

217/782-2113

CONSTRUCTION PERMIT -- REVISED

PERMITTEE

Silgan Containers Manufacturing Corporation - Hoopeston Plant
Attn: Jeff Miller
324 West Main Street
Hoopeston, Illinois 600942

Application No.: 00120004 I.D. No.: 183045AAA
Applicant's Designation: CROWNRETROFIT Date Received: January 16, 2001
Subject: End Liners
Date Issued:
Location: 324 West Main Street, Hoopeston

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of an upgrade to press line #1 consisting of two new end liners as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Unit: End Liners
Control: None

1.1.1 Description

Sheets of pre-coated metal are fed into the End Press #1. The End Press forms 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".

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
End Liners	Two Crown Rotary End Liners	None

1.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected end liner" for the purpose of these unit-specific conditions, is each end liner as described in Conditions 1.1.1 and 1.1.2.
- b. The affected end liners are subject to 35 IAC Part 215, Subpart F, Coating Operations: The Permittee 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:

	<u>kg/l</u>	<u>lb/gal</u>
End Sealing Compound Coat	0.44	3.7

- c. The affected end liners are subject to 35 IAC 212.321(a), which provides that the Permittee shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, 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, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

1.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected 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 affected end liners are not beverage can coating lines.
- b. The Permittee is not 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 affected end liners are required to meet 35 IAC 215.204 [35 IAC 215.209].

1.1.5 Control Requirements

None

1.1.6 Emission Limitations

There are no specific emission limitations for this unit, however there are source wide emission limitations on Condition 4 that include this unit.

1.1.7 Testing Requirements

The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 215.105 except for glues and adhesive

coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. Any alternate 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 will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

1.1.8 Monitoring Requirements

None

1.1.9 Recordkeeping Requirements

The recordkeeping requirements specified in Condition 4(b) include the affected end liners.

1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected end liners with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected end liners 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, as defined in 35 IAC 201.102:

Usage of different materials for the affected end liner, provided that the Permittee continues to comply with the conditions of this permit.

1.1.12 Compliance Procedures

Compliance with the emission limits established in Condition 4a shall be based on the recordkeeping requirements in Condition 4b and the emission factors and formulas listed below:

$$\text{VOM/HAP Emissions (tons)} = (\text{Material usage, gallons}) \times (\text{VOM/HAP content of the material, lb/gallon}) / (2000 \text{ lb/ton})$$

2. The existing end liners (to be replaced) must be removed prior to operation of the new end liners.
3. Operation of the equipment being constructed and/or modified is allowed under this permit until final action is taken on the Clean Air Act Permit Program (CAAPP) application for this source, provided that such CAAPP application has been received and been deemed complete by the Illinois EPA. As a result, the Permittee must still update the CAAPP application to include the aforementioned equipment but is not required to submit an application for a state operating permit in the interim.
- 4a. i. Emissions and operation of this source (all emission units at the Hoopeston Facility) shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
End Compound	9,706	116,470	26.10	208.8
Mister	250	2,000	0.79	6.3
Solvent Cleanup	125	1,000	0.40	3.2

- ii. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source (all emission units at the Hoopeston facility) shall not exceed the following limits:

<u>Individual HAP Emissions</u>	
<u>(Tons/Month)</u>	<u>(Ton/Year)</u>
1.0	9.9

<u>Combination of HAP Emissions</u>	
<u>(Tons/Month)</u>	<u>(Ton/Year)</u>
2.5	24.9

- iii. Compliance with the annual limit shall be determined from a running total of 12 months of data.

- b. The Permittee shall maintain records of the following items for the source (all emission units at the Hoopeston facility) to demonstrate compliance with Condition 4a.
 - i. Usage of each material (gallons/month and gallons/year);
 - ii. VOM content of each material (lb gallon, less water);
 - iii. HAP content of each material (lb/gallon); and
 - iv. VOM and HAP emissions from the source (tons/month and tons/year).

Note: Condition 4 has been added to limit the source to below the applicability threshold of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the source does not constitute a major source pursuant to these rules.

- 5. This permit supersedes all VOM and HAP emission limitations and recordkeeping requirements from previously issued construction permits at the source.

It should be noted that this permit has been revised to add permit conditions such that the source will not be considered a Major Stationary Source as defined in 40 CFR 52.21(b).

Please note that this permit is issued for the construction (and operation) of the equipment listed above. The Permittee should update their CAAPP application to include this new equipment by submitting form 505-CAAPP - "Supplement to CAAPP Application" along with all other appropriate information to accomplish this.

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

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

DES:JMS:jar

cc: Region 2