

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

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

Application No.: 00090004

I.D. No.: 183045AAA

Applicant's Designation: D&A800REPL

Date Received: May 11, 2000

Subject: Replacement 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 two 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 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 end sealing compound or "end compound". The nozzles that apply end compound must be lubricated intermittently. The lubrication operation is referred to as a "mister".

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
End Liners	Two Dewey and Alny Model 800 End Liner with "Mister"	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 of a coating line subject to the limitations of 35 IAC 215.204 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 coating line is required to meet 35 IAC 215.204 [35 IAC 215.209].

1.1.5 Control Requirements

None

1.1.6 Emission Limitations

- a. Emissions from the affected end liners (two end liner combined) shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
4.73	47.28

These limits are based on the maximum material usage and the compliance procedures specified in Condition 1.1.12.

- b. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the two new end lines shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs.

- c. 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 (running 12 month total).
- d. The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD) (See Attachment 1). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

1.1.7 Testing Requirements

- a. 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. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A incorporated by reference in 35 IAC 215.105. 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)].
- b. Transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA [35 IAC 215.208(b)].

1.1.8 Monitoring Requirements

None

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected end liners to demonstrate compliance with condition 1.1.6:

- a. Amount of each material used (tons/month and tons/year);
- b. VOM and HAP content of each material used (lb VOM/gallon and wt. %); and
- c. VOM and HAP emissions (tons/month and tons/year).

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:

Emissions of VOM in excess of the limits specified in condition 1.1.6.

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 1.1.6 shall be based on the recordkeeping requirements in Condition 1.1.9 and the emission factors and formulas listed below:

To determine compliance with Condition 1.1.6, VOM emissions from the affected end liners shall be

calculated based on the following:

VOM Emissions (tons) = (Material Usage, tons) x (VOM
Content of Material, wt. %)

2. This permit is issued based upon the shutdown of existing end liner #17 prior to operation of new end liner #17 and shutdown of existing end liner #7 prior to operation of new end liner #7.
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.

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

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cc: Region 2

Attachment 1

PSD Applicability

Contemporaneous Time Period of November 1995 Through November 2000

Table I - Emissions Increases Associated With The Proposed Modification

<u>Item of Equipment</u>	<u>Proposed Commencement of Operation Date</u>	<u>VOM Emissions Increase (Tons/Year)</u>	<u>Permit Number</u>
End Liners (New End Liners 7 & 17)	2000	47.28	00090004

Table II - Source-Wide Creditable Contemporaneous Emission Increases

<u>Item of Equipment</u>	<u>Commencement of Operation Date</u>	<u>VOM Emissions Increase (Tons/Year)</u>	<u>Permit Number</u>
None			

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

<u>Item of Equipment</u>	<u>Commencement of Operational Change Date</u>	<u>VOM Emissions Decrease (Tons/Year)</u>	<u>Permit Number</u>
End Press Removal (Lines 201, 204, 205, 206, and 208) ^a	1996, 1997	29.44	N/A
Can Line Removal (Press Lines 1, 3, 4, 6, 8, and 9) ^b	1997, 1998	4.51	N/A
End Liner Removal (Press Lines 7 and 17) ^c	2000	13.60	00090004

Table IV - Net Emissions Change

	<u>(Tons/Year)</u>
Increases Associated With The Proposed Modification	47.28
Creditable Contemporaneous Emission Increases	0.00
Creditable Contemporaneous Emission Decreases	- 47.55
	- 0.27

^a This decrease is based on the actual emissions averaged from the two year period preceding the operational change. This includes calendar years 1995, 1996 and 1997. These presses have been decommissioned.

^b This decrease is based on the actual emissions averaged from the two year period preceding the operational change (May 1996 through April 1998). These presses have been decommissioned.

^c This decrease is based on the actual emissions averaged from the two year period preceding the operational change (Calendar Year 1998 through 1999). Each press will be decommissioned prior to operation of the respective replacement press.

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