

- b. Each affected end liner is subject to 35 IAC Part 215, Subpart F, Coating Operations: 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, delivered to the coating applicator:

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

- c. Each affected end liner is subject to 35 IAC 212.321(a), which provides that 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, 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 liner 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 liner is not a beverage can coating line.
- b. No owner or operator of a coating line 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 [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 in Condition 5a 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. 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)].

1.1.8 Monitoring Requirements

None

1.1.9 Recordkeeping Requirements

The source wide recordkeeping requirements specified in Condition 5b 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 liners, 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 5a shall be based on the recordkeeping requirements in Condition 5b and the emission factors and formulas listed below:

$$\text{VOM Emissions (tons)} = (\text{Material Usage, gallons}) \times (\text{VOM Content of Material, lb/gallon}) / (2000 \text{ lb/ton})$$

1.2 Unit: Conversion Press
Control: None

1.2.1 Description

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 press(es) 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.

1.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Conversion Press	Conversion Press(es)	None

1.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected conversion press" for the purpose of these unit-specific conditions, is a conversion press as described in Conditions 1.2.1 and 1.2.2.
- b. The affected conversion press is subject to 35 IAC Part 215, Subpart K, Use of Organic Material: 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 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 [35 IAC 215.301].
- c. The affected conversion press is subject to 35 IAC 212.321(a), which provides that 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, 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)].

1.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected conversion press 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 conversion press is not a beverage can coating line.

1.2.5 Control Requirements

None

1.2.6 Emission Limitations

There are no specific emission limitations for this unit, however there are source wide emission limitations in Condition 5a that include this unit.

1.2.7 Testing Requirements

None

1.2.8 Monitoring Requirements

None

1.2.9 Recordkeeping Requirements

The source wide recordkeeping requirements specified in Condition 5b include the affected conversion press.

1.2.10 Reporting Requirements

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

None

1.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected conversion press 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 conversion press, provided that the Permittee continues to comply with the conditions of this permit.

1.2.12 Compliance Procedures

Compliance with the emission limits established in Condition 5a shall be based on the recordkeeping requirements in Condition 5b and the emission factors and formulas listed below:

$$\text{VOM Emissions (tons)} = (\text{Material Usage, gallons}) \times (\text{VOM Content of Material, lb/gallon}) / (2000 \text{ lb/ton})$$

1.3 Unit: Post Repair Spray Operations
Control: Concentrator and Thermal Oxidizer

1.3.1 Description

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 contamination. Four post repair spray operations are being added. The post repair spray operation is controlled by a new concentrator and an existing thermal oxidizer. The purpose of the new concentrator is to convert a high-volume, low-VOM, air stream into a high-VOM, lower-volume exhaust.

1.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Post Repair Spray Operation	Penalver Post Repair Spray Operations	Concentrator and Thermal Oxidizer

1.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected post repair spray operation" for the purpose of these unit-specific conditions, is the post repair spray operation as described in Conditions 1.3.1 and 1.3.2.
- b. The Permittee shall comply with one of the following compliance methods:
 - i. Each affected post repair spray operation is subject to 35 IAC Part 215, Subpart F, Coating Operations: 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, delivered to the coating applicator [35 IAC 215.204(b)]:

	<u>kg/l</u>	<u>lb/gal</u>
Interior Body Spray Coat	0.51	4.2
Exterior End Coat	0.51	4.2

ii. Owners or operators of coating lines subject to 35 IAC 215.204 may comply with 35 IAC 215.205, rather than with 35 IAC 215.204. The methods or procedures used to determine emissions of organic material under 35 IAC 215.205 shall be approved by the Illinois EPA. Emissions of volatile organic material 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:

- A. 75% reduction in the overall emissions of volatile organic material from the coating line; and
- B. Oxidation to carbon dioxide and water of 90% of the nonmethane volatile organic material (measured as total combustible carbon) which enters the afterburner [35 IAC 215.205(a)].

c. Each affected post repair spray operation is subject to 35 IAC 212.321(a), which provides that 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, 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)].

1.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected post repair spray operation 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 post repair spray operation is not a beverage can coating line.
- b. No owner or operator of a coating line 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 [35 IAC 215.209].

1.3.5 Control Requirements

When demonstrating compliance with Condition 1.3.6 through the use of the thermal oxidizer, the thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, before the coating process is begun, and this temperature shall be maintained during operation of the affected post repair spray operation.

1.3.6 Emission Limitations

There are no specific emission limitations for this unit, however there are source wide emission limitations in Condition 5a that include this unit.

1.3.7 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. 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)].

1.3.8 Monitoring Requirements

The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the thermal oxidizer is in use. This device shall monitor the thermal oxidizer combustion chamber temperature.

1.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5b, the Permittee shall maintain records of the following items for affected post repair spray operation to demonstrate compliance with Condition 5a:

The Permittee shall collect and record the following information each day.

- a. Thermal oxidizer combustion chamber monitoring data.
- b. A log of operating time for the capture system, thermal oxidizer, monitoring device, and the associated emission unit(s).
- c. A maintenance log for the capture system, thermal oxidizer, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.

1.3.10 Reporting Requirements

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

None

1.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected post repair spray operation 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 post repair spray operation, provided that the Permittee continues to comply with the conditions of this permit.

1.3.12 Compliance Procedures

Compliance with the emission limits established in Condition 5a shall be based on the recordkeeping requirements in Condition 5b and the emission factors and formulas listed below:

$$\text{VOM Emissions (tons)} = (\text{Material Usage, gallons}) \times (\text{VOM Content of Material, lb/gallon}) \times (1 - K^*/100) / (2000 \text{ lb/ton})$$

* As specified by manufacturer or vendor of the concentrator/thermal oxidizer or by testing. Note: if the control device is not being used then K = 0%.

2. Notwithstanding Standard Condition 1, this permit authorizes installation of the final conversion press, end liners and post repair spray operations for the "Pop and Pour End Line".
3. This permit is issued based on modification to an existing post repair spray operation (300 DIA project) to include a concentrator, without any increase in emissions of volatile organic material into the atmosphere.
4. 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.
- 5a. i. Emissions and operation of this source (all emission units at the Rochelle 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	5,208	41,667	9.3	75.0
Mister	39	343	0.2	1.1
Tab Lube	531	4,252	1.3	11.1
Post Repair Spray ¹	6,353	50,828	1.1	9.4
Coating ²	***	***	16.2	130.0
Solvent Cleanup	262	2,098	0.9	7.0
Other ³	---	---	0.1	2.0

¹ See Condition 1.3.12 for compliance procedures

² In the absence of material usage limitations, the source has accepted weekly recordkeeping to demonstrate compliance.

³ Storage tanks, video jet printers and paint strip tank

- ii. 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 Rochelle facility) to demonstrate compliance with Condition 5a.
 - i. Usage of each material used on all emission units other than the coaters (gallons/month and gallons/year);

- ii. Usage of each material used for the coaters (gallons/week, gallons/month and gallons/year);
- iii. VOM content of each material (lb/gallon, less water);
- iv. VOM emissions from the coaters (tons/week, tons/month and tons/year).
- vi. VOM emissions from each material used at the source (tons/month and tons/year).

Note: Condition 5 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.

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

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