

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
Renewal - Federally Enforceable State Operating Permit (FESOP)
Ball Aerosol & Specialty Container, Inc.
Danville, Illinois

Site Identification No.: 183020AFK
Application No.: 06020004

Schedule

Public Comment Period Begins: August 7, 2014
Public Comment Period Closes: September 6, 2014

Illinois EPA Contacts

Permit Analyst: Jocelyn Stakely
Community Relations Coordinator: Brad Frost
217/782-7027
Brad.frost@illinois.gov

I. INTRODUCTION

The Ball Aerosol & Specialty Container, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for their Metal Can Manufacturing facility. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

Ball Aerosol & Specialty Container, Inc. facility located in Danville, Illinois assembles pre-coated and pre-printed metal sheets to form aerosol cans. The facility operates five (5) Side Seam Spray Coating Lines with two (2) 1.28 mmBtu/hr natural gas-fired curing ovens (Lines #4 and #5), a parts cleaning station, eight (8) tab lube (metal punching) processes, a drum room (spray gun cleaning), and seven (7) videojet printers. The sideseam process is performed on five lines at the facility. Each of the five sideseam lines has the capability to coat both the inside and outside of the cans. The ends for cans are stamped from coated and decorated metal sheets in a punch press operation.

The coatings which are emitted to the atmosphere during the side seam process, and end manufacturing as volatile organic material (VOM). These materials also contain components that are considered hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Illinois Pollution Control Board has specific standards for units emitting volatile organic material (VOM). The specific standards for this company are 35 Ill. Adm. Code 215 Subpart F Regulations for Coating Operations. These regulations limit the amount of VOM that may be in the coatings used. The requirements of the NESHAP apply to major sources of hazardous air pollutants. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels therefore the NESHAP regulations do not apply. The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern is volatile organic material (VOM) which is created by the Metal Can Manufacturing. The facility has limited their throughput that will keep the VOM emissions below the major source threshold level of 100 tons per year for VOM.

Other emissions of hazardous air pollutants (HAP) are also emitted; however, their levels are also depended on the amount of VOM and will remain below the major source threshold level of 10 ton per year for single HAP and 25 ton per year for combined total HAPs.

V. CONTENTS OF THE PERMIT

This renewed permit that the Illinois EPA is proposing to issue will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 tons major source threshold.)

The permit sets limitations on Metal Can manufacturing facility emissions. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out

these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.