

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Crown Cork & Seal USA, Inc.
Attn: Hector Murillo
970 West North Street
Warrensburg, Illinois 62573

Application No.: 95110107

I.D. No.: 115050AAI

Applicant's Designation:

Date Received: June 5, 2003

Subject: Metal Can Manufacturing

Date Issued: November 13, 2006

Expiration Date: November 13, 2011

Location: 970 West North Street, Warrensburg, Macon County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of modifications to allow increase operation of 5 Can Lines with ovens as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic materials (VOM) to less than 100 tons/year, total combined hazardous air pollutants (HAPs) to less than 25 tons/year, and any single hazardous air pollutant (HAP) to less than 10 tons/year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - ii. To limit the emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source to less than 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs. As a result of this condition, this permit is issued based on the can coating lines at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESAHP) for Surface Coating of Metal Cans, 40 CFR 63 Subpart KKKK. This is consequence of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs, being established prior to the Compliance Date for existing sources listed in 40 CFR 63.3483(b).
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

- c. This permit supersedes all operating permits issued for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 215.204(b), no owner or operator of a coating line shall 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 pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator.

<u>Can Coating</u>	<u>kg/l</u>	<u>lb/gal</u>
Sheet basecoat and Overvarnish	0.34	(2.8)
Exterior basecoat and overvarnish	0.34	(2.8)
Interior body spray coat	0.51	(4.2)
Exterior end coat	0.51	(4.2)
Side seam spray coat	0.66	(5.5)
End sealing compound coat	0.44	(3.7)

- b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.
- 3. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 4a. Emissions and operation of the 5 can coating lines, including cleanup, at this facility, shall not exceed the following limits:

i. Material Usage:

<u>Material</u>	Material Usage	
	<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>
Coating	775	7,745
Cleanup Solvent	200	2,000

ii. Material Properties:

<u>Material</u>	<u>VOM Content (lb VOM/gal)</u>	<u>Single Hap</u>	<u>Combined HAP</u>
		<u>Content (% by Wt)</u>	<u>Content (% by Wt)</u>
Coating	5.5	0.70	1.20
Cleanup Solvent	7.5	100.00	100.00

iii. Emissions:

<u>Material</u>	<u>VOM</u>		<u>Single HAP</u>		<u>Combined HAPs</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Coating	2.13	21.31	0.02	0.21 ¹	0.04	0.36
Cleanup Solvent	0.75	<u>7.50</u>	0.75	7.50 ²	0.75	<u>7.50</u>
	Total:	28.81			Total:	7.86

¹ Xylene total: 0.21 tons/year

² Glycol Ether total: 7.50 tons/year

These limits are based on maximum usage rates of each material and the maximum material properties (VOM and HAP content) of each material.

- b. Emissions of VOM from the #6 can assembly line shall not exceed the following limits:

<u>VOM Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
0.6	5.9

These limits are based on the maximum material usage and the compliance procedures specified in Condition 9. The above limitations were established in Permit 00040041, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- c. Emissions of volatile organic material (VOM) and operation of can line #3 at this facility, shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Material (Gal/Mo)</u>	<u>Usage (Gal/Yr)</u>	<u>VOM Content (Lbs/Gallon)</u>	<u>VOM Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Can Line #3	367	3,661	5.5	1.04	10.4

These limits are based on maximum usage rates of coatings, maximum hours of operation, and maximum allowable VOM content. The above limitations were established in Permit 06070007, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- d. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

- i. Natural gas usage: 3.0 mmscf/mo and 30 mmscf/yr
- ii. Emissions of nitrogen oxide (NO_x), carbon monoxide (CO), volatile organic material (VOM), sulfur dioxide (SO₂), and particulate matter (PM):

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(Lb/mmscf)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
NO _x	100	0.45	1.48
CO	84	0.13	1.25
VOM	5.5	0.01	0.09
SO ₂	0.6	---	0.01
PM	7.6	0.02	0.12

These limits are based on the maximum firing rage, 8760 hours per year, and standard emission factors given by AP-42 tables 1.4-1 and 1.4-2.

- e. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and section 112(g) of the Clean Air Act.
 - f. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
5. Within 90 days of a written request from the Illinois EPA, tests shall be performed which will allow evaluation of the representative coatings "as applied" in order to determine compliance with the requirements of Special Condition Nos. 2 and 4.
- b. These tests shall be performed by an approved independent laboratory by the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 215.105.
- 6a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The

record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. The name and identification number of each coating used;
 - ii. The usage (gallons/month), density (lbs/gallon), VOM and HAP content of each coating (weight percent or lbs/gallon);
 - iii. Natural gas usage (mmscf/month and mmscf/year); and
 - iv. Monthly and annual CO, NO_x, PM, SO₂, VOM and HAP emissions with supporting calculations for the current month and total running for last 12 months (tons/month and tons/year).
 - c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
7. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

8. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

9. To determine compliance with the VOM emission limits established in Condition 4(b) for can coating line #6 shall be based on the recordkeeping requirements in Condition 6(b) and the emission factors and formulas listed below

VOM Emissions (tons) = (Material Usage, gallons) x (VOM Content of Material, lb VOM/gallon)

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:GMK:psj

cc: Illinois EPA, FOS Region 3

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the can coating plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons per year of VOM, 10 tons per years of a single HAP and 25 tons per year of combined HAPs), at which this source would be considered a major source for proposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, coatings used and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						<u>Single HAP</u>	<u>Total HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>			
5 Can Coating Lines	----	----	----	----	28.81	7.50	<u>7.86</u>	
Fuel Combustion	<u>1.25</u>	<u>1.48</u>	<u>0.12</u>	<u>0.01</u>	<u>0.09</u>	----	----	
Totals	1.25	1.47	0.12	0.01	28.90	< 10	< 25	

GMK:psj