Florida Department of Environmental Protection

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PERMITTEE

Metal Container Corporation
1100 N. Ellis Road
Jacksonville, Florida 32254

Authorized Representative:
Mr. Bryan Sullivan, Plant Manager

Air Permit No. 0310097-010-AC
Expires: November 9, 2017
PSD-FL-433
Jacksonville Can Plant
Facility ID No. 0310097
Coating Line No. 6

PROJECT

This is the final air construction permit, which authorizes the construction of a new aluminum bottle coating line, Coating Line No. 6, which will produce and coat aluminum bottles at a design capacity of 2,250 bottles per minute and 1.18 billion bottles per year. VOC emissions will be controlled by a new Regenerative Thermal Oxidizer (RTO). The proposed work will be conducted at the existing Jacksonville Can Plant, which is a metal beverage container surface coating facility categorized under Standard Industrial Classification No. 3411. The existing facility is located in Duval County at 1100 N. Ellis Road in Jacksonville, Florida. The UTM coordinates are Zone 17, 428.4 kilometers (km) East, and 3356.6 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

David Lyle Read, P.E.
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For:
Jeffery F. Koerner, Deputy Director
Division of Air Resource Management

JFK/dlr/sh

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Bryan Sullivan, Metal Container Corporation: bryan.sullivan@anheuser-busch.com
Mr. Kirk Krause, Environmental Compliance and Engineering, Inc: kkrause@e-c-e.org
Mr. Vincent Seibold, P.E., Metal Container Corporation: vincent.seibold@anheuser-busch.com
Mr. Richard Rachal, Northeast District: richard.rachal@dep.state.fl.us
Mr. Steve Pace, Jacksonville Environmental Protection Board: pace@coj.net
Ms. Lorinda Shepherd, EPA Region 4: shephard.lorinda@epa.gov
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Scearce

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FACILITY DESCRIPTION

Metal Container Corporation operates the Jacksonville Can Plant, which is located in Duval County at 1100 N. Ellis Road in Jacksonville, Florida. The Jacksonville Can Plant is a two-piece aluminum beverage container manufacturing and surface coating facility that consists of four two-piece aluminum can coating lines with a combined capacity of 8,600 cans per minute, three boilers, a lime silo for wastewater treatment, and an emergency fire pump diesel engine.

Production Line Nos. 2 and 3 include basecoaters, basecoater ovens, printer/decorators, decorator ovens, inside spray machines, and inside bake ovens. Production Line Nos. 4 and 5 include printer/decorators, decorator ovens, inside spray machines, and inside bake ovens. Emissions of volatile organic compounds (VOC) from the existing Production Line Nos. 2 through 5 are controlled by a regenerative thermal oxidizer (RTO).

The manufacturing process begins with coiled aluminum sheet metal that is uncoiled and fed into a lubricator which applies a thin film of lubricant. Machines called cuppers cut out circular blanks from the uncoiled aluminum sheet metal and form the blanks into cups. 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. The trimmed cans are then conveyed through washers for cleaning. The washers consist of alternating spraying of acid wash (sulfuric or hydrofluoric acid) and water. After being washed, the cans are dried in natural-gas fired washer ovens that vent directly to the atmosphere. The clean, dry cans are conveyed to the coating process for the application of basecoat, inks, overvarnish, and inside spray coating.

Basecoat, which is applied to the exterior of the cans, is applied on Can Line Nos. 2 and 3 only. The basecoat is cured in natural gas-fired basecoater ovens before the cans pass to printer stations called decorators. The basecoater ovens are vented to the RTO. All four can lines have decorators. One decorator is used for each of Can Lines Nos. 2, 3 and 4, while Can Line No. 5 has two decorators. In the decorators, different color inks are applied in various patterns and an overvarnish is applied to protect the outer design before passing into the printer pin ovens. The printer pin ovens are natural gas-fired and vented to the RTO. After passing through the pin ovens, an inside spray coating is applied to the interior of the cans. Once the inside spray coating is applied, the coating is cured in the inside bake ovens. The inside bake ovens are also vented to the thermal oxidizer.

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, the cans are tested and 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 cans can also be ink dot or video jet coded for quality control purposes. Emissions from the coding process are minimal and are vented to the atmosphere as fugitive emissions.

The existing facility is equipped with an RTO and is required to achieve 95% destruction efficiency of VOC and hazardous air pollutants (HAP). Can Line Nos. 2 through 5 are required to meet a minimum 95% destruction efficiency and 80% capture efficiency. In addition, emissions are controlled by limiting the VOC content of the coatings to limits to below the applicable New Source Performance Standards (NSPS) maximum concentrations.

The existing facility consists of the following emissions units.

Facility ID No. 0310097

EU No.	Emission Unit Description
008	Lime Storage Silo
012	Three (3) Boilers
013	Can Coating Line Nos. 2, 3, 4, and 5 controlled by a Regenerative Thermal Oxidizer (RTO)
014	Fire Pump Emergency Diesel Engine

PROPOSED PROJECT

The facility is proposing to construct a new 16-ounce aluminum bottle coating line, designated as Aluminum Bottle Coating Line No. 6. The new line will be rated at 2,250 bottles per minute and will have three (3) cuppers,

up to fifteen (15) body makers, two (2) wet can elevators, two (2) washers, three (3) basecoaters, three (3) printer/decorators, and up to eight (8) inside spray machines. After being coated, the bottles will be necked in up to fifteen (15) neckers, flanged, rinsed in up to three (3) rinsers and dried, tested, and finally palletized. Videojet coders will be used in the necker process for quality control and trouble shooting. The coders will be set up on any of the fifteen (15) neckers to analyze bottle defects specific to a necking station. The necking operation will use a new and innovative technology that involves less handling of the bottles, and therefore will result in less scratches, cracks, etc.

VOC emissions from the basecoaters, printer/decorators, and inside spray machines will be controlled with a new, natural gas-fired RTO. The new RTO will operate in addition to the existing RTO which controls Coating Line Nos. 2 through 5. The facility will be required to demonstrate a minimum RTO destruction efficiency of 95% for the new coating line. In addition, an initial capture efficiency test will be required to demonstrate compliance with the minimum 73% overall capture efficiency requirement.

The facility is also proposing to construct miscellaneous supporting emissions sources for Line No. 6, such as natural gas-fired ovens for the washers and rinsers, natural-gas fired water heaters, UV bottom coaters, and coders. These emissions sources will vent directly to the atmosphere or through the building exhaust as fugitive emissions. Particulate matter (PM) emissions from the metalworking processes (bodymakers and wet can elevators) will be controlled by oil mist eliminators. PM emissions incidental to the surface coating operations will be controlled by cartridge filters or baghouses. Cleanup solvent emissions will be vented to the atmosphere as fugitive emissions through the building exhaust.

This project will add the following emissions unit.

Facility ID No. 0310097	
EU No.	**Emission Unit Description**
015	Aluminum Bottle Coating Line No. 6 controlled by an RTO

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The mailing address for the Office of Permitting and Compliance is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements); Appendix E (Final BACT Determination); Appendix F (NSPS – General Provisions); and Appendix G (NSPS – Subpart WW).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Source Obligation:

   a. Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.

   b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

c. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

9. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

10. Objectionable Odors Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rules 62-4.070, F.A.C. (Reasonable Assurance) and 62-296.320(2), F.A.C.]

{Permitting Note: An objectionable odor is defined in Rule 62-210.200(Definitions), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.}

11. General Visible Emissions (VE) Standard:

a. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as 20 percent opacity).

b. Notwithstanding subparagraph 62-296.320(4)(b)1., F.A.C., above, the owner or operator of an emissions unit subject to the general VE standard may request the Department to establish a higher VE standard for that emissions unit. The owner or operator may request that a VE standard be established at that level at which the emissions unit will be able, as indicated by compliance tests, to meet the opacity standard at all times during which the emissions unit is meeting the applicable particulate matter standard. The Department shall establish such a standard, through the permitting process, if it finds that:

(1) The emissions unit was in compliance with the applicable particulate emission standard while a compliance test was being conducted but failed to comply with the general VE standard during the test;

(2) The emissions unit and associated air pollution control equipment were operated and maintained in a manner to minimize the opacity emissions during the compliance test; and

(3) The emissions unit and associated air pollution control equipment were incapable of being adjusted or operated in such a manner as to meet the opacity standard.

(4) If the presence of uncombined water is the only reason for failure to meet VE standards given in this rule, such failure shall not be a violation of this rule.

[Rule 62-296.320(4)(b) F.A.C, General VE Standard]

12. Unconfined Emissions of Particulate Matter (PM): No person shall cause, let, permit, suffer or allow the emissions of unconfined PM from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. [Rule 62-296.320(4)(c), F.A.C.]

13. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department, such as:
    a. Maintaining tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.
    b. Prevent excessive drafts or air turbulence around exposed VOC.
    c. Where possible and practical, use tightly fitting covers for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use.
    d. All valves, fittings, lines, etc. shall be properly maintained.
    e. All spills of VOC should be attended to as soon as practical.
    f. Use of high solids inks and coatings when available and meet customer specifications
    g. Proper operation and maintenance of the capture system and RTO to minimize uncontrolled emissions from the process.

14. RTO Design Information: The permittee shall submit to the Permitting Authority, as soon as it becomes available, the design information for the RTO selected to control the new aluminum bottle coating line. The manufacturer's information shall include the minimum design destruction efficiency for VOC and HAPs, minimum operation temperature, performance curves, residence time and temperature profile, maximum heat input rate, and design air flow rate. [Rule 62-4.070(3), F.A.C.]

A. Aluminum Bottle Coating Line No. 6 (EU-015)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
015	Aluminum Bottle Coating Line No. 6 controlled by an RTO

Aluminum Bottle Coating Line No. 6 is a 16-ounce aluminum bottle coating line rated at 2,250 bottles per minute. The production line has three cuppers, fifteen body makers, two wet can elevators, two washers, three basecoaters, three printer/decorators, eight inside spray machines, fifteen neckers, and three rinsers.

{Permitting Note: In accordance with Rule 62-212.400(PSD), F.A.C., the above emission unit is subject to Best Available Control Technology (BACT) determinations for the following pollutant: VOC. The final BACT determinations are presented in Appendix E of this permit.}

EQUIPMENT

1. Coating Line No. 6: The permittee is authorized to install and operate one new aluminum bottle coating line. Specifically, the permittee is authorized to install:
   a. Three cuppers;
   b. Fifteen body makers;
   c. Two wet can elevators;
   d. Two washers;
   e. Three basecoaters;
   f. Three printer/decorators;
   g. Eight inside spray machines;
   h. Fifteen neckers; and
   i. Miscellaneous supporting emissions sources such as natural gas-fired ovens for the washers and rinsers, natural-gas fired water heaters, UV bottom coaters, and ink dot and video jet coders.

   [Application No. 0310097-010-AC and Rule 62-210.200(PTE), F.A.C.]

2. Control Equipment and Capture System Design: The permittee shall install and operate a new RTO with a minimum design destruction efficiency of 95%. The captured emissions from the basecoaters, printer/decorators, and inside spray lines shall be vented to the RTO at all times. In addition, the permittee shall install and operate a capture and collection system with a minimum overall design capture efficiency of 73% from the basecoaters, printer/decorators, and inside spray operations. The permittee may operate a different capture and destruction efficiency combination in order to demonstrate an overall VOC emissions reduction efficiency of 69% (R = 0.95 x 0.73). The overall emissions reduction efficiency shall be calculated as the product of the capture efficiency and the destruction efficiency.

   {Permitting Note: The overall capture efficiency of 73% from the basecoaters, printer/decorators, and inside spray operations is based on initial design estimates of 80% capture from the inside spray operations, and 65% capture from the basecoaters and printer/decorator operations. This capture and destruction efficiency combination results in an overall emissions reduction of 346.5 TPY of VOC, or a 69% overall emissions reduction.}

   [Rule 62-212.400(10)(c), F.A.C. and Application No. 0310097-010-AC]

3. Capture Efficiency: Results of the initial capture efficiency test required by **Specific Condition 9** shall be reported to the Permitting Authority within 45 days of completion. After review of the initial test results and in consultation with the permittee, the Department may adjust the minimum capture efficiency requirement and emission limits based on the as-built specifications and performance test results.

   [Rule 62-297.450, F.A.C. and Application No. 0310097-010-AC]

A. Aluminum Bottle Coating Line No. 6 (EU-015)

PERFORMANCE RESTRICTIONS

4. Permitted Capacity: The maximum design capacity for Coating Line No. 6 shall be limited to 2,250 bottles per minute and 1,182.6 million bottles per twelve (12) consecutive month period.

   [Rule 62-210.200(PTE), F.A.C.]

5. Authorized Fuel: The permittee is authorized to burn only natural gas in the ovens.

   [Application No. 0310097-010-AC and Rules 62-210.200(PTE) and 62-212.400, F.A.C.]

6. Restricted Operation: The hours of operation of this emission unit are not limited (8,760 hours per year).

   [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

7. VOC and HAP Annual Emissions Limits:
   a. VOC emissions from the basecoaters, printer/decorators, and inside spray machines shall not exceed 156.2 tons in any twelve (12) consecutive month period. [Rule 62-212.400, F.A.C.]
   b. HAP emissions from basecoaters, printer/decorators, and inside spray machines shall not exceed 1.50 tons in any twelve (12) consecutive month period. Total HAP emissions from Aluminum Bottle Coating Line No. 6 shall not exceed 4.28 tons in any twelve (12) consecutive month period.
   c. Compliance with the emission limits in 7.**a.** and 7.**b.** above shall be demonstrated by material balance calculations using the records required to be kept under **Specific Condition 20** of this permit.

   {Permitting Note: These emission limits are based on the following estimated maximum annual material usage rates: Basecoat: 96,780 gal; Ink: 26,433 gal; Overvarnish: 157,934 gal; Inside Spray: 433,568 gal}

   [Application No. 0310097-010-AC and Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

8. VOC Emissions Limits:
   a. *Best Available Control Technology*. The permittee shall comply with the following emission limitations:
      1. 0.11 kilogram of VOC per liter of coating solids from each exterior basecoating operation;
      2. 0.35 kilogram of VOC per liter of coating solids from each overvarnish coating operation; and
      3. 0.20 kilogram of VOC per liter of coating solids from each inside spray coating operation.
   b. *NSPS Subpart WW*. The permittee shall not discharge or cause to be discharged VOC emissions to the atmosphere that exceed the following volume-weighted calendar-month average emissions:
      1. 0.29 kilogram of VOC per liter of coating solids from each exterior basecoating operation;
      2. 0.46 kilogram of VOC per liter of coating solids from each overvarnish coating operation; and
      3. 0.89 kilogram of VOC per liter of coating solids from each inside spray coating operation.

   [40 CFR 60.492, Rule 62-212.400(10)(c), F.A.C., and Application No. 0310097-010-AC]

TESTING REQUIREMENTS

9. Initial Compliance Tests: This emissions unit shall be tested to demonstrate initial compliance with the capture efficiency and destruction efficiency requirements in **Specific Condition 2**. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [40 CFR 60.8(a) and Rules 62-297.310(8)(b)1. and 62-297.450, F.A.C.]

10. Annual Compliance Tests: During each calendar year (January 1st to December 31st), this emissions unit shall be tested to demonstrate compliance with the destruction efficiency requirement. The test method shall be EPA Method 25A/B while simultaneously measuring the RTO inlet and outlet concentrations.

    [Rule 62-297.310(8)(a)1., F.A.C.]

11. Capture Efficiency Testing at Permit Renewal: This emissions unit shall be tested to demonstrate compliance with the capture efficiency requirements in **Specific Condition 2** or the adjusted capture efficiency requirements per **Specific Condition 3** no later than 270 days prior to Title V permit renewal. [Rule 62-297.310(8)(b)1., F.A.C.]

12. Conditions During Capture Efficiency Testing: To preserve the same capture efficiency as tested, the permittee shall operate and maintain the building enclosure and capture system in the same manner as during the most recent successful capture efficiency test. The conditions in place during the capture testing (e.g., internal enclosures, damper positions, closed windows, blocked vents, etc.) shall be maintained during the operation of Coating Line No. 6 until such time that another capture efficiency test takes place that does not utilize these conditions. [Rules 62-4.070(3), 62-297.450(3)(c) and 62-210.200(PTE), F.A.C]

13. Changes to Capture System: If any physical or operational change is made to the capture system, the owner or operator shall notify the Compliance Authority of the change within ten (10) working days after making such change. The Department shall require the owner or operator of the affected activity, process, or emissions unit to conduct a new capture efficiency test if the Department has reason to believe (based on engineering calculations or empirical evidence) that a physical or operational change made to the capture system has decreased the overall emissions reduction efficiency of the system.

    [Rules 62-4.070(3), 62-297.450(3)(c) and 62-210.200(PTE), F.A.C]

14. Test Requirements: The permittee shall submit a preliminary test schedule to the Compliance Authority at least 30 days prior to any required performance tests. For capture efficiency tests, the permittee shall include a test protocol with the preliminary test schedule including a list of procedures that will be used for the capture efficiency test. A copy of the test protocol shall be kept at the facility. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

    If any change to the test schedule is necessary, the owner or operator shall notify the Compliance Authority in writing at least 15 days prior to the date on which each required emissions test is to begin, unless shorter notice is agreed to by the Compliance Authority. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the Compliance Authority a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the Compliance Authority by mutual agreement.

    [40 CFR 60.8(d) and Rules 62-297.310(9) and 62-297.450(3)(a), F.A.C.]

15. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
24/24A	Determination of VOC Content, Water Content, Density, Volume Solids, And Weight Solids Of Surface Coatings / Determination of VOC Content and Density of Publication Rotogravure Inks
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization Detector)
25B	Method for Determining Gaseous Organic Concentrations (Nondispersive Infrared Analyzer)
204A	Volatile Organic Compounds Content in Liquid Input Stream
204B	Volatile Organic Compounds Emissions in Captured Stream
204F	Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach)

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

16. RTO Temperature: The permittee shall install, calibrate, maintain, and operate a continuous temperature measurement device to continuously monitor and record the combustion temperature in the combustion chamber of the RTO. The device shall have an accuracy of 0.75 percent of the temperature being measured, or ±5 °F, whichever is greater. The permittee shall monitor and record the 3-hour average combustion temperature during the initial and annual destruction efficiency tests. Operation at more than 50 °F below the 3-hour average temperature recorded during the most recent successful destruction efficiency test shall constitute a violation of the minimum destruction efficiency requirement in **Specific Condition 2.** The permittee shall maintain, at the facility, daily records of the combustion chamber temperature.

    [40 CFR 60.494, 60.495, and Rule 62-4.070(3), F.A.C.]

17. Coating Application Rate: The permittee shall install, calibrate, maintain, and operate coating monitoring equipment so as to determine each coating's application rate to within 10 percent of its true value. The process measurement equipment shall be operated and maintained in accordance with the manufacturer's recommendations. If necessary, the permittee may propose an alternative process rate measurement methodology for review and approval by the Department.

    [Rule 62-297.310(6)(b), F.A.C. and 62-4.070(3), F.A.C.]

18. VOC Data Sheets: The permittee shall determine the "as-supplied" and "as-applied" VOC content of each batch of coating using EPA Method 24/24A, incorporated and adopted by reference in Chapter 62-297, F.A.C., or an alternative method approved by the Department pursuant to Chapter 62-297.620, F.A.C. The permittee may use the coating manufacturer's actual batch formulation data along with the forms and instructions of EPA document EPA-450/3-84-019 entitled "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings" as a test method in lieu of EPA Method 24/24A to determine the VOC content of each batch of coating. Notwithstanding such determination, in the event of conflicting results, EPA Method 24/24A shall take precedence. If the permittee used formulation data supplied by the manufacturer of the coating to determine VOC content, the Department may require that the permittee use EPA Method 24 or an alternative approved method. If no thinners or solvents are added to a coating, the "as-supplied" VOC content may be used in lieu of determining the "as-applied" VOC content. For EPA Method 24/24A, the coating sample must be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the coating material.

    [40 CFR 60.493(b)(1) and 40 CFR 60.496]

RECORDS AND REPORTS

19. Monthly Coating Compliance Records: Following the initial performance test, the permittee shall follow the following compliance procedures each month in order to demonstrate compliance with the emissions standards in **Specific Conditions 8.a**. and **8.b**. Records shall be kept for a period of five (5) years and be made available for inspection by the Department upon request.

    a. Determine the overall reduction efficiency (R) for the capture system and control device using the **Equation 1**:

$$R = DE \times CE \qquad \textbf{Equation 1}$$

Where: R = the overall emission reduction efficiency for an affected facility (exterior basecoat operation, overvarnish coating operation, or inside spray operation, percent)

DE = VOC destruction efficiency of the control device (percent)

CE = VOC capture efficiency of the collection system for each affected facility (percent)

b. Calculate the volume-weighted average of the total mass of VOC per volume of coating solids (G) used during the calendar month for the affected facility for each type of coating (basecoat, overvarnish, inside spray) using **Equations 2**, **3,** and **4**.

$$M_o + M_d = \sum_{i=1}^{n} L_{ci}\, D_{ci} W_{oi} + \sum_{j=1}^{m} L_{dj} D_{dj}$$ **Equation 2**

Where 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 = 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)

n = number of coatings used in a calendar month

m = number of solvents added to coatings in a calendar month

$$L_s = \sum_{i=1}^{n} L_{ci}\, V_{si}$$ **Equation 3**

Where L_s = the volume of coating solids consumed (liters)

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

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

$$G = \frac{M_o + M_d}{L_s}$$ **Equation 4**

c. Calculate the volume-weighted average of VOC emissions discharged to the atmosphere (N) during the calendar month by the following **Equation 5**:

$$N = G \times [1 - R]$$ **Equation 5**

d. If the volume-weighted average of mass of VOC emitted to the atmosphere for the calendar month (N) is equal to or less than the applicable emission limit specified under §60.492 (**Specific Condition 8**), the coating line is in compliance for that specific type of coating.

[40 CFR 60.493 and Rule 62-213.440(1)(b)2., F.A.C.]

20. Recordkeeping: The permittee shall keep monthly and rolling 12-month records of the following material/fuel usage, production rates and VOC/HAP emissions from the basecoat, ink, overvarnish, and inside spray operations**.**

a. Amount of each type of coating (basecoat, ink, overvarnish, and inside spray) used in each calendar month (gallons)

b. Amount of cleanup solvent used in each calendar month (gallons)

c. Weighted-average VOC and HAP content of each type of coating and cleanup solvent used in each calendar month (lb/gal)

d. Total natural gas usage per calendar month (million cubic feet)

e. Monthly and rolling twelve-month totals of aluminum bottle production for Coating Line No. 6.

f. Total VOC emissions per calendar month (tons)

g. Total HAP emissions per calendar month (tons)

These records shall be used for reporting rates and emissions in the Annual Operating Report, as the basis for paying Title V fees, and demonstrating compliance with the VOC and HAP emissions limits specified in this subsection. These records shall be kept for a period of five (5) years and be made available for inspection by the Department upon request.

21. Annual Operating Report: By April 1 of the year following each calendar year, an annual operating report shall be submitted to the Division and Northeast District using the DEP's electronic annual operating report software. See also Appendix C for further details.

    [Rules 62-210.370, 62-213.440(1)(b)2. and 62-4.070(3), F.A.C.]

22. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each destruction efficiency test, the report shall include the 3-hour average temperature recorded during the test, and the total mass of VOC per volume of coating solids before and after the RTO. For each capture efficiency test, the report shall include a description of the method used to establish the amount of VOC captured by the capture system, the application rate for each coating in gallons per minute or gallons per hour, and the VOC data sheets for each coating used during the capture efficiency test. The permittee shall maintain a file of all measurements, including performance testing measurements and all other information recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records. [40 CFR 60.7(f) and Rule 62-297.310(10), F.A.C.]

23. Semiannual Reports: Following the initial performance test, the permittee shall identify, record, and submit semiannual reports to the Department of each instance in which the volume-weighted average of the total mass of VOC per volume of coating solids, after the control device, is greater than the limit specified under 40 CFR 60.492 (**Specific Condition 8.b.**) If no such instances occur during a particular 6-month period, a report stating this shall be submitted to the Department. The permittee shall also include in the semiannual report each 3-hour period when bottles were processed, during which the average temperature of the control device was more than 50 °F below the average temperature of the control device during the most recent destruction efficiency performance test. [40 CFR 60.495(b)]

24. Notification of Changes: The permittee shall provide the Department with written notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Department may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4)]

25. Startup, Shutdown, and Malfunction: The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

    At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

    [40 CFR 60.7(b) and 40 CFR 60.11(d)]