**STATEMENT OF BASIS**

Title V Air Operation Permit Renewal
Permit No. 0570160-015-AV

## APPLICANT

The applicant for this project is Ball Metal Beverage Container Corporation. The applicant's responsible official and mailing address are: Mike Weir, Plant Manager, Ball Metal Beverage Container Corp., 4700 Whiteway Drive, Tampa, Hillsborough County, Fl 33617.

## FACILITY DESCRIPTION

Ball Metal Beverage Container Corporation is a beverage container can manufacturing facility which consists of three can lines – Can Lines Nos. 1, 2, and 3. The regulated emissions units include Internal Coating Line Nos. 1 and 2 (EU No. 001), Internal Coating Line No. 3 (EU No. 006), External Coating Line Nos. 1 and 2 (EU Nos. 002), External Coating Line No. 3 (EU No. 007), and Base Coating Line No. 2 (EU No. 004). Also included are the emissions from Facility-wide Cleanup Solvents (EU 008). The combined potential VOC emissions for these emissions units are 268 tons per year. Associated with these emission units are natural gas fired dryers and ovens (described below). The facility is allowed to use propane as a back-up fuel. The sludge dryer, dryers, ovens and storage tanks are not subject to any unit-specific applicable requirements and are considered insignificant emissions units.

The manufacturing process begins with coiled aluminum that is loaded with propane-powered forklifts onto uncoilers. Each uncoiler feeds the aluminum into a dedicated lubricator which applies a thin film of lubricant. Next, dedicated cuppers cut out circular blanks of aluminum and form them into cups. In each line, the cups are conveyed to bodymakers which consist of a series of tooling dies that stretch and form the cups into cans and trimmers that cut the cans to a uniform height. Can Line Nos. 1 and 2 each have eight (8) bodymakers. Can Line No. 3 has ten (10) bodymakers. The trimmed cans are conveyed through a washer and associated natural gas fired dryers for drying. The washers consist of alternating spraying of caustic (NaOH) or acid wash set-up (sulfuric, hydrochloric and/or hydrofluoric acids) and water. After cleaning and drying, the cans are ready for the application of the coatings. The washers' dryers are vented to the atmosphere. The clean, dry cans are conveyed to the decorators for the application of basecoats, external coatings, internal coatings, and overvarnish. Basecoat is applied on Can Line No. 2 only. All three lines have printer stations called decorators. Can Lines Nos. 1 and 2 have one decorator each. Can Line No. 3 has two decorators. Up to eight different patterns of various colors may be applied prior to curing. From the decorators, the cans pass through the bottom coaters and overvarnish is applied before passing into the decorator ovens. Each can line has its own decorator drying oven. The ovens are natural gas fired and vented to the thermal oxidizer. The three lines have also been approved for the use of Ultra Violet technology for bottom coating if desired. The can bottoms are passed across a roller prior to entering the printer. After the can bottoms are coated, they pass through a small box containing UV lamps. The radiant energy from the lamps cure the bottom coating and then the cans continue through the decorator and overvarnish parts of the process.

Next on each line, a thin coating of lacquer is applied to the inside of each can, referred to as internal coating. Particulate matter emissions from the internal coating on the can lines are controlled by baghouses which are vented to the thermal oxidizer. After the internal coating is applied, the lacquer is cured in the internal bake ovens. The cans are then machined further to narrow the can opening, remove any ridges, and roll back the top edges to form a lip to which the can end is attached. Finally, each can

is tested for holes or damage and is palletized for storage and shipment. The can ends (tops of cans) are not manufactured or coated at this facility but are attached by the customer after the cans are filled with product.

The facility is equipped with a regenerative thermal oxidizer (RTO) and is required to achieve 95% destruction efficiency of VOC and HAPs. In order to remain below the PSD threshold, Can Line Nos. 1 and 2 are required to meet 95% destruction efficiency and 60% capture. The permittee has the option of demonstrating another capture/destruction combination which meets the same overall control efficiency of 57%. Can Line No. 3 is required to meet 80% capture efficiency in addition to the 95% destruction efficiency. The permittee has the option of demonstrating another capture/destruction combination which meets the same overall control efficiency of 76%. In addition, emissions are controlled by limiting the VOC content of the coatings to limits which are below New Source Performance Standards (NSPS) maximum concentrations.

To allow for increased flexibility, four alternative modes of operation have been approved that allow for variations in product usages while maintaining emissions below the facility-wide limit. This is accomplished through emissions savings generated from reduced product usage or increased capture efficiencies. This also allows for some uncontrolled operation of Can Line Nos. 1, 2, and 3 during oxidizer repair and maintenance periods.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

## PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility as well as incorporate Permit No. 0570160-014-AC. Permit No. 0570160-014-AC authorized construction of a tenth bodymaker on Can Line No. 3.

## PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued June 15, 2000
Title V Renewal Permit issued August 23, 2006
Application for a Title V Air Operation Permit Renewal received February 11, 2011
Notice of Intent to Issue Air Permit issued May 11, 2011
Public Notice Published May 14, 2011

## PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to EU Nos. 001, 002, 006, and 007. These emission units are subject to CAM for the regulated emissions of volatile organic compounds which are controlled by the RTO.

**PROJECT REVIEW**

This project renews the TV permit as well as incorporates Permit No. 0570160-014-AC. Permit No. 0570160-014-AC authorized construction of a tenth bodymaker on Can Line No. 3.

**CONCLUSION**

This project renews the Title V air operation permit No. 0570160-012-AV, which was issued on August 23, 2006. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.