



ANHEUSER-BUSCH COMPANIES

January 9, 1991

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DER-BAQM

Ms. Teresa Heron
Bureau of Air Quality Management
Department of Environmental Regulations
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32301

Re: **Metal Container Corporation -
Gainesville Lid Plant**

Dear Ms. Heron:

This letter presents the chronology of the air permitting activities at the referenced facility as you requested.

Modules 1, 2, and 3 received the original permit to operate in May 1983. Module 4 received an operating permit in August 1985. The operating permit for all four modules was renewed in November 1986 and contained an annual VOC emission limit of 239.2 tons.

Module 5 was included in operating permit A001-144728, issued in October 1988. This permit contained a facility-wide VOC limit of 235.6 tons per year. The emissions decrease was due to a change in the VOC content of material used at the facility.

In September 1989, construction permit AC-159034 was issued for Module 6. This permit allowed an additional 87.4 tons of VOC per year, bringing the facility-wide total to 323.0 tons of VOC per year. This construction permit was revised in March 1990 to incorporate the 13th conversion press, with no change in permitted emissions.

The application for the construction permit for the modernization project, which is currently under review, was submitted on August 29, 1990.

Anheuser-Busch Companies, Inc.
Executive Offices
One Busch Place
St. Louis, MO U.S.A. 63118-1852
Telex 447 117 ANBUSCH STL

Page 2

If you have any questions regarding this information, please call me at (314) 577-4162.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

A handwritten signature in cursive script that reads "Dean E. Pusch". The signature is written in dark ink and is positioned below the typed name of the sender.

Dean E. Pusch
Sr. Environmental Scientist
DEP:cd
DEP10990

AIR QUALITY MODELING STUDY
OF THE METAL CONTAINER
CORPORATION LID MANUFACTURING
FACILITY
GAINESVILLE, FLORIDA

(REVISED)

Prepared for:

ANHEUSER-BUSCH COMPANIES, INC.
St. Louis Missouri

Prepared by:

ECT

Environmental Consulting & Technology, Inc.

Gainesville, Florida

90100-0100

December 17, 1990

PREFACE

This revised report replaces the original modeling study report, which was dated July 27, 1990. Subsequent to the completion of the original study, and its submittal to the Florida Department of Environmental Regulation (FDER), more detailed engineering design work related to the proposed plant modification has resulted in changes that would affect stack and emission characteristics. These changes were factored into the revised modeling study, the results of which are contained in this updated report. The revised modeling has shown that the effect of the changes will be to reduce maximum n-hexane impacts to levels below FDER's "no-threat levels."

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1.0 INTRODUCTION AND SUMMARY

Metal Container Corporation (MCC), an Anheuser-Busch company, owns and operates a lid manufacturing facility in Gainesville, Florida. The facility is located in a commercial area of northeast Gainesville, just southeast of the intersection of State Road 121 and US 441. The site location is shown in Figure 1-1.

MCC proposes to expand the production capability of the facility by adding to the existing building and adding new manufacturing equipment. Associated with the increase in production will be an increase in emissions of volatile organic compounds (VOCs) from building vents and exhausts. The principal VOC of interest is n-hexane, which is contained in solvents and end sealants used in the manufacturing process.

The compound n-hexane is considered by FDER to have the potential to cause human health effects if present in high enough concentrations. As such, it is listed by FDER in their Air Toxics Permitting Strategy (Draft) (FDER, undated). In order to demonstrate that the increase in emissions will not pose a threat to public health, Anheuser-Busch has retained Environmental Consulting & Technology, Inc. to perform a dispersion modeling study, the results of which are contained herein.

The modeling study was performed using emission inputs that are described in Section 2.0 of this report. Maximum potential hourly n-hexane emissions were used. The model and modeling methodologies used were those typically used by FDER. They are described in Section 3.0. The results, summarized in Section 4.0, showed that the facility will not pose a threat to public health. All modeled n-hexane impacts were less than the FDER "no-threat levels." Furthermore, the highest impacts were predicted to occur in close proximity to the facility, at locations zoned for non-residential uses.

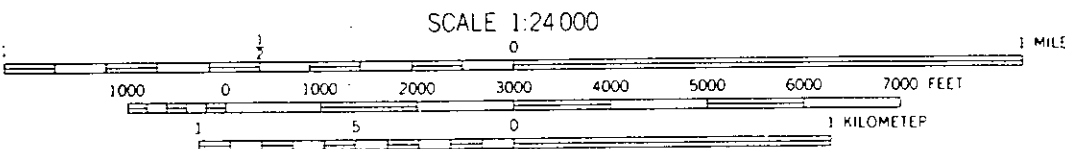
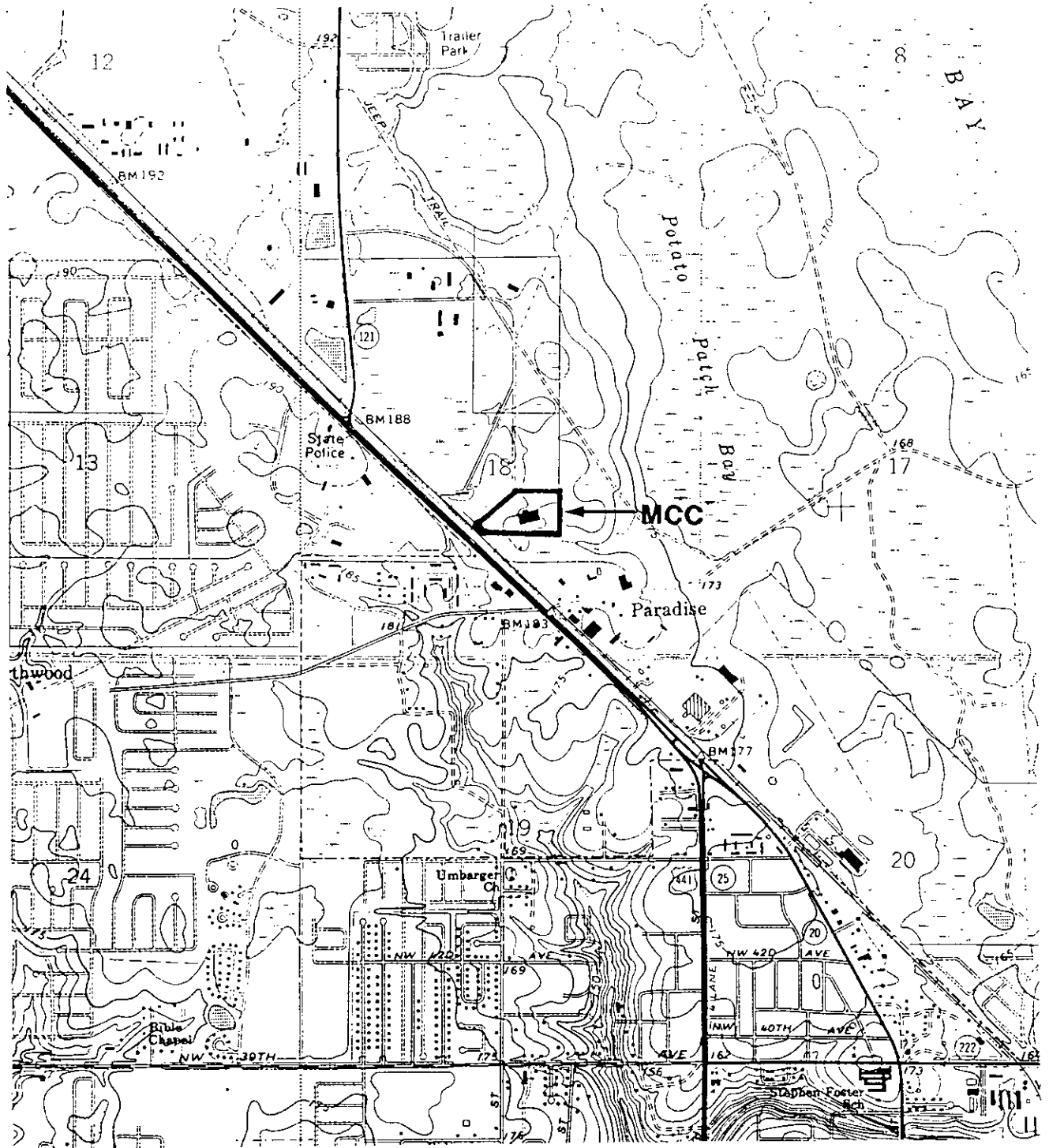


FIGURE 1-1.
 SITE LOCATION MAP
 Source: ECT, 1990.



2.0 FACILITY LAYOUT AND EMISSION PARAMETERS

The layout of the expanded facility is provided in Figure 2-1. Also shown are the locations of all stacks, vents, or exhausts from which n-hexane will be emitted. Emission points numbered 10 through 14 will be added as a direct result of the expansion project. At the same time, the other vents will be modified to improve dispersion characteristics. The modifications involve raising stack heights by 10 feet (ft) for all other sources except Sources 6, 7, and 8, and where possible, changing exhaust orientations from horizontal to vertical.

Source 6 is a ventilation fan that exhausts out the side of the building; it could not be easily altered. Also, due to their operating characteristics, the three new scrap cyclones (Sources 10, 11, and 12) and the two existing vacuum vents (Sources 7 and 8) must have rain caps. Accordingly, they were modeled with no vertical momentum.

Tables 2-1 and 2-2 summarize stack parameters and emission rates used in the modeling. Table 2-1 addresses the summer operating scenario, while Table 2-2 addresses winter operations, when Sources 1 through 3 will not be in use. Rates of n-hexane emissions from each individual vent or exhaust were calculated in proportion to exhaust flow rate. Total facility emissions of n-hexane, with the expansion, are projected to be 26.8 pounds per hour (lb/hr) (maximum), based on manufacturer's data on the solvents and end sealants. (Note that Source 4 is not used.)

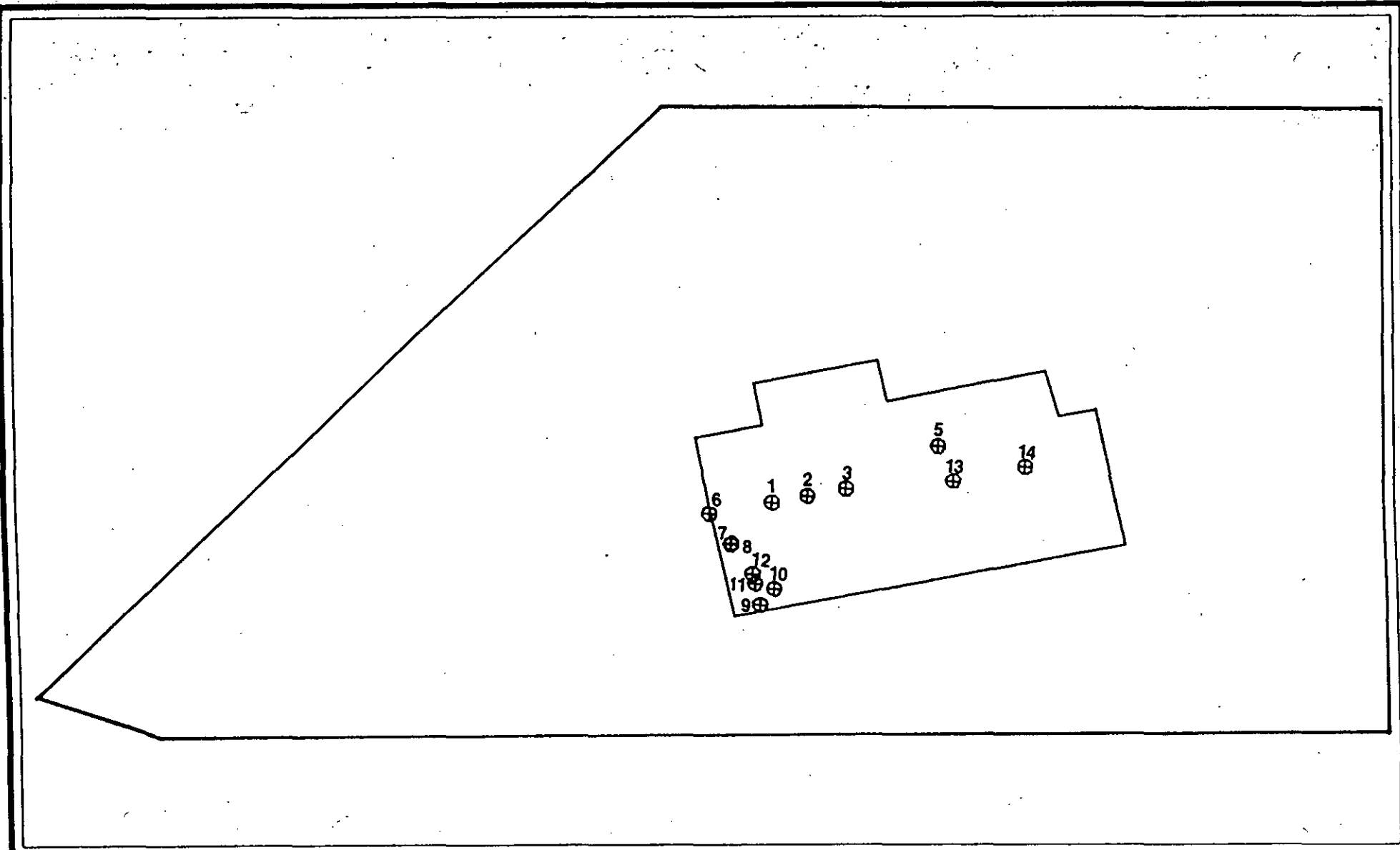


FIGURE 2-1.

FACILITY LAYOUT AND EMISSION POINT LOCATIONS

Source: ECT, 1990.



Environmental Consulting & Technology, Inc.

Table 2-1. Summary of Stack Parameters and Emission Rates: Summer Operation

Source No.	Exhaust Flow (acfm)	Emission Rate		Stack Ht.		Exhaust Temp.		Exit Vel.		Stack Diameter	
		lb/hr	g/sec	ft	m	°F	°K	ft/sec	m/sec	in	m
1	18,000	3.25	0.410	36.7	11.2	80	300	42.4	12.9	36	0.91
2	18,000	3.25	0.410	36.7	11.2	80	300	42.4	12.9	36	0.91
3	18,000	3.25	0.410	36.7	11.2	80	300	42.4	12.9	36	0.91
5	21,450	3.87	0.488	36.7	11.2	80	300	64.0	19.5	32	0.81
6	6,000	1.08	0.137	26.7	8.13	80	300	--	0.01*	--	1.0*
7	1,080	0.19	0.025	31.7	9.65	80	300	--	0.01*	--	1.0*
8	1,080	0.19	0.025	31.7	9.65	80	300	--	0.01*	--	1.0*
9	6,750	1.22	0.154	36.7	11.2	80	300	63.7	19.4	18	0.46
10	6,000	1.08	0.137	36.7	11.2	80	300	--	0.01*	--	1.0*
11	7,000	1.26	0.159	36.7	11.2	80	300	--	0.01*	--	1.0*
12	9,100	1.64	0.207	36.7	11.2	80	300	--	0.01*	--	1.0*
13	18,000	3.25	0.410	36.7	11.2	80	300	53.7	16.4	32	0.81
14	18,000	3.25	0.410	36.7	11.2	80	300	53.7	16.4	32	0.81

*Artificial parameters to simulate a non-vertical exhaust orientation.

Source: A-B, 1990.
ECT, 1990.

5

Table 2-1. Summary of Stack Parameters and Emission Rates: Summer Operation

Source Number	Exhaust Flow (acfm)	Emission Rate		Stack Height		Exhaust Temperature		Exit Velocity		Stack Diameter	
		lb/hr	g/sec	ft	meter	°F	°K	ft/sec	m/sec	inch	meter
1	18,000	3.25	0.410	36.7	11.2	80	300	42.4	12.9	36	0.91
2	18,000	3.25	0.410	36.7	11.2	80	300	42.4	12.9	36	0.91
3	18,000	3.25	0.410	36.7	11.2	80	300	42.4	12.9	36	0.91
5	21,450	3.87	0.488	36.7	11.2	80	300	64.0	19.5	32	0.81
6	6,000	1.08	0.137	26.7	8.13	80	300	--	0.01*	--	1.0*
7	1,080	0.19	0.025	31.7	9.65	80	300	--	0.01*	--	1.0*
8	1,080	0.19	0.025	31.7	9.65	80	300	--	0.01*	--	1.0*
9	6,750	1.22	0.154	36.7	11.2	80	300	63.7	19.4	18	0.46
10	6,000	1.08	0.137	36.7	11.2	80	300	--	0.01*	--	1.0*
11	7,000	1.26	0.159	36.7	11.2	80	300	--	0.01*	--	1.0*
12	9,100	1.64	0.207	36.7	11.2	80	300	--	0.01*	--	1.0*
13	18,000	3.25	0.410	36.7	11.2	80	300	53.7	16.4	32	0.81
14	18,000	3.25	0.410	36.7	11.2	80	300	53.7	16.4	32	0.81

*Artificial parameters to simulate a non-vertical exhaust orientation.

Source: A-B, 1990.
ECT, 1990.

Table 2-2. Summary of Stack Parameters and Emission Rates: Winter Operation

Source Number	Exhaust Flow (acfm)	Emission Rate		Stack Height		Exhaust Temperature		Exit Velocity		Stack Diameter	
		lb/hr	g/sec	ft	meter	°F	°K	ft/sec	m/sec	inch	meter
1*	0	0.0	0.0	36.7	11.2	--	--	--	--	36	0.91
2*	0	0.0	0.0	36.7	11.2	--	--	--	--	36	0.91
3*	0	0.0	0.0	36.7	11.2	--	--	--	--	36	0.91
5	21,450	6.09	0.767	36.7	11.2	80	300	64.0	19.5	32	0.81
6	6,000	1.70	0.215	26.7	8.13	80	300	--	0.01 ⁺	--	1.0 ⁺
7	1,080	0.31	0.039	31.7	9.65	80	300	--	0.01 ⁺	--	1.0 ⁺
8	1,080	0.31	0.039	31.7	9.65	80	300	--	0.01 ⁺	--	1.0 ⁺
9	6,750	1.92	0.242	36.7	11.2	80	300	63.7	19.4	18	0.46
10	6,000	1.70	0.215	36.7	11.2	80	300	--	0.01 ⁺	--	1.0 ⁺
11	7,000	1.99	0.250	36.7	11.2	80	300	--	0.01 ⁺	--	1.0 ⁺
12	9,100	2.58	0.326	36.7	11.2	80	300	--	0.01 ⁺	--	1.0 ⁺
13	18,000	5.11	0.644	36.7	11.2	80	300	53.7	16.4	32	0.81
14	18,000	5.11	0.644	36.7	11.2	80	300	53.7	16.4	32	0.81

*Sources 1 through 3, associated with summer building ventilation, will not operate in the winter.
⁺Artificial parameters to simulate a non-vertical exhaust orientation.

Source: A-B, 1990.
 ECT, 1990.

3.0 MODELING APPROACH

Since the averaging times of interest for n-hexane are 8-hour and 24-hour, the Industrial Source Complex Short-Term (ISCST) model was selected. This model is classified by the U.S. Environmental Protection Agency (EPA) (1986) as a preferred model and is also recommended by FDER.

The ISCST model was used in the rural mode since the area surrounding the MCC facility is largely wooded and undeveloped. Also, since the terrain in the area is generally flat, no terrain elevations were used.

A receptor grid with 50-meter spacing between receptor points was used in the modeling study. The grid was placed to capture the highest off-property n-hexane concentrations resulting from the expanded operations. The orientation of the grid is illustrated in Figure 3-1.

All of the stacks and vents have heights less than 2.5 times the height of the building. Following EPA (1987) guidance, it was determined that direction-specific downwash parameters would apply to all stacks. Downwash parameters were calculated with the aid of the "GEP" program (BEE, undated).

One year of surface meteorological data and concurrent upper air data was used in the modeling study. Consistent with FDER practice, surface data from Tallahassee, Florida, and upper air data from Waycross, Georgia, were used. Data for the year 1986 were chosen since 1986 is the most recent year normally used by FDER.

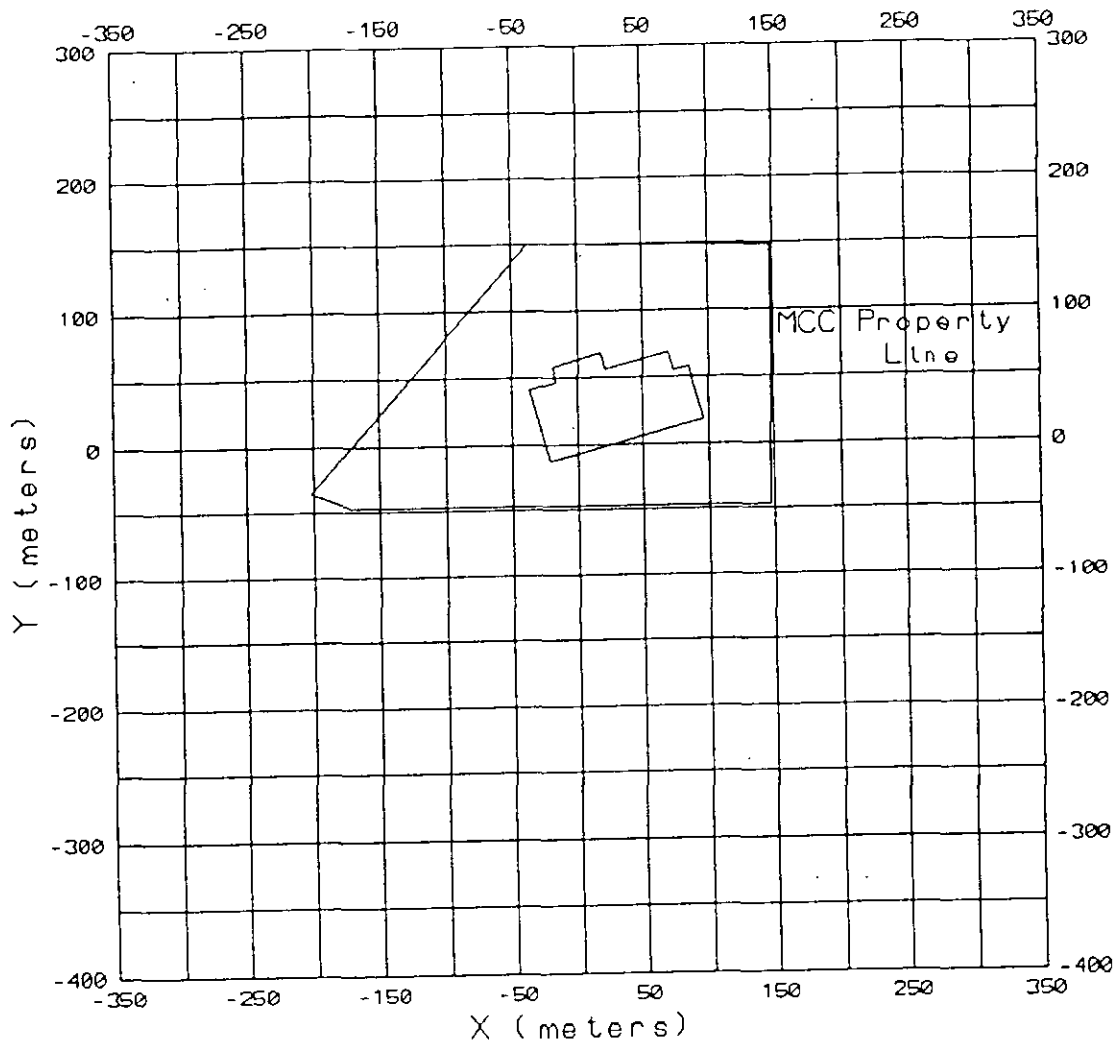


FIGURE 3-1.

MODELING RECEPTOR GRID

Source: ECT, 1990.

ECT
 Environmental Consulting & Technology, Inc.

4.0 MODELING RESULTS

The results of the modeling study are summarized in Tables 4-1 and 4-2. (A diskette containing copies of the ISCST input and output files is appended to this report.) Table 4-1 lists the top five off-property 8-hour n-hexane concentrations, while Table 4-2 lists the top five off-property 24-hour concentrations. In both cases the winter operating scenario resulted in all of the top five impacts. This would be expected since the same amount of emissions was modeled from fewer sources.

As shown, all of the top five 8-hour impacts were found to be less than half the no-threat level, which is $1,800 \mu\text{g}/\text{m}^3$. In addition, all occurred within close proximity to the facility, in an area normally not occupied by potential human receptors. Figure 4-1 illustrates.

Similarly, the highest 24-hour concentration was slightly less than 83 percent of the no-threat level ($430 \mu\text{g}/\text{m}^3$), as shown in Table 4-2. Again, the locations of the highest values were in areas containing no sensitive receptors, as shown in Figure 4-2. All of the highest impacts were predicted to occur on a parcel of land zoned non-residential.

Table 4-1. Top Five Off-Property N-Hexane Concentrations: 8-Hour Averaging Time

Rank	Concentration ($\mu\text{g}/\text{m}^3$)	Receptor Location (m)*		Day	Period
		X	Y		
1	795.8	50	-50	141	3
2	690.1	0	-50	299	1
3	640.2	50	-100	298	3
4	632.4	50	-50	65	3
5	581.2	50	-150	299	1

*See Figure 3-1.

Note: FDER no-threat level = $1,800 \mu\text{g}/\text{m}^3$.

Source: ECT, 1990.

Table 4-2. Top Five Off-Property N-Hexane Concentrations: 24-Hour Averaging Time

Rank	Concentration ($\mu\text{g}/\text{m}^3$)	Receptor Location (m)*		Day
		X	Y	
1	355.1	0	-50	299
2	341.1	0	-100	354
3	337.9	-50	-100	348
4	330.0	-100	-50	251
5	329.6	-50	-100	350

*See Figure 3-1.

Note: FDER no-threat level = $430 \mu\text{g}/\text{m}^3$.

Source: ECT, 1990.

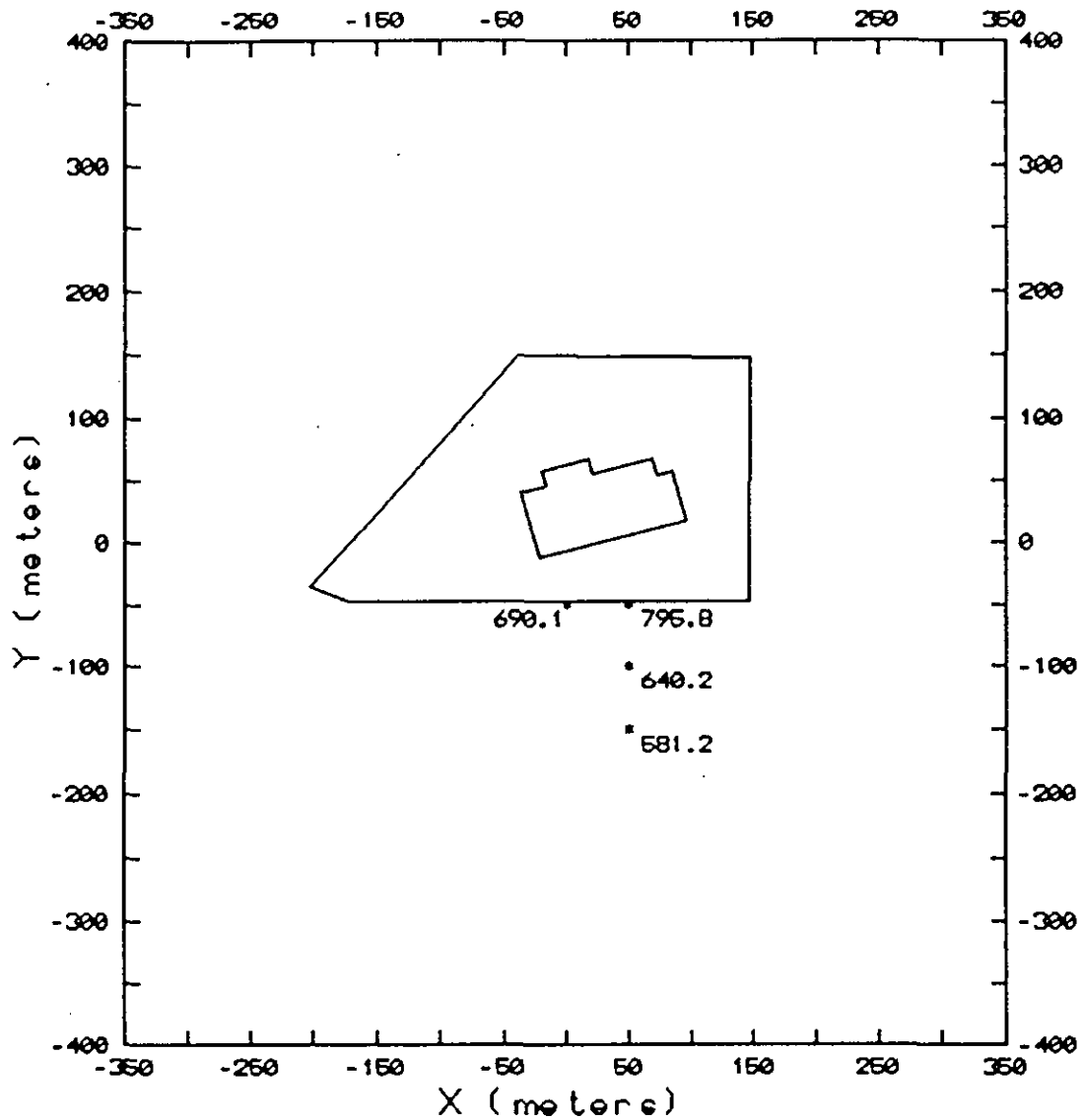


FIGURE 4-1.

LOCATIONS OF TOP FIVE 8-HOUR N-HEXANE
IMPACTS GIVEN IN TABLE 4-1

Source: ECT, 1990.

ECT

Environmental Consulting & Technology, Inc.

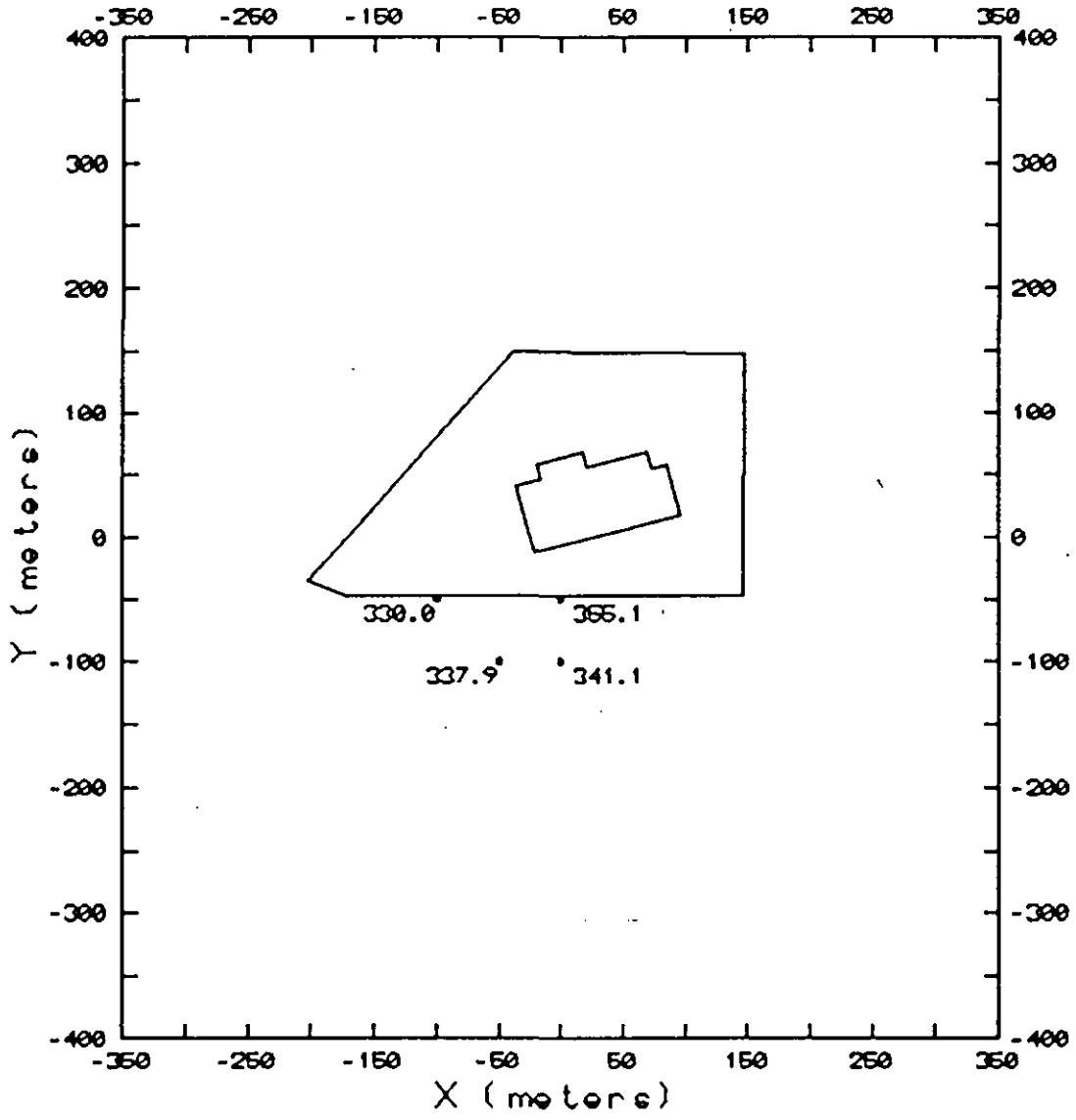


FIGURE 4-2.

LOCATIONS OF TOP FIVE 24-HOUR N-HEXANE IMPACTS GIVEN IN TABLE 4-2

Source: ECT, 1990.



REFERENCES

- Bowman Environmental Engineering (BEE). Undated. GEP Manual. Dallas, TX.
- Florida Department of Environmental Regulation (FDER). Undated. The Florida Air Toxics Permitting Strategy (Draft). Tallahassee, FL.
- U.S. Environmental Protection Agency (EPA). 1986. Guideline on Air Quality Models (Revised). EPA-450/2-78-027R. Research Triangle Park, NC.
- U.S. Environmental Protection Agency (EPA). 1987. Industrial Source Complex (ISC) Dispersion Model User's Guide, Second Edition (Revised). EPA-450/4-88-002. Research Triangle Park, NC.



ANHEUSER-BUSCH COMPANIES

December 10, 1990

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Ms. Teresa Heron
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: **Permit No. AC 01-185835 & PSD-FL-153**
Metal Container Corporation -
Gainesville Lid Plant

Dear Ms. Heron:

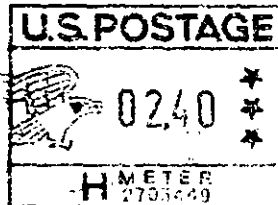
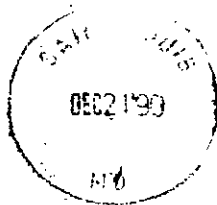
Metal Container Corporation has elected to change the cleanup solvent used at the Gainesville Lid Plant from a hexane-based product to one with a heptane base. This change will reduce emissions of n-hexane at the facility; thereby reducing both worker exposure and ambient off-property impacts.

In addition, the heating ventilating and air conditioning design for the plant modernization has been reassessed, resulting in changes in building exhaust vent configuration. These changes in cleanup solvent usage and the HVAC design affect the information previously submitted in support of the referenced air permit. Thus, this submittal details the revisions to the permit application.

The change from the hexane-based solvent, Amsco 1487, to the heptane-based product, Texsolve C, will result in a decrease in n-hexane emissions of 35.3 tons per year from the facility after the modernization. Attachment A presents the material safety data sheet for Texsolve C, along with correspondence clarifying portions of the MSDS.

Total VOC emissions will increase slightly, from 563.8 tons per year when using Amsco 1487 to 567.2 tons per year with Texsolve C. Attachment B presents facility-wide VOC emissions by module, incorporating the change in solvent.

Since this product switch changes the potential air toxics that will be emitted and the HVAC changes will affect the impacts of the toxics emissions, the air toxics section submitted with the original application has been revised. See



RETURN POSTAGE GUARANTEED

**ANHEUSER-BUSCH COMPANIES, INC.
ST. LOUIS, MO. 63118**

Ms. Teresa Heron
Bureau of Air Regulation
Florida Dept. of Environmental Regula
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attachment C. This attachment includes a revision to the original air quality modeling study. The modeling analysis includes emissions from two vents for the process vacuum system. These vents had inadvertently been omitted from the original modeling study.

The modeling analysis in Attachment C shows that maximum impacts of potential toxics will be below the Department's no-threat levels, thus ensuring protection of public health.

The facility also has several very small sources within the building whose emissions have been included in previous permits and inventories, as well as the original application for the modernization, but previously have not been identified. These sources include two parts cleaners and the end sealant bulk tank and day tank. Details of these sources are presented in Attachment D.

If you have any questions on this information, please don't hesitate to call me at (314) 577-4162.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Dean E. Pusch
Sr. Environmental Scientist
DEP:cd
Attachments
DEP120790-1

c: J. Neuron
C. Halladay
B. Andrews
A. Kutyma, NE Dist
J. Harper, EPA
C. Schuer, WPS
S. Baruch, PER. Boonville

ATTACHMENT A

TEXSOLVE C MATERIAL SAFETY DATA SHEET



Texaco Chemical Company

PO Box 27707
Houston TX 77227 7707
713 961 3711

CC TO MARLENE ACCIARO - MCCC SSH
DEAN BOSCH ABC 202

October 23, 1990

RE: TEXSOLVE C
FOR YOUR REQUEST I TALKED
TO TEXACO AND THIS IS THEIR
RESPONSE.

Ed
11/5/90

Mr. E. B. Katzenmeyer
Manager Industrial Hygiene
Anheuser Busch Corporation
One Busch Place St. Louis, MO 63118

Dear Mr. Katzenmeyer:

I appreciated your bringing to my attention the need for clarification of the composition section in the Material Safety Data Sheet for our TEXSOLVE C (commercial heptane). I agree with you that changes are needed and will propose the following to our Hazard Communication group:

Component	C.A.S. No.	Wt. %	Exposure limits	RO
Heptane	142-82-5	85-90	400 ppm TWA	-
n-Hexane	110-54-3	1-3.99	50 ppm TWA	-
Methylcyclopentane	96-37-7	1-3.99	-	-
Toluene	108-88-3	1-3.99	100 ppm TWA	1000
Cyclohexane	110-82-7	1-3.99	300 ppm TWA	1000
Benzene	71-43-2	0.01	1 ppm TWA	10

I trust that this information will help you to evaluate TEXSOLVE C better. Thank you again for calling.

Sincerely,

F. E. Bentley, Ph.D.
Sr. Coordinator Product Safety

FEB:sgv
23/04

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NOV 08 1990

ENVIRONMENTAL ENGRG.
DEPT.

**INDUSTRIAL HYGIENE, TOXICOLOGY, AND MATERIAL
SAFETY DATA SHEET**



NOTE: NO REPRESENTATION IS MADE AS TO THE ACCURACY OF THE INFORMATION
HEREIN. SEE PAGE 7 FOR CONDITIONS UNDER WHICH DATA ARE FURNISHED.

Trade Name and Synonyms 75726 TEXSOLVE C -	
Manufacturer's Name Texaco Chemical Company	Emergency Telephone No. (409) 722-8381
Address 3040 Post Oak Blvd. P.O. Box 27707 Houston, TX 77056	
Chemical Name and/or Family or Description Commercial heptane	
THIS PRODUCT IS CLASSIFIED AS: _____ CARCINOGENIC BY OSHA, IARC, OR NTP X NOT CARCINOGENIC	
WARNING STATEMENT: DANGER! EXTREMELY FLAMMABLE CAUSES IRRITATION TO EYES MAY CAUSE IRRITATION TO SKIN	
OCCUPATIONAL CONTROL PROCEDURES	
Protective Equipment (Type)	
Eyes:	Chemical type goggles must be worn. Do not wear contact lenses.
Skin:	Protective clothing such as uniforms, coveralls or lab coats should be worn. Launder or dry clean when soiled. Gloves resistant to chemicals and petroleum distillates required.
Inhalation:	Supplied air respiratory protection for cleaning large spills or upon entry into tanks, vessels, or other confined spaces.
Ventilation:	Local exhaust ventilation recommended
Permissible Concentrations:	
Air:	400 ppm averaged over an 8 hour exposure (ACGIH, 1987-88) for n-heptane. 500 ppm PEL OSHA.
EMERGENCY AND FIRST AID PROCEDURES	
First Aid	
Eyes:	Flush thoroughly with water for at least fifteen minutes. Get medical attention.
Skin:	Wash exposed areas with soap and water.
Ingestion:	Do NOT induce vomiting. Aspiration of the fluid can cause serious lung injury, i.e. chemical pneumonitis. CALL A DOCTOR IMMEDIATELY.
Inhalation:	Should symptoms noted under physiological effects occur, remove to fresh air. If not breathing, apply artificial respiration.
Other Instructions:	None.

N.D. - Not Determined
< - Less Than

N.A. - Not Applicable
> - Greater Than



PHYSIOLOGICAL EFFECTS:		Code No.
		75726
Effects of Exposure		
Acute:		
Eyes:	Believed to cause moderate eye irritation.	
Skin:	Believed to be moderately irritating; Believed to cause redness, edema or drying of the skin.	
Respiratory System:	Overexposure to mist, vapors may cause dizziness, drowsiness, headache, nausea. Massive overexposure may cause unconsciousness, death.	
Chronic:	Prolonged or repeated skin contact may cause drying or cracking of skin.	
Other:	-See additional comments pg. 6.	
Sensitization Properties:		
Skin: Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input checked="" type="checkbox"/>	Respiratory: Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input checked="" type="checkbox"/>	
Median Lethal Dose (LD ₅₀ LC ₅₀) (Species)		
Oral	Believed to be > 5 g/kg (rat); practically non-toxic	
Inhalation	N.D.	
Dermal	Believed to be > 3 g/kg (rabbit); practically non-toxic	
Other	N. D.	
Irritation Index, Estimation of Irritation (Species)		
Skin	Believed to be 3-5/8.0 (rabbit); moderately irritating	
Eyes	Believed to be 25-50/110 (rabbit); moderately irritating	
Symptoms of Exposure See above.		
FIRE PROTECTION INFORMATION		
Ignition Temp. ^o F.	399 F	Flash Point ^o F. (Method) 13 F D56
Flammable Limits, (%)	Lower 1.0	Upper 7.0
Products Evolved When Subjected to Heat or Combustion:		
Carbon monoxide and carbon dioxide may be formed on burning in limited air supply.		
Recommended Fire Extinguishing Agents And Special Procedures:		
According to the National Fire Protection Association Guide 325M, use dry chemical, foam or carbon dioxide. Water may be ineffective on the flames, but water should be used to keep fire-exposed containers cool. If a leak or spill has not ignited, use water spray to disperse the vapors and to provide protection for the persons attempting to stop the leak.		
Unusual or Explosive Hazards:		
Vapors heavier than air, may travel, be ignited at remote locations and flash back. Explosive air-vapors mixtures may occur.		

N.D. - Not Determined
 < - Less Than

N.A. - Not Applicable
 > - Greater Than



ENVIRONMENTAL PROTECTION		Code No. 75726
<p>Waste Disposal Method: Re-evaluation of the product may be required by the user at the time of disposal, since the product uses, transformations, mixtures and processes may change classification to non-hazardous or hazardous for reasons other than, or in addition to ignitability. (See Remarks for Waste Classification.)</p> <p>Procedures in Case of Breakage or Leakage: (Transportation Spills Call CHEMTREC (800) 424-9300) Eliminate all ignition sources including internal combustion engines and power tools. Ventilate area. Avoid breathing vapor. Use SCBA or supplied-air mask for lg spills or in confined areas. Contain spill. Remove with inert absorbant. Avoid contact with eyes.</p> <p>Remarks: Waste Classification: Product (as presently constituted) has the RCRA characteristic of ignitability and if discarded in its purchased form would have the hazardous waste number D001.</p>		
PRECAUTIONS		
<p>DANGER EXTREMELY FLAMMABLE CAUSES IRRITATION TO EYES MAY CAUSE IRRITATION TO SKIN</p> <p>Keep away from heat, sparks and flame. Keep container closed. Avoid contact with eyes and prolonged contact with skin. Use only in well-ventilated locations. Avoid prolonged breathing of vapor or mist. Keep head away from container when opening or dispensing. Wash thoroughly after handling.</p>		
<p>Requirements for Transportation, Handling and Storage: Transport, handle, and store in accordance with OSHA Regulation 1910.106 and applicable DOT Regulations.</p> <p>DOT Proper Shipping Name: See Additional Comments Pg. 6 DOT Hazard Class (if applicable): Flammable liquid, UN 1206</p>		
CHEMICAL AND PHYSICAL PROPERTIES		
Boiling Point (°F) <u>185-203</u>	Vapor Pressure <u>53020 C</u>	(mmHg)
Specific Gravity <u>0.70 = 5.8 lb/gal</u> (H ₂ O=1)	Vapor Density <u>2.3</u>	(Air=1)
Appearance and Odor <u>Colorless liquid; mild odor</u>		
pH of undiluted product <u>N.A.</u>	Solubility <u>Neg.</u>	
Percent Volatile by Volume <u>100</u>	Evaporation <u>N.D.</u> ()=1	
Viscosity <u>N.D.</u>	Other <u>-</u>	
Hazardous Polymerizations <u>Occur</u> <input checked="" type="checkbox"/> Do not occur <input type="checkbox"/>		
The Material Reacts Violently With (if others is checked below, see additional comments on page 6 for further details)		
Air	Water	Heat
		Strong Oxidizers
		Others
		None of These
		<input checked="" type="checkbox"/>

N.D. - Not Determined
< - Less Than

N.A. - Not Applicable
> - Greater Than



COMPOSITION Date No. 75726

Chemical/Common Name	CAS No.	Exposure Limit	Range in %
*Hexane	110543	50ppm TWA ACGIH 50ppm TWA-OSHA	1.00 - 3.99
*Benzene	71432	10ppm TWA ACGIH 1 ppm TWA OSHA 5 ppm STEL OSHA	0.01 - 0.09
Contains 37% Raffinate (petroleum) catalytic reformer ethylene glycol-water countercurrent extracts CAS# 68410719 and 63% Distillate (petroleum), light distillate hydrotreating process, low boiling CAS# 68410879.	MIXTURE	None Established	95.00 - 99.99

*Hazardous according to OSHA (1910.1200) or one or more state Right-To-Know lists.

SARA TITLE III

I. Title III Section 302/304 Extremely Hazardous Substance

Component	CAS No.	%	RQ (Lbs)	TPQ (Lbs)
NONE				

II. CERCLA Section 102(a) Hazardous Substances

Component	CAS No.	%	RQ (Lbs)
Benzene	71432	0.01-0.09	1000
Toluene	108883	1.00-3.99	1000 ?
Cyclohexane	110827	4.00-10.99	1000

III. Title III Section 311 Hazard Categorization

Acute	Chronic	Fire	Pressure	Reactive	Not Applicable
X		X			

IV. Title III Section 313 Toxic Chemicals

Component	CAS No.	%
Cyclohexane	110827	4.00-10.99
Toluene	108883	4.00-10.99 ?

**PRODUCT SHIPPING LABEL**

Case No. 75726

78726 TEXSOLVE C

**DANGER: EXTREMELY FLAMMABLE
CAUSES IRRITATION TO EYES
MAY CAUSE IRRITATION TO SKIN**

Keep away from heat, sparks and flame. Keep container closed. Avoid contact with eyes and prolonged contact with skin. Use only in well-ventilated locations. Avoid prolonged breathing of vapor or mist. Keep head away from container when opening or dispensing. Wash thoroughly after handling.

Respiratory irritation, headache and drowsiness may result from exposure to vapors or mist. In poorly ventilated confined spaces, unconsciousness and asphyxiation may result. If these effects occur, remove to fresh air, and if necessary, administer artificial respiration, preferably mouth-to-mouth. Call a doctor. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Wash skin with soap and plenty of water. If swallowed, Do Not induce vomiting. Call a doctor immediately. In case of fire use water spray, foam, dry chemical or CO2.

Chemical/Common Name	CAS No.	Range in %
•Hexane	110543	1.00 - 3.99
•Benzene	71432	0.01 - 0.09
Contains 37% Raffinate (petroleum) catalytic reformer ethylene glycol-water countercurrent extracts CAS# 68410719 and 63% Distillate (petroleum), light distillate hydrotreating process, low boiling CAS# 68410979.	MIXTURE	99.00 - 99.99

•Hazardous according to OSHA (1910.1200) or one or more state Right-To-Know lists.

HMIS
Health : 1 Reactivity : 0
Flammability: 3 Special : -

DOT Proper Shipping Name: See Additional Comments Pg. 6
DOT Hazardous Class : Flammable liquid, UN 1208

CAUTION: Misuse of empty containers can be hazardous. Empty containers can be hazardous if used to store toxic, flammable, or reactive materials. Cutting or welding of empty containers might cause fire, explosion or toxic fumes from residues. Do not pressurize or expose to open flame or heat. Keep container closed and drum bungs in place.

HEALTH EMERGENCY TELEPHONE: (814) 831-3400

**Texaco
2000 Westchester Avenue
White Plains, New York 10680**

**For Additional Technical Information Concerning:
Fuels (814) 836-7336
Lubricants/Antifreezes (814) 838-7609
Chemicals (812) 469-8549**

**Transportation Spills:
CHEMTREC (800) 424-9300**


ADDITIONAL COMMENTS

 Code
No.

75726

STATE OF MICHIGAN CRITICAL MATERIALS ACT (REVISED 1989)
No critical materials present.

Petroleum hydrocarbon solvents containing low molecular weight branched aliphatic hydrocarbons have been associated with kidney damage in male rats upon repeated exposure. The significance of these findings in humans has not been established as similar effects are not generally observed in female rats or mice of either sex.

Product contains n-hexane which can cause damage to the peripheral nervous system of humans. Symptoms include numbness and muscle weakness in the hands, fingers and toes.

Product contains toluene which upon prolonged exposures to high concentrations produces loss of appetite, nose bleeds, and liver, kidney and neural dysfunction.

DOT Proper Shipping Name: Heptane, (contains toluene & cyclohexane).

To determine applicability or effect of any law or regulation with respect to the product, users should consult his legal advisor or the appropriate government agency. Texaco does not undertake to furnish advice on such matters.

By F. E. Bentley Title Senior Coord. of Product Safety
Date 05-21-90 New Revised, Supersedes 05-17-90

N.D. - Not Determined N.A. - Not Applicable
< - Less Than > - Greater Than

ATTACHMENT B

VOC EMISSIONS

**METAL CONTAINER CORPORATION
GAINESVILLE LID PLANT
MODERNIZATION PROJECT**

VOC Emissions Basis

estimates based on shell press capacity
(assumes all shells produced are lined)

press operating efficiency 90 %
annual operation 360 days
usage rates 1989 actual

Shell Press Specifications

<u>machine</u>	<u>speed</u>	<u>stations</u>	<u>shells/min</u>	<u>annual production</u>
1	275	27	7425	3.464 billion
2	275	27	7425	3.464 billion
3	275	24	6600	3.079 billion
4	140	22	3080	1.437 billion
			total	11.445 billion

Coating/Solvent Specifications

<u>compound</u>	<u>typical mfg ident</u>	<u>density [lb/gal]</u>	<u>VOC content [wt frax]</u>	<u>usage rate [gal/1000lids]</u>
end sealant	DM 2140	7.82	0.405	0.0174
tab lube	J-G 3810	6.35	0.945	0.0049
solvents	Texsolve C	5.84	1.000	0.0023 a)
	Amsco 1241	6.32	1.000	0.00019

VOC Emissions (by shell press production)

	<u>pounds/hr</u>	<u>tons/yr</u>
Machine 1 (Module 7)		
end sealant	24.5	95.4
tab lube	13.1	50.9
Texsolve C	6.0	23.3
Amsco 1241	0.5	2.1
total	44.2	171.7

	pounds/hr	tons/yr
Machine 2 (Module 6)		
end sealant	24.5	95.4
tab lube	13.1	50.9
Texsolve C	6.0	23.3
Amsco 1241	0.5	2.1
total	44.2	171.7
Machine 3 (Module 5)		
end sealant	21.8	84.8
tab lube	11.6	45.3
Texsolve C	5.3	20.7
Amsco 1241	0.5	1.8
total	39.3	152.6
Machine 4 (Module 4)		
end sealant	10.2	39.6
tab lube	5.4	21.1
Texsolve C	2.5	9.7
Amsco 1241	0.2	0.9
total	18.3	71.2
Entire Facility		
end sealant	81.1	315.2
tab lube	43.3	168.3
Texsolve C	19.8	76.9
Amsco 1241	1.8	6.9
total	145.9	567.2

a) Represents 77.7% of total usage; 22.3% is recovered for recycle.

ATTACHMENT C

**REVISED ATTACHMENT VIII -
POTENTIAL TOXIC EMISSIONS ESTIMATES
AND IMPACT ASSESSMENT**

ATTACHMENT VIII

POTENTIAL TOXIC EMISSIONS ESTIMATES

AND IMPACT ASSESSMENT

(REVISED 12/5/90)

Table VIII-1

**METAL CONTAINER CORPORATION - GAINESVILLE LID PLANT
MODERNIZATION PROJECT**

POTENTIAL TOXIC EMISSIONS

Basis of Estimates

production	24530 lids/min;	11.445 billion lids/yr		
	<u>density</u> [lb/gal]	<u>usage rate</u> [gal/1000 lids]	<u>chemical</u>	<u>weight</u> <u>percent</u>
end sealant	7.82	0.0174	n-hexane	13
			n-heptane	3
			cyclohexane	2
			cyclohexylmethane	1
			benzene	0.001
Texsolve C	5.84	0.0023	n-hexane	4
			n-heptane	90
			cyclohexane	4
			toluene	4
			benzene	0.01
Amsco 1241	6.32	0.0002	stoddard solvent	100

Emissions

	pounds/hr	tons/yr
n-hexane	26.8	104.2
n-heptane	23.8	92.5
cyclohexane	4.8	18.6
cyclohexylmethane	2.0	7.8
toluene	0.8	3.1
benzene	0.004	0.02
stoddard solvent	1.8	6.9

TOXIC EMISSIONS ESTIMATE

Estimates of emissions of potential air toxics from the use of low solvent compounds at the Gainesville facility are shown in Table VIII-1. The estimates are based on maximum hourly and annual average production rates, 1989 usage rates at the facility, and compound composition information provided by the manufacturer. These emissions reflect the change from hexane-based clean-up solvent to a heptane-based solvent (Texsolve C).

IMPACT ASSESSMENT

The maximum hourly emissions of potential air toxics were modeled to determine the off-property ambient impacts for comparison to the no-threat levels established by the Florida Air Toxics Working Group. These no-threat levels include an ample margin of safety to ensure that public health effects are unlikely to occur at such levels. The attached report details the modeling analysis methodology and results.

Table VIII-2 summarizes the maximum predicted off-property impacts of each pollutant compared to the no-threat levels. All predicted impacts are well below the applicable no-threat levels.

TABLE VIII-2

MAXIMUM PREDICTED OFF-PROPERTY IMPACTS
 COMPARED TO THE FATWG* NO-THREAT LEVELS

POLLUTANT	MAXIMUM IMPACT (ug/m ³)			NO-THREAT LEVELS (ug/m ³)		
	8 HOUR	24-HOUR	ANNUAL	8-HOUR	24-HOUR	ANNUAL
n-hexane	796	355	--	1,800	430	--
n-heptane	707	315	--	32,000	15,238	--
cyclohexane	143	64	--	1,000	238	--
cyclohexylmethane	59	27	--	32,000	7,619	--
toluene	--	--	11**	--	--	2,000
benzene	--	--	0.05**	--	--	0.12
stoddard solvent	53	24	--	5,250	1,250	--

*Florida Air Toxic Working Group

**Annual impacts were not modeled. Annual impacts were conservatively assumed to equal the modeled 24-hour maximum impact.

ATTACHMENT D

PARTS CLEANERS AND TANKS DATA

PARTS CLEANERS

- 1 - Safety Kleen Model 44 (40 gallon capacity)
- 1 - Heptane Solvent Unit (6 gallon capacity)

SOLVENT

Safety-Kleen Unit - Stoddard Solvent

Heptane Unit - Teksolve C

EMISSION ESTIMATES

Safety-Kleen Unit

service interval - 8 weeks

43 gal/yr lost (Safety-Kleen Loss Calculation)

43 gal/yr x 6.3 lb/gal = 271 lb stoddard solvent/yr

Heptane Unit

service interval - 4 weeks

Assume 20% lost (MCC records)

0.2 x 6 gal/mo x 12 mo/yr x 5.8 lb/gal = 84 lb

Teksolve C/yr

END SEALANT COMPOUND STORAGE TANKS

- 1 - 7,000 gallon bulk storage tank
- 1 - 500 gallon day tank

THROUGHPUT OF COMPOUND (DM 2140M)

$$0.0174 \text{ gal/1000 lids} \times 11,445,000,000 \text{ lids/yr}$$

$$= 199,143 \text{ gal/yr}$$

$$= 28 \text{ turnovers of bulk tank}$$

$$= 398 \text{ turnovers of day tank}$$

EMISSIONS ESTIMATES

Breathing Losses

None - indoor tanks

Working Losses

$$Lw = 0.000024 Mv P V N Kn Kc$$

where

Lw = loss (lb/yr)

Mv = molecular weight of vapor = 89

P = vapor pressure (psia) = 4.1

V = capacity (gal)

N = turnovers/yr

Kn = turnover factor (1.0, bulk; 0.25, day)

Kc = product factor (1.0)

$$Lw (7,000 \text{ gal}) = 1742 \text{ lb/yr}$$

$$Lw (500 \text{ gal}) = 436 \text{ lb/yr}$$



ANHEUSER-BUSCH COMPANIES

October 5, 1990

RECEIVED

OCT 11 1990

DER-BAQM

Mr. C. H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Regulation
Irwin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**RE: Permit No. AC 01-185835 & PSD-FL-153
Metal Container Corporation - Gainesville Lid Plant**

Dear Mr. Fancy:

This letter presents the additional information on the referenced application that was requested in your September 28, 1990 letter to Mr. Robert M. Lanham. This information is presented as responses to the questions in your letter.

Question 1: How many modules will exist after the plant modification? List equipment per each module after modification. Specify proposed emissions per each module.

Response: Four modules will exist after the modernization. The application presented these modules based on their associated shell presses. However, for clarity and consistency, these will be designated as modules. The equipment associated with these modules is shown in Table 1. Emissions per each module are as presented in the original application (see attached spreadsheet). As stated in the application all shells produced are assumed to be converted and lined. Therefore, emissions from lining of lids converted by the off-line conversion presses (CP-11 and CP-12), as well emissions from tab lube, are distributed among the four modules (or machines, as presented in the application).

Question 2: Is there only one unit (exhaust vent) being added as a result of this modification? Please explain.

Mr. C. H. Fancy, P.E.
October 5, 1990
Page 2

Response: A number of "exhaust" vents are being added - both scrap cyclone exhausts and building ventilation exhausts. The final vent configuration will be as it is presented in the application.

Question 3: What steps have been taken to minimize hexane emissions at your facility? What additional steps could be taken to lower maximum predicted hexane concentrations to be below the 24-hr no-threat level of 430 ug/m³?

Response: As is presented in the application, very significant design modifications will be made at the facility to minimize hexane emissions. Four building exhaust vents will be modified to vertical discharges with stacks that discharge 15 feet above the roof level. These vents will be operated continuously. The vents currently operate only during the summer months and discharge downward, several feet above roof level. Five other vents, of which three currently discharge horizontally at roof level, will be constructed/modified to discharge vertically through stacks ten feet above the roof. The scrap cyclones must have rain caps on their exhaust vents in order to operate properly. However, their discharges will be raised ten feet above the roof to reduce their contribution to the hexane impacts.

Metal Container Corporation is current evaluating other measures to reduce the ambient hexane impacts. These include the technical feasibility of modifying the scrap cyclones to allow vertical exhausts.

Please don't hesitate to call me at (314) 477-4162 with any additional questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



D. E. Pusch

DEP/tms

cc: T. Heron - FDNR
C. Holladay - FDNR

A. Rutynow, NE Dist
J. Harper, EPA
C. Shaul, NPS

S. Baruch, DER, Dainesville 11-7-90

Table 1. METAL CONTAINER CORPORATION – GAINESVILLE LID CENTER
MODERNIZATION PROJECT

EQUIPMENT IDENTIFICATION BY MODULE

<u>Module</u>	Permit Application <u>Designation (a)</u>	Shell <u>Press</u>	<u>Equipment (b)</u>	
			<u>End Liners</u>	<u>Conversion Presses</u>
4 (c)	Machine 4 (c)	SP-4	EL-4 EL-5	CP-6 CP-7
5 (d)	Machine 3 (d)	SP-3	EL-1 EL-2 EL-3 EL-6	CP-8 CP-9 CP-10
6	Machine 2	SP-2	EL-11 EL-12 EL-13 EL-14	CP-4 CP-5
7	Machine 1	SP-1	EL-7 EL-8 EL-9 EL-10	CP-1 CP-2 CP-3
Off-Line Conversion Presses	-	-	-	CP-11 CP-12

(a) As designated in the August 15, 1990 permit application

(b) As identified in Table II.A-1 of the August 15, 1990
permit application

(c) Currently identified/permited as Module 4 by Florida
DNR

(d) Currently identified/permited as Module 6 by Florida
DNR

TABLE II.A-1
GAINESVILLE LID CENTER MODERNIZATION -
EQUIPMENT LIST

<u>IDENTIFICATION</u>	<u>MANUFACTURER</u>	<u>COMMENTS</u>
SHELL PRESS		
SP-1	Minster/Redicor* End Level II	New
SP-2	"	"
SP-3	"	Existing ^{a)}
SP-4	Minster/Redicon DAS-100-72	" ^{b)}
CONVERSION PRESS		
CP- 1	Minster/Stolle	New
CP- 2	"	"
CP- 3	"	"
CP- 4	"	"
CP- 5	"	"
CP- 6	Bruderer/Stolle	Existing ^{b)}
CP- 7	"	" ^{b)}
CP- 8	Minster/Stolle	" ^{a)}
CP- 9	"	" ^{a)}
CP-10	"	" ^{a)}
CP-11	"	New
CP-12	"	"
END LINER		
EL-1	Preferred	Existing ^{a)}
EL-2	"	" ^{a)}
EL-3	"	" ^{a)}
EL-4	"	" ^{b)}
EL-5	"	" ^{b)}
EL-6	"	"
EL-7	"	"
EL-8	"	"
EL-9	"	"
EL-10	"	"
EL-11	"	"
EL-12	"	New
EL-13	"	"
EL-14	"	"

- a) Currently identified/permitted as Module 6 by Florida DER.
- b) Currently identified/permitted as Module 4 by Florida DER.

METAL CONTAINER CORPORATION
 GAINESVILLE LID PLANT
 MODERNIZATION PROJECT

VOC Emissions Basis

estimates based on shell press capacity
 (assumes all shells produced are lined)

press operating efficiency 90 %
 annual operation 360 days
 usage rates 1989 actual

Shell Press Specifications

<u>machine</u>	<u>speed</u>	<u>stations</u>	<u>shells/min</u>	<u>annual production</u>
1	275	27	7425	3.464 billion
2	275	27	7425	3.464 billion
3	275	24	6600	3.079 billion
4	140	22	3080	1.437 billion
			total	11.445 billion

Coating/Solvent Specifications

<u>compound</u>	<u>typical mfq ident</u>	<u>density [lb/gal]</u>	<u>VOC content [wt frax]</u>	<u>usage rate [gal/1000lids]</u>
end sealant	DM 2140	7.82	0.405	0.0174
tab lube	J-G 3810	6.35	0.945	0.0049
solvents	Amsco 1487	5.58	1.000	0.0023 a)
	Amsco 1241	6.32	1.000	0.00019

VOC Emissions (by shell press production)

	<u>pounds/hr</u>	<u>tons/yr</u>
Machine 1 (Module 7)		
end sealant	24.5	95.4
tab lube	13.1	50.9
Amsco 1487	5.7	22.2
Amsco 1241	0.5	2.1
total	43.9	170.6

	pounds/hr	tons/yr
Machine 2 (Module 6)		
end sealant	24.5	95.4
tab lube	13.1	50.9
Amsco 1487	5.7	22.2
Amsco 1241	0.5	2.1
total	43.9	170.6
Machine 3 (Module 5)		
end sealant	21.8	84.8
tab lube	11.6	45.3
Amsco 1487	5.1	19.8
Amsco 1241	0.5	1.8
total	39.0	151.7
Machine 4 (Module 4)		
end sealant	10.2	39.6
tab lube	5.4	21.1
Amsco 1487	2.4	9.2
Amsco 1241	0.2	0.9
total	18.2	70.8
Entire Facility		
end sealant	81.1	315.2
tab lube	43.3	168.3
Amsco 1487	18.9	73.4
Amsco 1241	1.8	6.9
total	145.0	563.8

a) Represents 77.7% of total usage; 22.3% is recovered for recycle.



ANHEUSER-BUSCH COMPANIES

April 23, 1991

Mr. Barry Andrews, P.E. - Administrator
Permitting and Standards Section
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: **Metal Container Corporation**
Gainesville Lid Plant Modernization Project
DER File No. AC 01-185835, PSD-FL-153

Dear Mr. Andrews:

This letter and the supplemental data submitted April 25, 1991, present Metal Container Corporation's comments on the Technical Evaluation and Preliminary Determination and proposed permit to modify the Gainesville Lid Plant.

Incorporation of Supplemental Data

Metal Container Corporation requests that the Department include in any technical evaluation the data submitted on December 10, 1990 regarding the reduction in hexane emissions as well as the supplemental information submitted on April 25, 1991. The information presented in these submittals will change emission summaries and proposed permit limits.

Specific Condition 1 - VOC Content

The VOC content of the heptane based cleanup solvents is 5.84 lb/gal. The plant has changed to this solvent from the previously used hexane based solvent to reduce hexane emissions from facility operations.

Specific Condition 7 - Thermal Oxidizer

Thermal oxidation of fugitive emissions from high-speed lid lines is an unproven technology. Metal Container Corporation's April 25, 1991 submittal presents technical data that demonstrates that the thermal oxidation system on which this permit condition is based is not a technically

feasible control

alternative. The technical problems and excessive costs associated with thermal oxidation of fugitive emissions at this type of plant are presented in the April 25, 1991 submittal. This submittal demonstrates that best available control technology is the use of low solvent, high solids end sealant compound.

Specific Condition 11 - Waste Solvent Analysis

In the original permit application, MCC estimated that 23 percent of TexSolve C (heptane) will be shipped offsite as waste for recycling. These wastes contain a mixture of oils as well as solvents. To obtain an accurate determination of the VOC content of waste cleanup solvent taken offsite, MCC proposes analysis of the wastes for heptane. A composite sample of the wastes will be taken every six months and analyzed for heptane to determine the quantity sent offsite.

BACT Determination - Environmental Impact Analysis

The air toxics emissions data overstated the air toxics emissions from end sealant usage on the two new modules. The correct emissions are shown below.

<u>Air Toxic</u>	<u>Emissions (tons/year)</u>
n-hexane	38.1
n-heptane	8.8
cyclonexane	5.9
cyclohexylmethane	<u>2.9</u>
Total	55.7

The maximum 24-hour impact of n-hexane (287 ug/m³) due to emissions from the entire facility is well below the Florida Air Toxic Working Group's No-Threat Level (430 ug/m³). Thus, these emissions do not pose a threat to public health or welfare.

BACT Determination - Discussion

This section states that the facility would be ranked as the sixth highest VOC emitter in Florida after the modernization. This determination is not valid, since MCC's potential emissions were compared to the other facilities' actual emissions.

General Comment

MCC requests that the Department redesignate the lid modules to be consistent with the plant's designation. The April 25, 1991 submittal presents the preferred designation, as shown below.

MCC Designation

Module 4
Module 5
Module 6
Module 7

DER Designation

Module 4^{a)}
Module 6^{a)}
--
--

a) currently permitted

Call me at (314) 577-4162 if you have any questions regarding these comments.

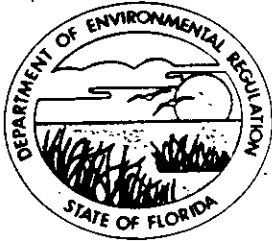
Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Dean E. Pusch
Sr. Environmental Scientist

DEP:cd



File Copy

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 2, 1990

Mrs. Chris Shaver
Chief, Permit Review and Technical
Support Branch
National Park Service
Air Quality Division
P. O. Box 25287
Denver, Colorado 80255

Dear Mrs. Shaver:

Re: Completeness Review

The enclosed information is being forwarded to you for completeness review.

1. CF Industries - "C" and "D" Double Absorption Sulfuric Acid Plants modifications; PSD-FL-155; please submit comments by October 25, 1990; and,
2. Anheuser-Busch Companies, Inc. - lid production capacity modification; PSD-FL-153; currently incomplete and their response will be forwarded upon receipt; please review for comments.

If there are any questions, please call Barry Andrews at (904) 488-1344 or write to me at the above address. All comments, written or oral, should be received by the above requested dates. If it is convenient to FAX a response to us, the FAX number to use is (904)922-6979.

Sincerely,

B C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/t

Ready File



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 2, 1990

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Ms. Harper:

Re: Completeness Review

The enclosed information is being forwarded to you for completeness review.

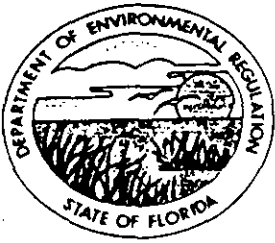
1. Vero Beach Municipal Power Plant: 58 MW combined cycle plant; PSD-FL-152; please submit comments by October 29, 1990;
2. Farmland Industries, Inc. - Green Bay Complex: Sulfuric Acid Plant No. 5 modification; PSD-FL-143A; please submit comments as soon as possible;
3. CF Industries - "C" and "D" Double Absorption Sulfuric Acid Plants modifications; PSD-FL-155; please submit comments by October 25, 1990; and,
4. Anheuser-Busch Companies, Inc. - lid production capacity modification; PSD-FL-153; currently incomplete and their response will be forwarded upon receipt; please review for comments.
5. Ft. Pierce Utilities Authority - H.D. King Unit 9: modification; PSD-FL-154; currently incomplete and their response will be forwarded to you upon receipt; please review for comments.

If there are any questions, please call Barry Andrews at (904) 488-1344 or write to me at the above address. All comments, written or oral, should be received by the above requested dates. If it is convenient to FAX a response to us, the FAX number to use is (904)922-6979.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/t



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

September 28, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert M. Lanham
Anheuser-Busch Companies, Inc.
Executive Office
St. Louis, Missouri 63118-1852

Dear Mr. Lanham:

Re: Permit No. AC 01-185835 & PSD-FL-153

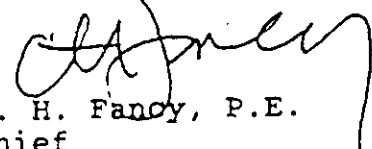
The Department has reviewed your application for a permit to construct/modify the metal container lid facility in Gainesville, Alachua County, Florida. We need more information to process this application. Please complete the applications by supplying the information requested below:

1. How many modules will exist after the plant modification? List equipment per each module after modification. Specify proposed emissions per each module.
2. Is there only one unit (exhaust vent) being added as a result of this modification? Please explain.
3. What steps have been taken to minimize hexane emissions at your facility? What additional steps could be taken to lower maximum predicted hexane concentrations to be below the 24-hr no-threat level of 430 ug/m³?

We will resume processing your application as soon as this information is received.

If you have any questions, please call Teresa Heron, review engineer, at (904)488-1344 or Cleve Holladay, meteorologist, or write to me at the above address.

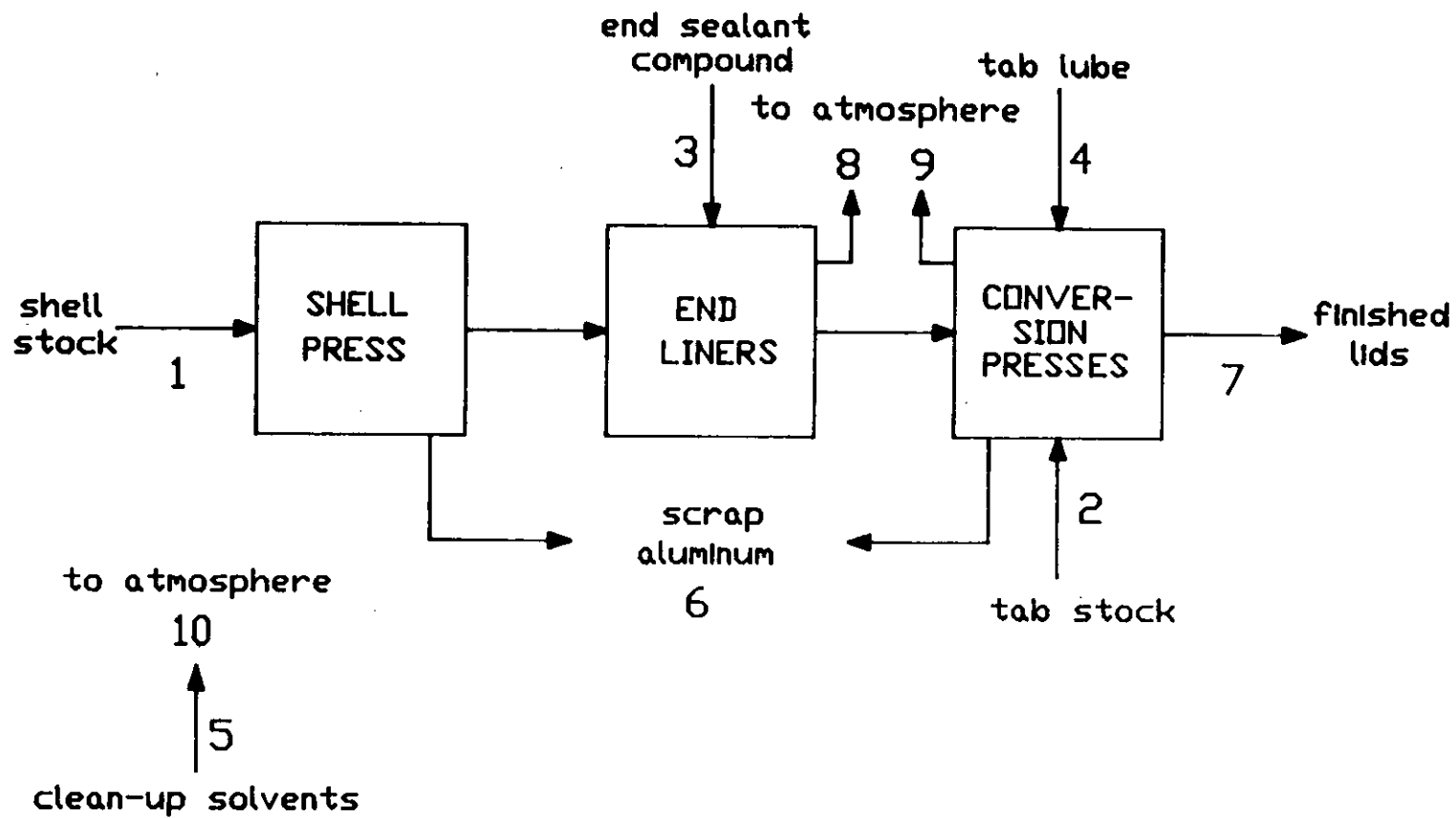
Sincerely,


C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/TH/plm



GAINESVILLE MODERNIZATION - FLOW DIAGRAM

TYPICAL MODULE BASED ON SHELL PRESS - ONE OF FOUR

P 256 396 204

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to Mr. Robert M. Lanham, A B	
Street and No. Executive Office	Company Company
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 and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 9-28-90 Permit: AC 01-185835 PSD-FL-153	