

PROPOSED

[Issuance Date]

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

05-XXX-E CAB
File No. 0074-01

Mr. Paul Labbe
Plant Manager
Ball Metal Beverage
Container Corporation
91-320 Komohana Street
Kapolei, Hawaii 96707

Dear Mr. Labbe:

Subject: Covered Source Permit (CSP) No. 0074-01-C
Application for Renewal No. 0074-03
Ball Metal Beverage Container Corporation
Two-Piece Aluminum Can Production Plant
Located at: 91-320 Komohana Street, Kapolei, Oahu
Date of Expiration: [Five Year Period from Expiration Date]

The subject Covered Source Permit is issued in accordance with Hawaii Administrative Rules, Title 11, Chapter 60.1. The issuance of this permit is based on your application dated June 27, 2003, and additional information dated January 20, 25, 27 and February 7, 17, 18, 2005. This permit supercedes CSP No. 0074-01-C issued on July 14, 1999, and amended on December 5, 2002. The receipt for the renewal of a major covered source permit application fee for \$3,000.00 is attached.

The Covered Source Permit is issued subject to the conditions/requirements set forth in the following Attachments:

- Attachment I: Standard Conditions
- Attachment II: Special Conditions
- Attachment II-INSIG: Special Conditions - Insignificant Activities
- Attachment III: Annual Fee Requirements
- Attachment IV: Annual Emissions Reporting Requirements

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The forms for submission are as follows:

Annual Emissions/Monitoring Report Forms: Ink/Exterior Base Coat; Clear Base Coat/Overvornish; Inside Spray Coat; and HAPs/Solvents
Compliance Certification Form

This permit: (a) shall not in any manner affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to personal injury or property damage caused by, resulting from or arising out of the design, installation, maintenance, or operation of the equipment; and (c) in no manner implies or suggests that the Hawaii Department of Health, or its officers, agents, or employees, assumes any liability, directly or indirectly, for any loss due to personal injury or property damage caused by, resulting from or arising out of the design, installation, maintenance, or operation of the equipment.

Sincerely,

THOMAS E. ARIZUMI, P.E., CHIEF
Environmental Management Division

CBS:jhm

Enclosures

c: CAB Monitoring Section

PROPOSED

ATTACHMENT I: STANDARD CONDITIONS COVERED SOURCE PERMIT NO. 0074-01-C

[Issuance Date]

[Expiration Date]

This permit is granted in accordance with the Hawaii Administrative Rules (HAR), Title 11, Chapter 60.1, Air Pollution Control, and is subject to the following standard conditions:

1. Unless specifically identified, the terms and conditions contained in this permit are consistent with the applicable requirement, including form, on which each term or condition is based.

(Auth.: HAR §11-60.1-90)

2. This permit, or a copy thereof, shall be maintained at or near the source and shall be made available for inspection upon request. The permit shall not be wilfully defaced, altered, forged, counterfeited, or falsified.

(Auth.: HAR §11-60.1-6; SIP §11-60-11)²

3. This permit is not transferable whether by operation of law or otherwise, from person to person, from place to place, or from one piece of equipment to another without the approval of the Department of Health, except as provided in HAR, Section 11-60.1-91.

(Auth.: HAR §11-60.1-7; SIP §11-60-9)²

4. A request for transfer from person to person shall be made on forms furnished by the Department of Health.

(Auth.: HAR §11-60.1-7)

5. In the event of any changes in control or ownership of the facilities to be constructed or modified, this permit shall be binding on all subsequent owners and operators. The permittee shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, copies of which will be forwarded to the Department of Health and the Regional Administrator for the U.S. Environmental Protection Agency (EPA).

(Auth.: HAR §11-60.1-5, §11-60.1-7, §11-60.1-94)

6. The facility covered by this permit shall be constructed and operated in accordance with the application, and any information submitted as part of the application, for the Covered Source Permit. There shall be no deviation unless additional or revised plans are submitted to and approved by the Department of Health, and the permit is amended to allow such deviation.

(Auth.: HAR §11-60.1-2, §11-60.1-4, §11-60.1-82, §11-60.1-84, §11-60.1-90)

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7. This permit (a) does not release the permittee from compliance with other applicable statutes of the State of Hawaii, or with applicable local laws, regulations, or ordinances, and (b) shall not constitute, nor be construed to be an approval of the design of the covered source.

(Auth.: HAR §11-60.1-5, §11-60.1-82)

8. The permittee shall comply with all the terms and conditions of this permit. Any permit noncompliance constitutes a violation of HAR, Chapter 11-60.1 and the Clean Air Act and is grounds for enforcement action; for permit termination, suspension, reopening, or amendment; or for denial of a permit renewal application.

(Auth.: HAR §11-60.1-3, §11-60.1-10, §11-60.1-19, §11-60.1-90)

9. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid.

(Auth.: HAR §11-60.1-90)

10. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the terms and conditions of this permit.

(Auth.: HAR §11-60.1-90)

11. This permit may be terminated, suspended, reopened, or amended for cause pursuant to HAR, Sections 11-60.1-10 and 11-60.1-98, and Hawaii Revised Statutes (HRS), Chapter 342B-27, after affording the permittee an opportunity for a hearing in accordance with HRS, Chapter 91.

(Auth.: HAR §11-60.1-3, §11-60.1-10, §11-60.1-90, §11-60.1-98)

12. The filing of a request by the permittee for the termination, suspension, reopening, or amendment of this permit, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Auth.: HAR §11-60.1-90)

13. This permit does not convey any property rights of any sort, or any exclusive privilege.

(Auth.: HAR §11-60.1-90)

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14. The permittee shall notify the Department of Health in writing of the following dates:
- a. The **anticipated date of initial start-up** for each emission unit of a new source or significant modification not more than sixty (60) days or less than thirty (30) days prior to such date;
 - b. The **actual date of construction commencement** within fifteen (15) days after such date; and
 - c. The **actual date of start-up** within fifteen (15) days after such date.

(Auth.: HAR §11-60.1-90)

15. The permittee shall furnish, in a timely manner, any information or records requested in writing by the Department of Health to determine whether cause exists for terminating, suspending, reopening, or amending this permit, or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Department of Health copies of records required to be kept by the permittee. For information claimed to be confidential, the Director of Health may require the permittee to furnish such records not only to the Department of Health but also directly to the U.S. EPA Administrator along with a claim of confidentiality.

(Auth.: HAR §11-60.1-14, §11-60.1-90)

16. The permittee shall notify the Department of Health in writing, of the **intent to shut down air pollution control equipment for necessary scheduled maintenance** at least twenty-four (24) hours prior to the planned shutdown. The submittal of this notice shall not be a defense to an enforcement action. The notice shall include the following:
- a. Identification of the specific equipment to be taken out of service, as well as its location and permit number;
 - b. The expected length of time that the air pollution control equipment will be out of service;
 - c. The nature and quantity of emissions of air pollutants likely to be emitted during the shutdown period;
 - d. Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period; and
 - e. The reasons why it would be impossible or impractical to shut down the source operation during the maintenance period.

(Auth.: HAR §11-60.1-15; SIP §11-60-16)²

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17. **Except for emergencies which result in noncompliance with any technology-based emission limitation in accordance with HAR, Section 11-60.1-16.5, in the event any emission unit, air pollution control equipment, or related equipment malfunctions or breaks down in such a manner as to cause the emission of air pollutants in violation of HAR, Chapter 11-60.1 or this permit,** the permittee shall immediately notify the Department of Health of the malfunction or breakdown, unless the protection of personnel or public health or safety demands immediate attention to the malfunction or breakdown and makes such notification infeasible. In the latter case, the notice shall be provided as soon as practicable. Within five (5) working days of this initial notification, the permittee shall also submit, in writing, the following information:
- a. Identification of each affected emission point and each emission limit exceeded;
 - b. Magnitude of each excess emission;
 - c. Time and duration of each excess emission;
 - d. Identity of the process or control equipment causing each excess emission;
 - e. Cause and nature of each excess emission;
 - f. Description of the steps taken to remedy the situation, prevent a recurrence, limit the excessive emissions, and assure that the malfunction or breakdown does not interfere with the attainment and maintenance of the National Ambient Air Quality Standards and state ambient air quality standards;
 - g. Documentation that the equipment or process was at all times maintained and operated in a manner consistent with good practice for minimizing emissions; and
 - h. A statement that the excess emissions are not part of a recurring pattern indicative of inadequate design, operation, or maintenance.

The submittal of these notices shall not be a defense to an enforcement action.

(Auth.: HAR §11-60.1-16; SIP §11-60-16)²

18. A copy of applicable correspondence or records submitted to the Department of Health shall be provided to the U.S. EPA Administrator.

(Auth.: HAR §11-60.1-90)

19. The permittee may request confidential treatment of any records in accordance with HAR Section 11-60.1-14.

(Auth.: HAR §11-60.1-14, §11-60.1-90)

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20. This permit shall become invalid with respect to the authorized construction if construction is not commenced as follows:

- a. Construction shall be commenced within eighteen (18) months after the permit takes effect, shall not be discontinued for a period of eighteen (18) months or more, and shall be completed within a reasonable time.
- b. For phased construction projects, each phase shall commence construction within eighteen (18) months of the projected and approved commencement dates in the permit. This provision shall be applicable only if the projected and approved commencement dates of each construction phase are defined in Attachment II, Special Conditions of this permit.

(Auth.: HAR §11-60.1-9, §11-60.1-90)

21. The Department of Health may extend the time periods specified in Standard Condition No. 20 upon a satisfactory showing that an extension is justified. Requests for an extension shall be submitted in writing to the Department of Health.

(Auth.: HAR §11-60.1-9, §11-60.1-90)

22. The permittee shall submit fees in accordance with HAR, Chapter 11-60.1, Subchapter 6.

(Auth.: HAR §11-60.1-90)

23. All certifications shall be in accordance with HAR, Section 11-60.1-4.

(Auth.: HAR §11-60.1-4, §11-60.1-90)

24. The permittee shall allow the Director of Health, the Regional Administrator for the U.S. EPA and/or an authorized representative, upon presentation of credentials or other documents required by law:

- a. To enter the premises where a source is located or emission-related activity is conducted, or where records must be kept under the conditions of this permit and inspect at reasonable times all facilities, equipment, including monitoring and air pollution control equipment, practices, operations, or records covered under the terms and conditions of this permit and request copies of records or copy records required by this permit; and
- b. To sample or monitor at reasonable times substances or parameters to assure compliance with this permit or applicable requirements of HAR, Chapter 11-60.1.

(Auth.: HAR §11-60.1-11, §11-60.1-90)

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25. Within thirty (30) days of **permanent discontinuance of the construction, modification, relocation, or operation of the facility covered by this permit**, the discontinuance shall be reported in writing to the Department of Health by a responsible official of the source.

(Auth.: HAR §11-60.1-8; SIP §11-60-10)²

26. Each permit renewal application shall be submitted to the Department of Health no less than twelve (12) months and no more than eighteen (18) months prior to the permit expiration date. The Department of Health may allow a permit renewal application to be submitted no less than six (6) months prior to the permit expiration date, if the Department of Health determines that there is reasonable justification.

(Auth.: HAR §11-60.1-101, 40 CFR §70.5 (a)(1)(iii))¹

27. The terms and conditions included in this permit, including any provision designed to limit a source's potential to emit, are federally enforceable unless such terms, conditions, or requirements are specifically designated as not federally enforceable.

(Auth.: HAR §11-60.1-93)

28. The compliance plan and compliance certification submittal requirements shall be in accordance with HAR, Sections 11-60.1-85 and 11-60.1-86. As specified in HAR, Section 11-60.1-86, the compliance certification shall be submitted to the Department of Health and the U.S. EPA Regional Administrator once per year, or more frequently as set by any applicable requirement.

(Auth.: HAR §11-60.1-90)

29. **Any document (including reports) required to be submitted by this permit shall be certified as being true, accurate, and complete by a responsible official in accordance with HAR, Sections 11-60.1-1 and 11-60.1-4, and shall be mailed to the following address:**

Clean Air Branch
Environmental Management Division
State of Hawaii Department of Health
P.O. Box 3378
Honolulu, HI 96801-3378

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Upon request, all correspondence to the State of Hawaii Department of Health associated with this Covered Source Permit shall have duplicate copies forwarded to:

**Chief
Permits Office, (Attention: Air-3)
Air Division
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105**

(Auth.: HAR §11-60.1-4, §11-60.1-90)

30. To determine compliance with submittal deadlines for time-sensitive documents, the postmark date of the document shall be used. If the document was hand-delivered, the date received (“stamped”) at the Clean Air Branch shall be used to determine the submittal date.

(Auth.: HAR §11-60.1-5, §11-60.1-90)

¹ The citations to the Code of Federal Regulations (CFR) identified under a particular condition, indicate that the permit condition complies with the specified provision(s) of the CFR. Due to the integration of the preconstruction and operating permit requirements, permit conditions may incorporate more stringent requirements than those set forth in the CFR.

² The citations to the State Implementation Plan (SIP) identified under a particular condition, indicate that the permit condition complies with the specified provision(s) of the SIP.

**ATTACHMENT II: SPECIAL CONDITIONS
COVERED SOURCE PERMIT NO. 0074-01-C**

[Issuance Date]

[Expiration Date]

In addition to the standard conditions of the Covered Source Permit, the following special conditions shall apply to the permitted facility:

Section A. Equipment Description

1. This permit encompasses the following equipment and associated appurtenances:
 - a. One (1) can washer
Reynolds Metals Co. (model no. RMC 96", max. fuel consumption of 1,850 cf/hr, with three Maxon burners model nos. 415, 161P, and 67)
 - b. Three (3) can printers
Three (3) Rutherford Machine Co. (model no. ACP-400)
 - c. Three (3) can overvarnish units
Three (3) Reynolds Metals Co. (Reynolds designed Gravure Unit R-400)
 - d. Three (3) can printer ovens
Two (2) Ross (max. fuel consumption of 2,000 cf/hr, with two Eclipse Fuel Engineering Co. burners model nos. RAH80 and RAH120); and
One (1) Feco (max. fuel consumption of 2,000 cf/hr, with two Eclipse Fuel Engineering Co. burners model nos. RAH80 and RAH120)
 - e. Eight (8) can inside spray machines
Eight (8) Reynolds Metals Co. (model no. DG-250)
 - f. Two (2) can inside bake ovens
One (1) Feco (model no. Magna Air, serial no. 15357, max. fuel consumption of 2,400 cf/hr with two Eclipse Fuel Engineering Co. burners model no. RAH120); and
One (1) Ross (model no. Inside Bake, serial no. 75530, max. fuel consumption of 2,000 cf/hr with two Eclipse Fuel Engineering Co. burners model nos. RAH80 and RAH120).

(Auth.: HAR §11-60.1-3)

2. An identification tag or name plate shall be displayed on the equipment listed above which identifies the model no., serial no., and/or manufacturer. The identification tag or name plate shall be permanently attached to the equipment at a conspicuous location.

(Auth.: HAR §11-60.1-5)

Section B. Applicable Federal Regulations

1. The beverage can plant is subject to the provisions of the following federal regulations:
 - a. 40 CFR Part 60, Standards of Performance for New Stationary Sources, Subpart A, General Provisions; and

- b. 40 CFR Part 60, Standards of Performance for New Stationary Sources Subpart WW, Standards of Performance for the Beverage Can Surface Coating Industry.

(Auth.: HAR §11-60.1-3, §11-60.1-90, §11-60.1-161; 40 CFR Part 60)¹

2. The permittee shall comply with all applicable provisions of these standards, including all emissions limits, notification, testing, monitoring, and reporting requirements. The major requirements of these standards are detailed in the special conditions of this permit.

(Auth.: HAR §11-60.1-3, §11-60.1-90, §11-60.1-161; 40 CFR Part 60)¹

Section C. Operational Limitations.

1. Each beverage can surface coating consumed in the production of beverage cans shall be limited to the following on a rolling twelve (12) month basis:

- a. The sum of inks and exterior base coat shall not exceed 62,720 lb/yr;
- b. The sum of clear base coat and overvarnish shall not exceed 333,120 lb/yr; and
- c. Inside spray coat shall not exceed 1,136,160 lb/yr.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

2. The use of isopropyl alcohol (IPA)/butanol solvents used for clean-up shall not exceed 66,880 lb/yr.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

3. The ovens and can washer shall be fired only on synthetic natural gas.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

4. The permit conditions prescribed herein may at any time be revised by the Department of Health to reflect federal or state promulgated rules on ethylene glycol.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

5. The permittee may install exterior base coat machines and cure ovens upon complying with the following provisions:

- a. The permittee shall submit to the Department of Health a written request to install exterior base coat machines and cure ovens with applicable manufacturer's data. This request shall be approved by the Department of Health prior to the installation;
- b. The exterior base coat machines and cure ovens shall not increase the estimated beverage can production rate of 2,332,800 cans/day;

- c. The exterior base coat machines and cure ovens shall comply with all applicable conditions including all air pollution control equipment requirements, operating restrictions and emission limits; and
- ___d. Within thirty (30) days of installation, the permittee shall submit to the Department of Health written documentation on the installation dates and on the make, size, model, and serial numbers of the exterior base coat machines and cure ovens.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

Section D. Emission Limitations

- 1. The permittee shall not discharge or cause to discharge VOC emissions to the atmosphere that exceed the following volume-weighted **calendar-month average emissions**:
 - a. 0.29 kg of VOC per liter of coating solids from each two-piece can exterior base coating operation, except clear base coat;
 - b. 0.46 kg of VOC per liter of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and
 - c. 0.89 kg of VOC per liter of coating solids from each two-piece can inside spray coating operation.

(Auth.: HAR §11-60.1-3, §11-60.1-32, §11-60.1-90, §11-60.1-161; 40 CFR Part 60)¹

- 2. Hazardous air pollutant (HAP) emissions from the facility shall be less than 10 tons/year of any individual HAP and 25 tons/year of any total combination of HAPs. It is assumed that all HAPs in the beverage can surface coating and solvents is released into ambient air.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

- 3. Visible Emissions

For any six (6) minute averaging period, the ovens and can washer shall not exhibit visible emissions of twenty (20) percent opacity or greater, except as follows: during start-up, shutdown, or equipment breakdown, the ovens and can washer may exhibit visible emissions greater than twenty (20) but not exceeding sixty (60) percent opacity for a period aggregating not more than six minutes in any sixty (60) minutes.

(Auth.: HAR §11-60.1-3, §11-60.1-32, §11-60.1-90)

Section E. Monitoring and Recordkeeping Requirements

1. Monitoring

- a. The permittee shall calculate and maintain records on the total amount (lbs) of coating solids used on a monthly and rolling 12-month basis.
- b. The permittee shall calculate monthly average emissions of VOC in accordance with the following method:

- 1) Using the VOC content supplied by the manufacturers calculate the mass of VOC used ($M_o + M_d$) during the calendar month by the following equation:

$$M_o + M_d = \sum L_c \times D_c \times W_o + \sum L_d \times D_d$$

M_o = the mass of VOC-solvent in coatings consumed, as received (kilograms)

M_d = the mass of VOC-solvent added to coatings (kilograms)

L_c = the volume of each coating consumed, as received (liters)

D_c = the density of each coating, as received (kilograms per liter)

W_o = the proportion of VOC in each coating, as received (fraction by weight)

L_d = the volume of each VOC-solvent added to coatings (liters)

D_d = density of each VOC-solvent added to coatings (kilograms per liter)

\sum = the sum of the certain coating type (i.e. exterior base coat, clear coat/overvarnish, or inside spray coat) used and VOC solvent added to the coatings during the calendar month.

- 2) Calculate the total volume of can coating solids used (L_s) in the calendar month:

$$L_s = \sum L_c \times V_s$$

L_s = the volume of coating solids consumed (liters)

V_s = the proportion of solids in each coating, as received (fraction by volume)

- 3) Calculate the volume-weighted average mass of VOC per volume of solids used (G) during the calendar month by the following equation:

$$G = (M_o + M_d) / L_s$$

G = the volume-weighted average of VOC in coatings consumed in a calendar month per volume of coating solids applied (kilograms of VOC per liter). This method assumes that all of the VOC in the coating solids applied will be emitted into the atmosphere.

- c. The permittee shall calculate emissions of HAPs (including MEK), on a semi-annual and annual basis, using the total amount (gallons) of coating, coating density (lb/gallon), and the content of HAP in percent by weight.

(Auth.: HAR §11-60.1-3, §11-60.1-90, §11-60.1-161; 40 CFR §60.493, 40 CFR §60.496)¹

2. Records

- a. Records, data sheets, and invoices of all beverage can coating materials and solvents (including VOC and HAP contents) and calendar month average emissions of VOC shall be kept. Copies of the attached monitoring report forms shall satisfy the record requirements for calendar month average emissions of VOC; and semi-annual and annual basis emissions of HAPs.
- b. The permittee shall maintain records on major inspections, maintenance, and any repair work conducted on the equipment listed in Special Condition No. A.1. At a minimum, these records shall include: the date of the inspection; name and title of the inspector; a short description of the action and/or any such repair work; and a description of the part(s) inspected or repaired. Minor repair work such as daily maintenance is not included.
- c. All records, including support information, shall be maintained for **at least five (5) years** following the date of the monitoring sample, measurement, test, report, or application. Support information includes all maintenance, inspection, and repair records, and copies of all reports required by this permit. These records shall be in a permanent form suitable for inspection and made available to the Department of Health or their representative upon request.

(Auth.: HAR §11-60.1-3, §11-60.1-11, §11-60.1-90)_____

Section F. Notification and Reporting Requirements

- 1. Notification and reporting pertaining to the following events shall be done in accordance with Attachment I, Standard Condition Nos. 17 and 25, respectively:
 - a. *Emissions of air pollutants in violation of HAR, Chapter 11-60.1 or this permit (excluding technology-based emission exceedances due to emergencies); and*
 - b. *Permanent discontinuance of construction, modification, relocation, or operation of the facility covered by this permit.*

(Auth.: HAR §11-60.1-8, §11-60.1-15, §11-60.1-16, §11-60.1-90; SIP §11-60-10, §11-60-16)²

2. The permittee shall report (in writing) **within five (5) working days** any deviations from permit requirements, including those attributable to upset conditions, the probable cause of such deviations and any corrective actions or preventive measures taken. Corrective actions may include a requirement for stack testing, or more frequent monitoring, or could trigger implementation of a corrective action plan.

(Auth.: HAR §11-60.1-3, §11-60.1-15, §11-60.1-16, §11-60.1-90)

3. Compliance Certification

- a. During the permit term, the permittee shall submit at least **annually** to the Department of Health and U.S. EPA Region 9, *Compliance Certification Form* pursuant to HAR, Subsection 11-60.1-86. The permittee shall indicate whether or not compliance is being met with each term or condition of this permit. The compliance certification shall include, at a minimum, the following information:

- 1) The identification of each term or condition of the permit that is the basis of the certification;
- 2) The compliance status;
- 3) Whether compliance was continuous or intermittent;
- 4) The methods used for determining the compliance status of the source currently and over the reporting period;
- 5) Any additional information indicating the source's compliance status with any applicable enhanced monitoring and compliance certification including the requirements of Section 114(a)(3) of the Clean Air Act or any applicable monitoring and analysis provisions of Section 504(b) of the Clean Air Act; and
- 6) Any additional information as required by the Department of Health including information to determine compliance.

- b. *The compliance certification shall be submitted **within ninety (90) days after the end of each calendar year**, and shall be signed and dated by a responsible official.*

- c. *Upon written request of the permittee, the deadline for submitting the compliance certification may be extended, if the Department of Health determines that reasonable justification exists for the extension.*

(Auth.: HAR §11-60.1-4, §11-60.1-86, §11-60.1-90)

4. Monitoring

The permittee shall submit semi-annual reports of the following:

- a. Total pounds of coating solids used on a monthly and rolling 12-month basis;
- b. Total pounds of VOC used on a monthly and annual basis;

- c. The volume-weighted monthly average of VOC emissions, based on the total mass of VOCs discharged per volume of coating solids used (kg of VOC/liter of coating);
- d. Total pounds of HAPs on a semi-annual and annual basis;
- e. Total pounds of IPA/butanol solvents used for clean-up on a semi-annual and annual basis; and
- f. All manufacturer's data sheets showing the coatings and solvents used.

These reports shall be **postmarked by the 30th day following the end of each semi-annual period**. The enclosed *Annual Emissions/Monitoring Report Forms: Ink/Exterior Base Coat, Clear Base Coat/Overvarnish, Inside Spray Coat; and HAPs/Solvents*, shall be used.

(Auth.: HAR §11-60.1-3, §11-60.1-90, 40 CFR §60.495)

5. Annual Emissions

- a. As required by *Attachment IV: Annual Emissions Reporting Requirements* and in conjunction with the requirements of *Attachment III: Annual Fee Requirements*, the permittee shall report **annually** the total tons/yr emitted of each regulated air pollutant, including hazardous air pollutants. The reporting of annual emissions is due **within sixty (60) days following the end of each calendar year**. The completion and submittal of the *Annual Emissions/Monitoring Report Forms: Ink/Exterior Base Coat, Clear Base Coat/Overvarnish, Inside Spray Coat; and HAPs/Solvents*, shall satisfy the annual emissions reporting requirements.
- b. Upon the written request of the permittee, the deadline for reporting of annual emissions may be extended, if the Department of Health determines that reasonable justification exists for the extension.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

Section G. Testing Requirements

1. The Department of Health at any time may require the permittee to conduct or cause to be conducted performance tests on the use of exterior base coat, clear base coat/overvarnish, and inside spray coat to determine the emissions of volatile organic compounds (VOC).

(Auth.: HAR §11-60.1-3, §11-60.1-11, §11-60.1-90, §11-60.1-161, 40 CFR §60.493)¹

2. Performance tests for the emissions of VOC shall be conducted and results reported in accordance with the test methods set forth in 40 CFR Part 60 Appendix A, and 40 CFR Part 60.8 (except for Sections 60.8(d) and (f)). The following test method or U.S. EPA approved equivalent methods with prior written approval from the Department of Health, shall be used:

40 CFR Part 60 Method 24 shall be used for the performance tests for the emissions of VOC.

(Auth.: HAR §11-60.1-3, §11-60.1-11, §11-60.1-90, §11-60.1-161, 40 CFR §60.493, 40 CFR §60.496)¹

3. The permittee shall provide sampling and testing facilities at its own expense. The tests shall be conducted at the maximum expected operating capacity of the facility. The Department of Health may also monitor the tests.

(Auth.: HAR §11-60.1-11, §11-60.1-90, SIP §11-60-15)²

4. **Within thirty (30) days after each calendar month**, the permittee shall complete each source test and maintain records of the summarized test results, all pertinent support calculations, and field/laboratory data.

(Auth.: HAR §11-60.1-3, §11-60.1-11, §11-60.1-90, §11-60.1-161, SIP §11-60-15)^{1,2}

5. Any deviations from these conditions, test methods, or procedures may be cause for rejection of the test results unless such deviations are approved by the Department of Health before the tests.

(Auth.: HAR §11-60.1-3, §11-60.1-11, §11-60.1-90)

Section H. Agency Notification

Any document (including reports) required to be submitted by this Covered Source Permit shall be done in accordance with Attachment I, Standard Condition No. 29.

(Auth.: HAR §11-60.1-4, §11-60.1-90)

¹ The citation to the Code of Federal Regulations (CFR) identified under a particular condition, indicates that the permit condition complies with the specified provision(s) of the CFR. Due to the integration of the preconstruction and operating permit requirements, permit conditions may incorporate more stringent requirements than those set forth in the CFR.

² The citation to the State Implementation Plan (SIP) identified under a particular condition, indicates that the permit condition complies with the specified provision(s) of the SIP.

**ATTACHMENT II-INSIG: SPECIAL CONDITIONS
COVERED SOURCE PERMIT NO. 0074-01-C
INSIGNIFICANT ACTIVITIES**

[Issuance Date]

[Expiration Date]

In addition to the Standard Conditions of the Covered Source Permit, the following Special Conditions shall apply to the permitted facility:

Section A. Equipment Description

This attachment encompasses insignificant activities listed in HAR, §11-60.1-82(f) and (g) for which provisions of this permit and HAR, Subchapter 2, General Prohibitions apply.

(Auth.: HAR §11-60.1-3)

Section B. Operational Limitations

1. The permittee shall take measures to operate applicable insignificant activities in accordance with the provisions of HAR, Subchapter 2 for visible emissions, fugitive dust, incineration, process industries, sulfur oxides from fuel combustion, storage of volatile organic compounds, volatile organic compound water separation, pump and compressor requirements, and waste gas disposal.

(Auth.: HAR §11-60.1-3, §11-60.1-82, §11-60.1-90)

2. The Department of Health may at any time require the permittee to further abate emissions if an inspection indicates poor or insufficient controls.

(Auth.: HAR §11-60.1-3, §11-60.1-5, §11-60.1-82, §11-60.1-90)

Section C. Monitoring and Recordkeeping Requirements

1. The Department of Health reserves the right to require monitoring, recordkeeping, or testing of any insignificant activity to determine compliance with the applicable requirements.

(Auth.: HAR §11-60.1-3, §11-60.1-90)

2. All records shall be maintained for at least five (5) years from the date of any required monitoring, recordkeeping, testing, or reporting. These records shall be in a permanent form suitable for inspection and made available to the Department of Health or their authorized representative upon request.

(Auth.: HAR §11-60.1-3, §11-60.1-11, §11-60.1-90)

Section D. Notification and Reporting

Compliance Certification

1. During the permit term, the permittee shall submit at least **annually** to the Department of Health and U.S. EPA Region 9, the attached *Compliance Certification Form* pursuant to HAR, Subsection 11-60.1-86. The permittee shall indicate whether or not compliance is being met with each term or condition of this permit. The compliance certification shall include at a minimum the following information:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The methods used for determining the compliance status of the source currently and over the reporting period;
 - e. Any additional information indicating the source's compliance status with any applicable enhanced monitoring and compliance certification including the requirements of Section 114(a)(3) of the Clean Air Act or any applicable monitoring and analysis provisions of Section 504(b) of the Clean Air Act; and
 - f. Any additional information as required by the Department of Health including information to determine compliance.

In lieu of addressing each emission unit as specified in the Compliance Certification Form, the permittee may address insignificant activities as a single unit provided compliance is met with all applicable requirements. If compliance is not totally attained, the permittee shall identify the specific insignificant activity and provide the details associated with the noncompliance.

2. *The compliance certification shall be submitted **within ninety (90) days after** the end of each calendar year, and shall be signed and dated by a responsible official.*
3. *Upon written request of the permittee, the deadline for submitting the compliance certification may be extended, if the Department of Health determines that reasonable justification exists for the extension.*

(Auth.: HAR §11-60.1-4, §11-60.1-86, §11-60.1-90)

Section E. Agency Notification

Any document (including reports) required to be submitted by this Covered Source Permit shall be done in accordance with Attachment I, Standard Condition No. 29.

(Auth.: HAR §11-60.1-4, §11-60.1-90)

**ATTACHMENT III: ANNUAL FEE REQUIREMENTS
COVERED SOURCE PERMIT NO. 0074-01-C**

[Issuance Date]

[Expiration Date]

The following requirements for the submittal of annual fees are established pursuant to Hawaii Administrative Rules (HAR), Title 11, Chapter 60.1, Air Pollution Control. Should HAR, Chapter 60.1 be revised such that the following requirements are in conflict with the provisions of HAR, Chapter 60.1, the permittee shall comply with the provisions of HAR, Chapter 60.1:

1. Annual fees shall be paid in full:
 - a. **Within sixty (60) days** after the end of each calendar year; and
 - b. **Within thirty (30) days** after the permanent discontinuance of the covered source.
2. The annual fees shall be determined and submitted in accordance with Hawaii Administrative Rules, Chapter 11-60.1, Subchapter 6.
3. The annual emissions data for which the annual fees are based shall accompany the submittal of any annual fees and submitted on forms furnished by the Department of Health.
4. The annual fees and the emission data shall be mailed to:

**Clean Air Branch
Environmental Management Division
Hawaii Department of Health
P.O. Box 3378
Honolulu, HI 96801-3378**

**ATTACHMENT IV: ANNUAL EMISSIONS REPORTING REQUIREMENTS
COVERED SOURCE PERMIT NO. 0074-01-C**

[Issuance Date]

[Expiration Date]

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the nature and amounts of emissions.

1. The annual emissions reporting requirements shall be satisfied with the completion of the attached Annual Emissions/Monitoring Report Forms for: **Ink/Exterior Base Coat; Clear Base Coat/Overvarnish; Inside Spray Coat; and HAPs/Solvents.**
2. The annual reporting period shall be from January 1 to December 31 of each year. Annual reports shall be submitted to the Department of Health **within sixty (60) days** after the end of each calendar year. All reports shall be mailed to the following address:

**Clean Air Branch
Environmental Management Division
Hawaii Department of Health
P.O. Box 3378
Honolulu, HI 96801-3378**

3. The permittee shall retain the information submitted, including all emission calculations. These records shall be in a permanent form suitable for inspection, retained for a minimum of five (5) years, and made available to the Department of Health upon request.
4. Any information submitted to the Department of Health without a request for confidentiality shall be considered public record.
5. In accordance with HAR, Section 11-60.1-14, the permittee may request confidential treatment of specific information by submitting a written request to the Department of Health and clearly identifying the specific information that is to be accorded confidential treatment.

PROPOSED

**ANNUAL EMISSIONS/MONITORING REPORT FORM
INK/EXTERIOR BASE COAT
COVERED SOURCE PERMIT NO. 0074-01-C**

[Issuance Date]

[Expiration Date]

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the following information semi-annually:

(Make Copies for Future Use and Use One Form for Each Coating)

For Period¹: _____ Date: _____

Facility Name: _____

Equipment Location: _____

I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by Department of Health as public record.

Responsible Official (PRINT): _____

TITLE: _____

Responsible Official (Signature): _____

Coating Manufacturer/Code: _____

Month	$M_o + M_d$ (kg of VOC) ²	L_s (liter) ³	G (kg of VOC / liter) ⁴	VOC Emissions (lbs) ⁵	Coating Solids (lbs) ⁶
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					
Total					

- The reporting period shall be semi-annually (Jan-Jun and Jan-Dec).
- $M_o + M_d$ = total mass of VOC used during the calendar month.
- L_s = total volume of coating solids used during the calendar month.
- G = volume-weighted average mass of VOC per volume of coating solids used during the calendar month ($M_o + M_d / L_s$).
- VOC emissions = $2.2 * (M_o + M_d)$.
- Coating Solids = $L_s * (1 \text{ gal} / 3.78 \text{ liters}) * (7.36 \text{ lb} / \text{gal})$.

PROPOSED

**ANNUAL EMISSIONS/MONITORING REPORT FORM
CLEAR BASE COAT/OVERVARNISH
COVERED SOURCE PERMIT NO. 0074-01-C**

[Issuance Date]

[Expiration Date]

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the following information semi-annually:

(Make Copies for Future Use and Use One Form for Each Coating)

For Period¹: _____ Date: _____

Facility Name: _____

Equipment Location: _____

I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by Department of Health as public record.

Responsible Official (PRINT): _____

TITLE: _____

Responsible Official (Signature): _____

Coating Manufacturer/Code: _____

MONTH	$M_o + M_d$ (kg of VOC) ²	L_s (liter) ³	G (kg of VOC / liter) ⁴	VOC Emissions (lbs) ⁵	Coating Solids (lbs) ⁶
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					
Total					

1. The reporting period shall be semi-annually (Jan-Jun and Jan-Dec).
2. $M_o + M_d$ = total mass of VOC used during the calendar month.
3. L_s = total volume of coating solids used during the calendar month.
4. G = volume-weighted average mass of VOC per volume of coating solids used during the calendar month ($M_o + M_d / L_s$).
5. VOC emissions = $2.2 * (M_o + M_d)$.
6. Coating Solids = $L_s * (1 \text{ gal} / 3.78 \text{ liters}) * (7.36 \text{ lb} / \text{gal})$.

PROPOSED

**ANNUAL EMISSIONS/MONITORING REPORT FORM
INSIDE SPRAY COAT
COVERED SOURCE PERMIT NO. 0074-01-C**

[Issuance Date]

[Expiration Date]

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the following information semi-annually:

(Make Copies for Future Use and Use One Form for Each Coating)

For Period¹: _____ Date: _____

Facility Name: _____

Equipment Location: _____

I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by Department of Health as public record.

Responsible Official (PRINT): _____

TITLE: _____

Responsible Official (Signature): _____

Coating Manufacturer/Code: _____

Month	$M_o + M_d$ (kg of VOC) ²	L_s (liter) ³	G (kg of VOC / liter) ⁴	VOC Emissions (lbs) ⁵	Coating Solids (lbs) ⁶
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					
Total					

- The reporting period shall be semi-annually (Jan-Jun and Jan-Dec).
- $M_o + M_d$ = total mass of VOC used during the calendar month.
- L_s = total volume of coating solids used during the calendar month.
- G = volume-weighted average mass of VOC per volume of coating solids used during the calendar month ($M_o + M_d / L_s$).
- VOC emissions = $2.2 * (M_o + M_d)$.
- Coating Solids = $L_s * (1 \text{ gal} / 3.78 \text{ liters}) * (7.36 \text{ lb} / \text{gal})$.

COMPLIANCE CERTIFICATION
COVERED SOURCE PERMIT NO. 0074-01-C
(PAGE 1 OF 2)

[Issuance Date]

[Expiration Date]

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the following certification at least annually, or more frequently as set by an applicable requirement:

(Make Copies for Future Use)

For Period¹: _____ Date: _____

Facility Name: _____

Responsible Official (PRINT): _____

TITLE: _____

Responsible Official (Signature): _____

I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by Department of Health as public record. I further state that I will assume responsibility for the construction, modification, or operation of the source in accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, and any permit issued thereof.

Complete the following information for **each** term or condition of the permit that applies to **each** emissions unit at the source. Also include any additional information as required by the director. The compliance certification may reference information contained in a previous compliance certification submittal to the director, provided such referenced information is certified as being current and still applicable.

1. Current permit number: _____

2. Emissions Unit No./Description: _____

3. Identify the permit term(s) or condition(s) that is/are the basis of this certification:

4. Compliance status during the reporting period:

a. Has the emissions unit been in compliance with the identified permit term(s) or condition(s)?

YES NO

b. If YES, was compliance continuous or intermittent?

Continuous Intermittent

**COMPLIANCE CERTIFICATION
COVERED SOURCE PERMIT NO. 0074-03-C
(CONTINUED, PAGE 2 OF 2)**

[Issuance Date]

[Expiration Date]

c. If NO, explain.

5. The methods used for determining the compliance status of the emissions unit currently and over the reporting period (e.g., monitoring, recordkeeping, reporting, test methods, etc.):

Provide a detailed description of the methods used to determine compliance: (e.g., monitoring device type and location, test method description, or parameter being recorded, frequency of recordkeeping, etc.)

6. Statement of Compliance with Enhanced Monitoring and Compliance Certification Requirements.

a. Is the emissions unit identified in this application in compliance with applicable enhanced monitoring and compliance certification requirements?

YES NO

b. If YES, identify those requirements:

c. If NO, describe below which requirements are not being met:
