



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August 22, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dean E. Pusch
Manager, Regulatory Issues
Environmental Affairs Department
Anheuser-Busch Companies, Inc.
Executives Offices
St. Louis, MO 63118-1852

RE: Metal Container Corporation
Gainesville Lid Plant
Amendment to AC01-185835 and PSD-FL-153-~~428~~

Dear Mr. Pusch:

The Department is in receipt of your letter dated July 1, 1994, requesting that the level for cyclohexane in Specific Condition No. 5 in construction permit, No. AC01-185835 (PSD-FL-153), be revised/amended to reflect current Acceptable Ambient Concentrations for toxic compounds. In addition, it is also requested that the use of an alternate product, end sealant compound DAREX S9357 MHV, be approved.

The Department has evaluated your request and reached the following determination:

- 1) Since total emissions of volatile organic compounds will not exceed the permitted levels, the emissions of n-hexane, a product component designated as a hazardous air pollutant (HAP), will decrease as the result of the use of the new product, DAREX S9357 MHV.
- 2) To revise/amend Specific Condition No. 5 of the permit as follows:

FROM: The acceptable ambient concentration (AAC) levels for the following pollutants shall not be exceeded:

Pollutant	No-Threat Levels (ug/m3)		
	8-hr	24-hr	Annual
n-hexane	1,800	430	--
n-heptane	32,000	15,238	--
cyclohexane	1,000	238	--

Mr. Dean E. Pusch
August 22, 1994
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cyclohexylmethane	32,000	7,619	--
toluene	--	--	2,000
benzene	--	--	0.123
stoddard solvent	5,250	1,250	--

Odor None Objectionable

TO: The Acceptable Ambient Concentration levels for the following pollutants shall not be exceeded:

Pollutant	Acceptable Ambient Concentration (ug/m3)		
	8-hr	24-hr	Annual
n-hexane	1,760	422.4	200
toluene	--	--	300
benzene	--	--	0.123

Odor None Objectionable

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;

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- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

A copy of this letter shall be filed with the construction permits, Nos. AC01-185835 and PSD-FL-153(A), and shall become a part of the permits.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/pm

Attachment to be Incorporated:

Mr. Dean E. Pusch's letter of July 1, 1994.

cc: Johnny Cole, NED
Jewell Harper, EPA
John Bunyak, NPS

Mr. Dean E. Pusch
August 22, 1994
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CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 8/25/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is
hereby acknowledged.

Barbara J. Pontwell 8/25/94
Clerk Date

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3 and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1 Addressee's Address

2 Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Dean E. Pusch
Manager, Regulatory Issues
Environmental Affairs Department
Anheuser-Busch Companies, Inc.
Executive Offices
St. Louis, MO 63118-1852

4a. Article Number
P. 872 562 707

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
8/30/94

5. Signature (Addressee)

6. Signature (Agent)
[Signature]

8. Addressee's Address Only if requested and fee is paid

PS Form 3811, December 1991 U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service

P 872 562 707



Receipt for Certified Mail


No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Mr. Dean E. Pusch	
Street and No. Executive Offices	
P.O., State and ZIP Code St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8/25/94 AC01-185835 and PSD-FL-153(A)	

PS Form 3800, JUNE 1991

Memorandum

Florida Department of
Environmental Protection

TO: Howard Rhodes
FROM: Clair Fancy 
DATE: August 22, 1994
SUBJECT: Metal Container Corporation's Gainesville Lid Plant
Amendment to AC01-185835 and PSD-FL-153(A)

Metal Container Corporation has requested that the referenced permits for its Gainesville Lid Plant be revised/amended to change Specific Condition No. 5 to reflect the current Acceptable Ambient Concentration level for cyclohexane; and, to use an alternate end sealant compound product. Hexane is listed as a hazardous air pollutant (HAP) pursuant to Chapter 17-213, F.A.C. Only those compounds that are currently listed as regulated pollutants, either as a HAP or 112r pollutant, have been retained in the condition, while all others have been deleted. In addition, any reference to "No-Threat Levels" have been deleted. The amendment will not allow an increase in permitted annual emissions of any pollutant.

The Bureau recommends your approval.

CF/TH/pm



Lawton Chiles
Governor

PERMIT WITH FLA DEP
CHANGES THRU 8/29/93

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

PERMITTEE:

Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

I.D. Number: 31GVL01004601
Permit/Cert Number: A001-220792
Date of Issue: March 19, 1993
Expiration Date: January 30, 1998
Revision: 7-2-93
County: Alachua
Latitude/Longitude: 29°42'05"N; 82°20'53"W
Project: Lid Modules 4 -7 and
Off-Line Conversion
Presses
UTM: E-(17)369.38; N-3287.23

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-210, 17-212, 17-272, 17-296, 17-297 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the operation of Lid Module Nos. 4,5,6 & 7 and Off-Line Conversion Presses at an aluminum lid manufacturing facility.

Located at 5909 N.W. 18th Drive, Gainesville, Alachua County, Florida.

In accordance with:

Construction Permit No. AC01-185835
Certificate of Completion of Construction received 10-23-92
Additional information received 12-21-92

PERMITTEE:
Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

I.D. Number: 31GVLO1004601
Permit/Cert: A001-220792
Date of Issue: March 19, 1993
Revised:
Expiration Date: January 30, 1998

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:
Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

I.D. Number: 31GVL01004601
Permit/Cert: A001-220792
Date of Issue: March 19, 1993
Revised:
Expiration Date: January 30, 1998

GENERAL CONDITIONS:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

PERMITTEE:
Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

I.D. Number: 31GVL01004601
Permit/Cert: A001-220792
Date of Issue: March 19, 1993
Revised:
Expiration Date: January 30, 1998

GENERAL CONDITIONS:

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards
- () (Section 401, PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall, within a reasonable period of time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
 Metal Container Corporation
 5909 N.W. 18th Drive
 Gainesville, Florida 32606

I.D. Number: 31GVL01004601
 Permit/Cert: A001-220792
 Date of Issue: March 19, 1993
 Revised:
 Expiration Date: January 30, 1998

SPECIFIC CONDITIONS:

1. The permitted materials and utilization rates are as stated in the Construction Permit application. These rates include but are not limited to:

- A maximum annual production of 10.047 billion lids.
- A maximum usage rate (all coatings and solvents) of 0.0241 gallons/1000 lids.
- A maximum input rate of 9450 lbs/hr aluminum shell and tab stock.

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.

3. The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in SC No. 1. After testing at a higher rate, the operating rate shall continue to not exceed the aforementioned rate until the test report at the higher rate is reviewed and accepted by the Department.

4. The maximum VOC content of the coatings and solvents used in this operation shall not exceed the following limits:

<u>3.2 lbs VOC</u>	<u>6.0 lbs VOC</u>
gal end sealant	gal tab lube
(excluding water)	(excluding water)

Clean up Solvent: 6.32 lbs VOC and 5.84 lbs VOC
 gal mineral spirits gal heptane

5. The acceptable ambient concentration (AAC) levels for the following pollutants shall not be exceeded:

Pollutant	No-Threat Levels (ug/m3)		
	8-hr	24-hr	Annual
n-hexane	1,800	430	--
n-heptane	32,000	15,238	--
cyclohexane	1,000	238	--
cyclohexylmethane	32,000	7,619	--
toluene	--	--	2,000
benzene	--	--	0.123
stoddard solvent	5,250	1,250	--
Odor	None Objectionable		

PERMITTEE:
Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

I.D. Number: 31GVL01004601
Permit/Cert: A001-220792
Date of Issue: March 19, 1993
Revised:
Expiration Date: January 30, 1998

SPECIFIC CONDITIONS:

6. The total permitted VOC emissions from coatings and organic solvents shall not exceed the following limits:

	<u>lbs/hr</u>	<u>tons/yr</u>
Module 4	15.9	65.4
Module 5	32.9	135.2
Module 6	32.9	135.2
Module 7	29.8	122.1
Off-line Conversion Presses	6.4	26.1
Entire Facility	118	484

7. This facility is allowed to operate continuously (8760 hours per year).
8. The permittee shall maintain accurate records of all coatings and solvents used in operation at the facility for at least a two year period after their use.
9. New coatings or solvents or the same material provided by a different manufacturer shall only be allowed if they contain either the same or a smaller amount of each of the VOC's that are permitted for the replaced material and if they do not contain VOC's that are not permitted for that material. Material Safety and Data Sheets shall be maintained for all materials that are used.
10. The permittee shall maintain a record of the clean up solvents used and the waste solvents hauled off site on a semester basis. A composite sample of the VOC content in the waste solvents shall be established every six months using EPA Method 24 or 24A as contained in 40 CFR 60, and adopted by reference in FAC Rule 17-297.
11. The permittee shall notify the Northeast District office in writing at least 30 days prior to any testing performed by the permittee. Compliance test results shall be submitted to the Northeast office no later than 45 days after the final test run.
12. When the Department, after investigation, has good reason (such as odor complaints, increased visible emissions, etc.), to believe that any applicable emission standard contained in Chapter 17-296, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of the tests to the Department.
13. The following procedures shall be utilized to minimize pollutant emissions, but shall not be limited to:
- ° maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;
 - ° where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC so that it can be covered when not in use;

PERMITTEE:
Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

I.D. Number: 31GVL01004602,03,04,05
Permit/Cert: A001-220792
Date of Issue:
Expiration Date: January 30, 1998

SPECIFIC CONDITIONS:

SC No. 13 Cont'd.

- ° all fittings, valve lines etc., shall be properly maintained; and,
- ° all VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

14. Compliance shall be determined by recording the following data for each material used:
- a.1 amount
 - b.2 density (lbs/gal)
 - c. VOC factor (% by wt and type)
 - d. time factor (hrs)
 - e. total cumulative emissions (in tons for each VOC)
 - f. emissions rate (lbs/hr, lbs/day, lbs/month, tons/yr)
- 1Maintain a file of plant usage logs
2Maintain a file of mfr. spec's data
15. Submit an Annual Operations Report for this source that demonstrates compliance by providing a record of the data required in Specific Condition #14. Also include a copy of the mfr. spec's data sheet(s) for each material used.
16. In each test report, submit the maximum lid production and input rate at which this source was operated since the most recent test.
17. The Annual Operations Report shall be submitted on the form supplied by the Department for each calendar year on or before March 1.
18. The ID No. and ID Name for this source is to be used on all correspondence.
19. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
20. Forms for renewal will be sent 5 months prior to 01-30-98 and the completed forms with the test results are due 90 days prior to 01-30-98.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Ernest E. Frey, P.E.
Director of District Management