	N/A	Munter Concentrator, Ross RCO	Thermocouple, Magnahelic Gauge
Drying Oven (Wagner 3.7 mmBtu)	SO <sub>2</sub> , CO, VOM	Pre 1993	N/A		
Sheet 2	VOM, PM	Pre 1993	N/A		
Drying Oven (Wagner 3.7 mmBtu)	SO <sub>2</sub> , CO, VOM	Pre 1993	N/A		
Sheet 3	VOM, PM	2001	N/A		
<b>Unit #2</b>					
Post Coaters 1	VOM, PM	2001	N/A	M&W Concentrator, Stealth RCO	Thermocouple, Magnahelic Gauge
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2001	N/A		
Post Coaters 2	VOM, PM	2001	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2001	N/A		
Post Coaters 3	VOM, PM	2001	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2001	N/A		
Post Coaters 4	VOM, PM	2001	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2001	N/A		
Post Coaters 5	VOM, PM	2001	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2001	N/A		
Post Coaters 6	VOM, PM	2001	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2001	N/A		
Post Coaters 7	VOM, PM	2001	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2001	N/A		
<b>Unit #3</b>					
Post Coaters 8	VOM, PM	2002	N/A	PEI RTO	Thermocouple, Magnahelic Gauge
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
Post Coaters 9	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
Post Coaters 10	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
Post Coaters 11	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
Post Coaters 12	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

**Section 4 - Emission Unit Requirements**  
**4.1 -Coating Lines**

Post Coaters 13	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
<b>Unit #4</b>					
Post Coaters 14	VOM, PM	2002	N/A	Tann RTO	Thermocouple, Magnahelic Gauge
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
Post Coaters 15	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
Post Coaters 16	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		
Post Coaters 17	VOM, PM	2002	N/A		
Drying Oven (0.232 mmBtu)	SO <sub>2</sub> , CO, VOM	2002	N/A		

**2. Applicable Requirements**

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. i. Opacity Requirements**

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on RTO and RCO control devices in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the process, maintenance and repair and/ or adjustment of fuel usage. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

**b. i. Particulate Matter Requirements (PM)**

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit for which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, which, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c) (See Condition 7.2).

ii. Compliance Method (PM Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(b) and (d) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months as a running 12 month total.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of PM emissions with supporting calculations (lb/hr and tons/yr).

**c. i. Volatile Organic Material Requirements (VOM)**

A. Pursuant to 35 IAC 215.204, coating lines with emissions of VOM from sources subject to 35 IAC 215.204, are allowable, notwithstanding the limitations in 35 IAC 215.204, if the emissions are controlled by an afterburner system which provides:

- I. 75% reduction in the overall emissions of VOM from the coating line; and
- II. Oxidation to carbon dioxide and water of 90% of the nonmethane volatile organic material (measured as total combustible carbon) which enters the afterburner.

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the sheet coaters and post repair spray operations are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.1 and Table 7.1.A, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Testing

B. Pursuant to 35IAC 215.102, the Permittee upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with procedures of 35 IAC 215.102 to measure the overall control and performance of an thermal oxidizer controlling the coating lines including the associated capture

system. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. Overall control includes measurement of capture efficiency of all lines and the efficiency of the concentrator.

- C. Pursuant to 35IAC 215.208(a), If the Permittee shall annually test the VOM content of each coating applied on the coating line shall be determined by using Method 24 of 40 CFR 60, Appendix A. Any alternative test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative method will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative. These tests may be performed by the supplier of the coating provided that the coatings are not diluted with organic solvent before use. If this option is chosen then the requirements of Condition 7.1.5 for the control system do not apply. See Condition 4.1.5 for notification requirements if this option is chosen.
- D. The Permittee shall comply with all the requirements of Section 7.1.

Recordkeeping

- E. In addition to the records required by Condition 2.5, the Permittee shall maintain records of the following items for the sheet coaters and post repair spray operations to demonstrate compliance with Conditions 4.1.2, and 4.1.5, pursuant to Section 39.5(7)(b) of the Act:
  - I. The name and identification number of each coating, ink, thinner/thinning solvent and clean-up solvent as applied on each coating line;
  - II. Usage of each VOM containing material applied on the coating line (gallons/month and gallons/year);
  - III. VOM content of each such material (lb/gallon, less water);
  - IV. Density of each applied VOM containing material (lb/gallon);
  - V. The usage of clean-up solvent (gallons/month and gallons/year);
  - VI. Records of natural gas usage (mscf/month and mscf/year);
  - VII. Total VOM emissions (tons/month and tons/year) calculated based on the recordkeeping requirements.
  - VIII. Total emissions from the natural gas combustion (tons/month and tons/year) calculated based on the recordkeeping requirements along with compliance procedures from Condition 7.1.12; and
  - IX. Records for Compliance Assurance Monitoring (CAM) Requirements. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements in Condition 4.1.2(b)(ii)(A), as required by 40 CFR 64.9(b)(1).

D. i. Sulfur Dioxide Requirements (SO<sub>2</sub>)

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from the coating line ovens and associated thermal oxidizers to exceed 2000 ppm.
- ii. Compliance Method (SO<sub>2</sub> Requirements)
- Monitoring
- A. Pursuant to 39.5(7)(a) of the Act, the Permittee shall use pipeline quality natural gas or natural gas certified by gas supplier that sulfur dioxide emissions in the flue gases will not exceed 2000 ppm shall be fired in the coating line ovens or the associated thermal oxidizers.
- Recordkeeping
- B. Pursuant to Section 39.5(7)(b) and (e) of the Act the Permittee shall maintain records of:
- I. The hours of operation of the ovens and associated thermal oxidizers. (hours/month)
- II. Type and quantity of fuel fired in the ovens and associated thermal oxidizers. (mmcf/month)
- III. Certification documents from the gas supplier.

### **3. Non-Applicability Determinations**

- a. This permit is issued based on the coating lines not being subject to 35 IAC 215.301 and 215.302, pursuant to 35 IAC 215.209.
- b. This permit is issued based on the coating line not being subject to 40 CFR Part 60, Subpart WW "Standards of Performance for the Beverage Can Coating Industry", because no beverage can coating is performed at this location.
- c. The coating lines are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.
- d. The coating lines are not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.
- e. The Sheet Lines and Post Coaters are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the Sheet Lines and Post Coaters do not have potential pre-control device emissions of PM that equals or exceeds major source threshold levels.

### **4. Operational Flexibility requirements**

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

#### **a. Operational Flexibility Requirements**

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

- i. Pursuant to 35 IAC 201.102. The Permittee is authorized to make the following physical or operational change with respect to the sheet coaters and post repair spray operations without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source.
  - A. Changes in the coatings and clean-up solvents used, provided that the sheet coaters and post repair spray operation continues to comply with all emission limitations and standards of this subsection.

## 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.1.2(a)(i), and 4.1.2(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

4.2 End Liners/Tab Lube/Tanks

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Press Line #1	VOM, PM	2001	N/A	None	Thermocouple, Magnahelic Gauge
Press Line #2	VOM, PM	2001	N/A		
Press Line #3	VOM, PM	2001	N/A		
Press Line #4	VOM, PM	2001	N/A		
Press Line #7	VOM, PM	2006	N/A		
Press Line #5	VOM, PM	2012	N/A		
Press Line #8	VOM, PM	2013	N/A		
Bulk Coating Tank #1	VOM, PM	2001	N/A		
Bulk Coating Tank #2	VOM, PM	2001	N/A		
Bulk Coating Tank #3	VOM, PM	2006	N/A		
Post Coater Epoxy Tank	VOM, PM	2001	N/A		
Post Coater Polyamide Tank	VOM, PM	2006	N/A		

**2. Applicable Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. i. Opacity Requirements**

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

**ii. Compliance Method (Opacity Requirements)**

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the press line in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the process, maintenance and repair and/ or adjustment of fuel usage. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which emission units was observed,

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

**b. i. Volatile Organic Material Requirements (VOM)**

- A. Pursuant to 35 IAC 215.204 (b)(6) and 35 IAC Part 215, the Permittee of a coating line shall not cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material, delivered to the coating applicator.

	kb/l	lb/gal
End Sealing Compound Coat	0.44	3.7

- B. Pursuant to 35 IAC 212.321 Subpart L, the Permittee shall use the methods in attachment 2 to calculate allowable emissions for each conversion press, tab lube and end liner.
- C. Pursuant to 35 IAC 215.301, The conversion presses and tab lube operation are subject to 35 IAC Part 215, Subpart K, Use of Organic Material: The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of volatile organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of Subpart K shall apply only to photochemically reactive material as defined in 211.4690.
- D. Pursuant to 35 IAC 215.122(b), The Permittee shall use a submerged pipe to fill the storage tanks if the tank has a capacity greater than 250 gallons and is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

**ii. Compliance Method (VOM Requirements)**

**Monitoring**

- A. Pursuant to 35 IAC 215.122(b), If any of the storage tanks store a material with a vapor pressure over 2.5 psia at 70°F then the submerged pipe shall be inspected every other year.

**Testing**

- B. Pursuant to 35 IAC 215.208(a), the Permittee shall on an annual basis test the VOM content of each end liner compound applied on the coating lines shall be determined by using Method 24 of 40 CFR 60, Appendix A. Any alternative test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative method will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative. These tests may be conducted by the supplier of the end compound unless they are diluted on site before application.

C. The Permittee shall comply with all the requirements of Section 7.1.

Recordkeeping

- D. Pursuant to section 39.5(7)(b) and (d) of the Act, In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the end liners, conversion presses and storage tank to demonstrate compliance with the following:
- I. The name and identification number of each coating, mister, tab lube and clean-up solvent as applied on the end liners and conversion presses. If the coatings that must comply with Condition 7.2.3(e) are diluted on site with organic solvent then records of the dilution ratio must be kept;
  - II. Usage of each VOM containing material applied on the end liners and conversion presses (gallons/months and gallons/year);
  - III. If the VOM content of the tab lube or "mister" classify the emissions as photochemically reactive, the hourly VOM emission rate shall be used.(each individual hour is not necessary if the typical emission rate can be shown to be below 8 lb/hr);
  - IV. VOM content of each such material (lb/gallon, less water) either from formulation data by the supplier or from the special tests required by Condition 7.2.8;
  - V. Density of each applied coating and clean-up solvents (lb/gal);
  - VI. The usage of clean-up solvent (gal/month and gal/year);
  - VII. Amount of VOM-containing materials sent offsite for recovery and the VOM content of the material if appreciably different from the raw material (gal/month and wt. percent); and
  - VIII. Total VOM emissions (tons/month and tons/year) calculated based on the recordkeeping requirements along with compliance procedures from Condition 7.2.12.
  - IX. Record of biannual inspection of submerged pipe if the vapor pressure of the material in the end compound storage tank is over 2.5 psia.

**3. Non-Applicability Determinations**

- a. This permit is issued based on the end liners not being subject to the New Source Performance Standards (NSPS) for the Beverage Can Surface Coating Industry, 40 CFR Part 60, Subpart WW, because the end liner is not a beverage can coating line.
- b. Pursuant to 35 IAC 215.209, No owner or operator of a coating line (i.e. the end liners) subject to the limitations of 35 IAC 215.204 is required to meet the limitations of 35 IAC Part 215, Subpart K (35 IAC 215.301 or 215.302), after the date by which the coating line is required to meet 35 IAC 215.204.
- c. This permit is issued based on the conversion presses, tab lube operation, "misting" operation, and end liners not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the conversion presses, tab lube operation, "misting" operation, and end liners do not use an add-on control device to achieve compliance with an emission limitation or standard.

**4. Other Requirements**

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. Operational Flexibility Requirements**

- i. Pursuant to 35 IAC 201.102, The Permittee is authorized to make the following physical or operational change with respect to the affected end liners, conversion presses and storage tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source.
  - A. Changes in the materials used and the products produced on the affected end liners as long as these emission units continue to comply with all emission limitations and requirements of this subsection.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.2.2(a)(i), and 4.2.2(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**Section 5 - Additional Title I Requirements**

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

**Section 6 - Insignificant Activities Requirements**

**1. Insignificant Activities Subject to Specific Regulations**

This condition is reserved for insignificant activities, as defined in 35 IAC 201.210 and 201.211, which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

**2. Insignificant Activities in 35 IAC 201.210(a)**

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Video Marking Units	34	35 IAC 201.210(a)(1) and 201.211
Solvent Storage Tank	1	35 IAC 201.210(a)(1) and 201.211
Old Compound Day Tank	1	35 IAC 201.210(a)(1) and 201.211
Tab Lube Tank	1	35 IAC 201.210(a)(1) and 201.211
Scrap Handling System With Cyclone	6	35 IAC 201.210(a)(2) or (a)(3)
UV Litho Coating Line	1	35 IAC 201.210(a)(2) or (a)(3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	45	35 IAC 201.210(a)(4)

**3. Insignificant Activities in 35 IAC 201.210(b)**

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

**4. Applicable Requirements**

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

- d. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 215.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- e. Pursuant to 35 IAC 215.182, for each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, except as provided in 35 IAC 215.181.

**5. Compliance Method**

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

**6. Notification Requirements for Insignificant Activities**

The source shall notify the IEPA accordingly to the addition of insignificant activities:

**a. Notification 7 Days in Advance**

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
  - A. A description of the emission unit including the function and expected operating schedule of the unit.
  - B. A description of any air pollution control equipment or control measures associated with the emission unit.
  - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
  - D. The means by which emissions were determined or estimated.
  - E. The estimated number of such emission units at the source.
  - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

**b. Notification Required at Renewal**

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

**c. Notification Not Required**

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

## Section 7 - Other Requirements

### 1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
  - i. The name and identification of the emission unit(s) being tested.
  - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
  - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
  - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
  - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
  - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.5(7)(a) of the Act as follows:
  - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
  - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.5(7)(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
  - ii. A summary of results.
  - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
  - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
  - v. Detailed description of test conditions, including:
    - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
    - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
    - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
  - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
  - vii. An explanation of any discrepancies among individual tests or anomalous data.
  - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
  - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
  - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

**2. PM Process Weight Rate Requirements**

**a. New Process Emission Units - 35 IAC 212.321**

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)  
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54  
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8  
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

**b. Existing Process Emission Units - 35 IAC 212.322**

Existing Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322].

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

**Section 7 - Other Requirements**  
**7.2 - PM Process Weight Rate Requirements**

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c)). See Condition 7.2(b)(iii) below. [35 IAC 212.322(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.322(c) shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

Where:

P = Process weight rate (T/hr)  
 E = Allowable emission rate (lbs/hr)

- A. Process weight rates of less than 450 T/hr:

A = 4.10  
 B = 0.67  
 C = 0

- B. Process weight rates greater than or equal to 450 T/hr:

A = 55.0  
 B = 0.11  
 C = -40.0

- iii. Limits for Existing Process Emission Units [35 IAC 212.322(c)]:

<u>P</u> (T/hr)	<u>E</u> (lbs/hr)	<u>P</u> (T/hr)	<u>E</u> (lbs/hr)
0.05	0.55	25.00	35.40
0.10	0.87	30.00	40.00
0.2	1.40	35.00	41.30
0.30	1.83	40.00	42.50
0.40	2.22	45.00	43.60
0.50	2.58	50.00	44.60
0.75	3.38	100.00	51.20
1.00	4.10	150.00	55.40
2.00	6.52	200.00	58.60
3.00	8.56	250.00	61.00
4.00	10.40	300.00	63.10
5.00	12.00	350.00	64.90
10.00	19.20	400.00	66.20
15.00	25.20	450.00	67.70
20.00	30.50	500.00	69.00

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

**3. Compliance Assurance Monitoring (CAM) Requirements**

**a. CAM Provisions**

i. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

iii. Response to Excursions or Exceedances

A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

**b. Monitoring - Monitoring**

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 7.3(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

**c. Monitoring - Recordkeeping**

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

**d. Monitoring - Reporting**

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).

**e. CAM Plans**

The following tables contain the CAM Plans in this CAAPP permit:

Table	Emission Unit Section	PSEU Designation	Pollutant
7.1.1	4.1	Unit 1	VOM
7.1.2	4.1	Unit 2	VOM
7.1.2	4.1	Unit 3	VOM
7.1.3	4.1	Unit 4	VOM

**Table 7.1.1 - CAM Plan**

Emission Unit Section:	4.1
PSEU Designation:	Unit 1
Pollutant:	VOM

Indicators:	#1) Combustion Chamber Temp	#2) Conc. Differential Pressure
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Combustion chamber temperature is measured via thermocouple	Magnehelic gauge and/or pressure switch
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Temperature must be maintained above 1400 F during operation.	Differential pressure across concentrator rotor, -0.88 to -0.71 WC per Manufacturer's Specifications.
Quality Improvement Plan (QIP) Threshold Levels:	N/A	N/A
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	Two thermocouples both in the combustion chamber within 5 feet of the burner. One thermocouple sends data to the PLC and chart recorder the other controls the interlock.	Representative data is taken by thermocouples in the oxidizer to monitor temperature and magnehelics across ductwork to measure pressure.
Verification Procedures to Confirm the Operational Status of the Monitoring:	The thermocouples will be calibrated and/or replaced a minimum of 1x per year to ensure accuracy.	The pressure sensing devices will be calibrated and/or replaced a minimum of 1x per year to ensure accuracy.
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	The accuracy of the thermocouple will be checked a minimum of 1x per year by calibration.	The accuracy of the pressure drops will be checked a minimum of 1x per year by calibration.
The Monitoring Frequency:	Continuous	1x per day by gauge.
The Data Collection Procedures That Will Be Used:	Continuous by paper chart recorder or electronic recorder.	1x/shift or a minimum of 2 times daily
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	One-hour averaging period	One-hour averaging period

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

**Table 7.1.2 - CAM Plan**

Emission Unit Section:	4.1
PSEU Designation:	Unit 2
Pollutant:	VOM

Indicators:	#1) Combustion Chamber Temp	#2) Exhaust Fan Pressures
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Combustion chamber temperature is measured via thermocouple	Magnehelic gauge and/or pressure switch
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Temperature must be maintained above 1400 F during operation. Set point is 1440 F.	Establish exhaust fan pressures during compliance test to ensure capture.
Quality Improvement Plan (QIP) Threshold Levels:	N/A	N/A
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	Three Thermocouples in the combustion chamber near burner. One is set for temp, One is spare, one is for the interlock. (TE1A, TE1B, TE1C). Temperature is sent to a circle chart.	Representative data is taken by thermocouples in the oxidizer to monitor temperature and magnehelics across ductwork to measure pressure.
Verification Procedures to Confirm the Operational Status of the Monitoring:	The thermocouples will be calibrated and/or replaced a minimum of 1x per year to ensure accuracy.	The pressure sensing devices will be calibrated and/or replaced a minimum of 1x per year to ensure accuracy.
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	The accuracy of the thermocouple will be checked a minimum of 1x per year by calibration.	The accuracy of the monitoring equipment will be checked a minimum of 1x per year by calibration.
The Monitoring Frequency:	Continuous	Continuous
The Data Collection Procedures That Will Be Used:	Continuous by paper chart recorder or electronic recorder.	Continuous by paper chart recorder or electronic recorder.
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	One-hour averaging period	One-hour averaging period

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

**Table 7.1.3 - CAM Plan**

Emission Unit Section:	4.1
PSEU Designation:	Unit 3
Pollutant:	VOM

Indicators:	#1) Combustion Chamber Temp	#2) Inlet Fan Pressure
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Combustion chamber temperature is measured via thermocouple	Magnehelic gauge and/or pressure switch
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Temperature must be maintained above 1425 F during operation. Set point is 1500 F.	Process Inlet Fan differential pressure: -6.0" WC (low), -8.0" WC setpoint, -10.0 (High)
Quality Improvement Plan (QIP) Threshold Levels:	N/A	N/A
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	Three Thermocouples in the combustion chamber near burner. One is set for temp, One is spare, one is for the interlock. (TE1A, TE1B, TE1C). Temperature is sent to a circle chart.	Representative data is taken by thermocouples in the oxidizer to monitor temperature and magnehelics across ductwork to measure pressure.
Verification Procedures to Confirm the Operational Status of the Monitoring:	The thermocouples will be calibrated and/or replaced a minimum of 1x per year to ensure accuracy.	The pressure sensing devices will be calibrated and/or replaced a minimum of 1x per year to ensure accuracy.
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	The accuracy of the thermocouple will be checked a minimum of 1x per year by calibration.	The accuracy of the pressure drops will be checked a minimum of 1x per year by calibration.
The Monitoring Frequency:	Continuous	Continuous
The Data Collection Procedures That Will Be Used:	Continuous by paper chart recorder or electronic recorder.	Continuous by paper chart recorder or electronic recorder.
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	One-hour averaging period	One-hour averaging period

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

**Table 7.1.4 - CAM Plan**

Emission Unit Section:	4.1
PSEU Designation:	Unit 4
Pollutant:	VOM

Indicators:	#1) Combustion Chamber Temp	#2) Inlet Fan Pressure
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Combustion chamber temperature is measured via thermocouple	Magnehelic gauge and/or pressure switch
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	The 1 hour average temperature shall be maintained at or above 1468 F during operation.	Inlet fan differential pressure: -0.1" WC to -10" WC
Quality Improvement Plan (QIP) Threshold Levels:	N/A	N/A
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	Temperature taken from 1 of 4 thermocouples with highest temperature and recorded to Z chart . Two in each chamber located atop of the media bed and canister (TC607, TC1805, TC1807, TC611). PLC interlock.	Representative data is taken by thermocouples in the oxidizer to monitor temperature and magnehelics across ductwork to measure pressure.
Verification Procedures to Confirm the Operational Status of the Monitoring:	The thermocouples are calibrated and/or replaced a minimum of 1x per year.	The pressure sensing device's signal is verified working 1x per year.
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	The thermocouples are calibrated and/or replaced a minimum of 1x per year.	The pressure sensing device's signal is verified working 1x per year.
The Monitoring Frequency:	Monitoring shall be performed at all times when the emissions control system is operating.	N/A
The Data Collection Procedures That Will Be Used:	A continuous recorder will record data with the same accuracy as the temp monitor.	N/A
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Measured data shall be recorded on an hourly average basis.	N/A

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

## Section 8 - State Only Requirements

### 1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	249.41
Sulfur Dioxide	(SO <sub>2</sub> )	0.15
Particulate Matter	(PM)	1.95
Nitrogen Oxides	(NO <sub>x</sub> )	25.65
HAP, not included in VOM or PM	(HAP)	-
Total		277.16

Emission limitations are not set for this source for the purpose of permit fees. The Permittee shall be required to pay the maximum fee, pursuant to Section 39.5(18)(a)(ii)(A) of the Act.

## Attachment 1 - List of Emission Units at This Source

Section	Emission Units	Description
4.1	Coating Lines	<p>In the initial process of making a can, cut metal sheet stock is coated on one or two sides, depending on the raw material and the specification for the can. The coating is applied to the metal surface using an offset type coater. The metal sheets are passed through the coating roller and the backing roller one at a time. The coating roller transfers the coating to the metal sheet as it passes through the rollers. After the metal sheets are printed or coated, they are conveyed into a curing oven where the solvents are evaporated and the coating cured. The VOM emissions released in the oven are exhausted into a regenerative thermal oxidizer (RTO). The sheetfed lithographic printing press feeds to the existing Wagner Coater and existing oven (Line #3). The press will apply coating/inks to metal sheets. The existing coating line will continue to be bottlenecked by its dryer.</p> <p>In the post repair process, ends that have been cut or scored in the conversion press are re-sealed with a coating to protect the contents of a filled container against corrosion. The post repair spray operation is controlled by a new concentrator and an existing thermal oxidizer. The purpose of the concentrators is to convert a high-volume, low-VOM, air stream into a high-VOM, lower-volume exhaust.</p>
4.2	End liners/Tab Lube	<p>Sheets of pre-coated metal are pre-cut using scroll shears to provide blanks that are fed into the End Press Process. The End Presses form metal can ends (lids) by stamp forming and cutting the pre-coated blanks. After forming and cutting, the ends go through End Liners where the channel around the perimeter of each end is filled with an end sealing compound or "end compound". The nozzles that apply end compound must be cleaned/lubricated continuously to prevent compound from adhering to the applicator. The operation is referred to as a "mister".</p> <p>Most of the ends produced by the end presses will be converted to an "easy-open" consumer feature. Lined ends are processed through a conversion presses that scores the end for opening and attaches a pull-tab. Tab lube is used to facilitate forming of the aluminum stock into a pull-tab.</p>

## Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
GACT	Generally Acceptable Control Technology
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
hp	Horsepower
hr	Hour
H <sub>2</sub> S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
kw	Kilowatts
LAER	Lowest Achievable Emission Rate

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD

lbs	Pound
m	Meter
MACT	Maximum Achievable Control Technology
M	Thousand
MM	Million
mos	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PB	Lead
PEMS	Predictive Emissions Monitoring System
PM	Particulate matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Silgan Containers Mfg. Corporation  
 I.D. No.: 141805AAF  
 Permit No.: 95120230

Date Received: 07/16/13  
 Date Issued: TBD

**Attachment 3 - Contact and Reporting Addresses**

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #1</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance &amp; Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p>

**Attachment 4 - Example Certification by a Responsible Official**

**SIGNATURE BLOCK**

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.

I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))

AUTHORIZED SIGNATURE:

BY:

\_\_\_\_\_

\_\_\_\_\_

AUTHORIZED SIGNATURE

TITLE OF SIGNATORY

\_\_\_\_\_

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

TYPED OR PRINTED NAME OF SIGNATORY

DATE

Silgan Containers Mfg. Corporation  
I.D. No.: 141805AAF  
Permit No.: 95120230

Date Received: 07/16/13  
Date Issued: TBD