



ANHEUSER-BUSCH COMPANIES

February 10, 1995

RECEIVED

FEB 15 1995

**Mr. Clair Fancy
Bureau of Air Regulation
Florida Department of Environmental Protection
Mail Stop 5500
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400**

**Bureau of
Air Regulation**

**Re: Metal Container Corporation - Gainesville, FL Lid Center
Modification to Air Permit No. AO01-220792**

Dear Mr. Fancy:

Metal Container Corporation requests a modification to the referenced permit for its lid production center located in Gainesville. Enclosed is a permit application package detailing this modification. A check for \$2,000 is enclosed to cover the fee associated with this request for a permit modification.

In order to continue production of the high quality, food-grade product required by its customers, MCC must change the end sealant compound which is applied to the lids. The proposed new compound has a slightly higher volatile organic compound (VOC) content than currently allowed by the referenced permit. However, operational changes, such as reduced application rates, production of smaller diameter lids, the use of pre-lubricated aluminum stock for the tabs, and the use of lower- or no-VOC cleanup materials, result in a decrease in potential VOC emissions at the facility of over 160 tons per year from the currently permitted level.

The switch to the new compound will virtually eliminate emissions of hexane; a reduction of almost 90 tons per year. Hexane is identified by the Department and EPA as a Hazardous Air Pollutant. Thus, this change will result in a considerable environmental benefit by significantly reducing potential emissions of both VOC and a Hazardous Air Pollutant.

Given MCC's immediate need to make this change, and the associated environmental benefits, timely processing of this request would be greatly appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

**Dean E. Pusch
Manager, Regulatory Issues
Environmental Affairs Department**

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

Mail Code: 202-4
Phone: 314/577-4162
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Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form provides general information on the scope of this application, the purpose for which this application is being submitted, and the nature of any construction or modification activities proposed as a part of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department on diskette, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

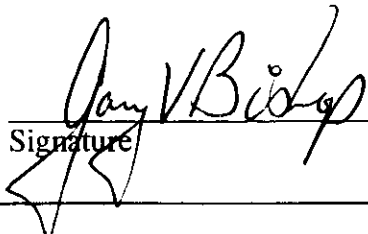
Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility name, if any; and a brief reference to the facility's physical location. If known, also enter the ARMS or AIRS facility identification number. This information is intended to give a quick reference, on the first page of the application form, to the facility addressed in this application. Elsewhere in the form, numbered data fields are provided for entry of the facility data in computer-input format.

<i>Metal Container Corporation Gainesville Lid Plant (ID No. 31GVL010046) Gainesville, Florida</i>
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Application Processing Information (DEP Use)

1. Date of Receipt of Application:	2-15-95
2. Permit Number:	AC01-265409
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: <i>Mr. Gary V. Bishop, Plant Manager</i>			
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <i>Metal Container Corporation</i> Street Address: <i>5909 N.W. 18th Drive</i> City: <i>Gainesville</i> State: <i>Florida</i> Zip Code: <i>32606</i>			
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <i>(904) 378-8800</i> Fax: <i>(904) 372-1281</i>			
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the facility (non-Title V source) addressed in this Application for Air Permit or the responsible official, as defined in Chapter 62-213, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. If the purpose of this application is to obtain an air operation permit or operation permit revision for one or more emissions units which have undergone construction or modification, I certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>			
 Signature		<i>2/14/95</i> Date	

*Attach letter of authorization if not currently on file.

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
- Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be revised: _____

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

- Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): _____

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: AO 01-220792

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

- Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

Attached - Amount: \$ 2,000

Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations: <i>See Section 2.0 in the attached report.</i>
2. Projected or Actual Date of Commencement of Construction (DD-MON-YYYY): <i>03-APR-1995</i>
3. Projected Date of Completion of Construction (DD-MON-YYYY): <i>03-APR-1995</i>

Professional Engineer Certification

1. Professional Engineer Name: <i>Thomas W. Davis, P.E.</i> Registration Number: <i>36777</i>
2. Professional Engineer Mailing Address: Organization/Firm: <i>Environmental Consulting & Technology, Inc.</i> Street Address: <i>3701 N.W. 98th Street</i> City: <i>Gainesville</i> State: <i>Florida</i> Zip Code: <i>32606</i>
3. Professional Engineer Telephone Numbers: Telephone: <i>(904) 332-0444</i> Fax: <i>(904) 332-6722</i>

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance (a) that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; or (b) for any application for a Title V source air operation permit, that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application;

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application; and

(3) For any application for an air construction permit for one or more proposed new or modified emissions units, the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

Thomas W. Davis

Signature

2/12/95

Date

(seal)

*Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact:

*Robert M. Lanham, P.E.
Manager, Environmental Engineering*

2. Application Contact Mailing Address:

Organization/Firm: *Metal Container Corporation*
Street Address: *3636 South Geyer Road, Suite 400*
City: *St. Louis* State: *Missouri* Zip Code: *63127-1218*

3. Application Contact Telephone Numbers:

Telephone: *(314) 957-0769* Fax: *(314) 957-0719*

Application Comment

See attached report.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Name, Location, and Type

1. Facility Owner or Operator: <i>Metal Container Corporation</i>			
2. Facility Name: <i>Gainesville Lid Plant</i>			
3. Facility Identification Number: <i>31GVL010046</i>		[] Unknown	
4. Facility Location Information: Facility Street Address: <i>5909 N.W. 18th Drive</i> City: <i>Gainesville</i> County: <i>Alachua</i> Zip Code: <i>32606</i>			
5. Facility UTM Coordinates: Zone: <i>17</i> East (km): <i>369.4</i> North (km): <i>3,287.2</i>			
6. Facility Latitude/Longitude: Latitude (DD/MM/SS): <i>N/A</i> Longitude (DD/MM/SS): <i>N/A</i>			
7. Governmental Facility Code: <i>0</i>	8. Facility Status Code: <i>A</i>	9. Relocatable Facility? [] Yes [<i>X</i>] No	10. Facility Major Group SIC Code: <i>34</i>
11. Facility Comment:			

Facility Contact

1. Name and Title of Facility Contact: <i>Mr. Robert Smallwood, Environmental Coordinator</i>	
2. Facility Contact Mailing Address: Organization/Firm: <i>Metal Container Corporation</i> Street Address: <i>5909 N.W. 18th Drive</i> City: <i>Gainesville</i> State: <i>Florida</i> Zip Code: <i>32606</i>	
3. Facility Contact Telephone Numbers: Telephone: <i>(904) 491-8819</i> Fax: <i>(904) 372-1281</i>	

Facility Regulatory Classifications

1. Small Business Stationary Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown
2. Title V Source? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Synthetic Non-Title V Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Synthetic Minor Source of Pollutants Other than HAPs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6. Major Source of Hazardous Air Pollutants (HAPs)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Possible
7. Synthetic Minor Source of HAPs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8. One or More Emissions Units Subject to NSPS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9. One or More Emission Units Subject to NESHAP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. Title V Source by EPA Designation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11. Facility Regulatory Classifications Comment: <p><i>The facility is a synthetic minor source of HAPs because of its use of compounds and solvents containing minimal amounts of HAPs (e.g., hexane). The facility's operating permit requires that "new coatings or solvents. . . 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. . ."</i></p>

B. FACILITY REGULATIONS

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of federal, state, and local regulations applicable to the facility as a whole. (Regulations applicable to individual emissions units within the facility are addressed in Subsection III-B of the form.)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

C. FACILITY POLLUTANT INFORMATION

This subsection of the Application for Air Permit form allows for the reporting of potential and estimated emissions of selected pollutants on a facility-wide basis. It must be completed for each pollutant for which the applicant proposes to establish a facility-wide emissions cap and for each pollutant for which emissions are not reported at the emissions-unit level.

Facility Pollutant Information: Pollutant 1 of 3

1. Pollutant Emitted:	<i>H017 (Benzene)</i>	
2. Estimated Emissions:	<i>0.002</i>	(tons/year)
3. Requested Emissions Cap:	<i>N/A</i>	(lb/hour) (tons/year)
4. Basis for Emissions Cap Code:	<i>N/A</i>	
5. Facility Pollutant Comment:		

Facility Pollutant Information: Pollutant 2 of 3

1. Pollutant Emitted:	<i>H104 (Hexane)</i>	
2. Estimated Emissions:	<i>0.41</i>	(tons/year)
3. Requested Emissions Cap:	<i>N/A</i>	(lb/hour) (tons/year)
4. Basis for Emissions Cap Code:	<i>N/A</i>	
5. Facility Pollutant Comment:		

Facility Pollutant Information: Pollutant 3 of 3

1. Pollutant Emitted:	<i>H169 (Toluene)</i>		
2. Estimated Emissions:			(tons/year)
	<i>0.41</i>		
3. Requested Emissions Cap:		(lb/hour)	(tons/year)
	<i>N/A</i>		
4. Basis for Emissions Cap Code:	<i>N/A</i>		
5. Facility Pollutant Comment:			

Facility Pollutant Information: Pollutant of

1. Pollutant Emitted:			
2. Estimated Emissions:			(tons/year)
3. Requested Emissions Cap:	(lb/hour)		(tons/year)
4. Basis for Emissions Cap Code:			
5. Facility Pollutant Comment:			

D. FACILITY SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the facility as a whole. (Supplemental information related to individual emissions units within the facility is provided in Subsection III-I of the form.) Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>Fig. 1-1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: ___ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested <i>Submitted previously</i>
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID: <u>Fig. 2-1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: ___ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: ___ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input checked="" type="checkbox"/> Attached, Document ID: <u>Report</u> <input type="checkbox"/> Not Applicable

Additional Supplemental Requirements for Category I Applications Only

7. List of Insignificant Activities: <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Equipment/Activities Onsite but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
11. Enhanced Monitoring Plan: <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
12. Risk Management Plan Verification: <input type="checkbox"/> Plan Submitted to Implementing Agency - Verification Attached, Document ID:____ <input type="checkbox"/> Plan to be Submitted to Implementing Agency by Required Date <input type="checkbox"/> Not Applicable
13. Compliance Report and Plan <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
14. Compliance Statement (Hard-copy Required) <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

This subsection of the Application for Air Permit form provides general information on the emissions unit addressed in this Emissions Unit Information Section, including information on the type, control equipment, operating capacity, and operating schedule of the emissions unit.

Type of Emissions Unit Addressed in This Section

Check one:

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, an individually-regulated emission point (stack or vent) serving a single process or production unit, or activity, which also has other individually-regulated emission points.
- This Emissions Unit Information Section addresses, as a single emissions unit, a collectively-regulated group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

Emissions Unit Control Equipment

A.

1. Description: <i>None</i>
2. Control Device or Method Code: <i>N/A</i>

B.

1. Description: <i>None</i>
2. Control Device or Method Code: <i>N/A</i>

C.

1. Description: <i>None</i>
2. Control Device or Method Code: <i>N/A</i>

Emissions Unit Information Section 1 of 1

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate: mmBtu/hr N/A
2. Maximum Incineration Rate: lb/hr tons/day N/A
3. Maximum Process or Throughput Rate: N/A
4. Maximum Production Rate: N/A
5. Operating Capacity Comment: <i>MCC proposes to eliminate limitations on the facility's throughput and production, since the facility (the emissions unit) already has an emission limit, which is not entirely and directly proportional to throughput or production. See Sections 1.0 and 4.0 of the attached report for further discussion on this point.</i>

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:			
24	hours/day	7	days/week
52	weeks/year	8,760	hours/year

B. EMISSIONS UNIT REGULATIONS

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of all federal, state, and local regulations applicable to the emissions unit addressed in this Emissions Unit Information Section.

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

<i>N/A</i>

Emissions Unit Information Section 1 of 1

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

<i>62-4.030, F.A.C.</i>	<i>62-103.150, F.A.C.</i>
<i>62-4.050(1), (2), (3), and (4)(a)(1), F.A.C.</i>	<i>62-210, F.A.C.</i>
<i>62-4.055, F.A.C.</i>	<i>62-212.300, F.A.C.</i>
<i>62-4.080, F.A.C.</i>	<i>62-400(5)(c), F.A.C.</i>
<i>62-4.130, F.A.C.</i>	<i>62-213, F.A.C.</i>
<i>62-4.160, F.A.C.</i>	<i>62-296.320, F.A.C.</i>
<i>62-4.210, F.A.C.</i>	<i>62-296.330, F.A.C.</i>

C. EMISSION POINT (STACK/VENT) INFORMATION

This subsection of the Application for Air Permit form provides information about the emission point associated with the emissions unit addressed in this Emissions Unit Information Section. An emission point is typically a stack or vent but can be any identifiable location at which air pollutants, including fugitive emissions, are discharged into the atmosphere.

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:	
2. Emission Point Type Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit: N/A	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A	
5. Discharge Type Code: <input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W	
6. Stack Height:	36 feet
7. Exit Diameter:	3.5 feet
8. Exit Temperature:	80 °F
9. Actual Volumetric Flow Rate:	14,400 acfm

Emissions Unit Information Section 1 of 1

10. Percent Water Vapor :			%
<i>N/A</i>			
11. Maximum Dry Standard Flow Rate:			dscfm
<i>N/A</i>			
12. Nonstack Emission Point Height:			feet
<i>N/A</i>			
13. Emission Point UTM Coordinates:	<i>N/A</i>		
Zone:	East (km):	North (km):	
14. Emission Point Comment:			
<i>The emission point parameters provided in Fields 5-9 are representative of multiple stacks and vents.</i>			

Emissions Unit Information Section 1 of 1

D. SEGMENT (PROCESS/FUEL) INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of segment data (Fields 1-10) must be completed for each segment required to be reported and for each alternative operating method or mode (emissions trading scenario) under Chapter 62-213, F.A.C., for which the maximum hourly or annual segment-related rate would vary. A segment is a material handling, process, fuel burning, volatile organic liquid storage, production, or other such operation to which emissions of the unit are directly related. See instructions for further details on this subsection of the Application for Air Permit.

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): <i>Application of end liner and tab lubricant compounds, and usage of miscellaneous solvents.</i>	
2. Source Classification Code (SCC): <i>40201726, 40201799, 40201705</i>	
3. SCC Units: <i>Tons solvent in compound(s).</i>	
4. Maximum Hourly Rate: <i>78.0</i>	5. Maximum Annual Rate: <i>319.1</i>
6. Estimated Annual Activity Factor: <i>N/A</i>	
7. Maximum Percent Sulfur: <i>N/A</i>	8. Maximum Percent Ash: <i>N/A</i>
9. Million Btu per SCC Unit: <i>N/A</i>	
10. Segment Comment: <i>SCC 40201726 corresponds with "End Sealing Compound." SCC 40201799 corresponds with "Other Not Classified" and is used here for the process of applying tab lube. SCC 40201705 corresponds to "Equipment Cleanup" (i.e., the use of cleanup solvents). Maximum hourly and annual rates (Fields 4 and 5) are equal to the total tons of VOC contained in all compounds and solvents and are equal to the VOC emission rates.</i>	

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 1 of 1

1. Pollutant Emitted: VOC		
2. Total Percent Efficiency of Control:	%	
0		
3. Primary Control Device Code: N/A		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	78.0 lb/hour	319.1 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions:	N/A	
<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3	_____ to _____ tons/year	
8. Emission Factor: Material balance Reference: See Section 2.0 of attached report.		
9. Emissions Method Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: See Section 2.0 of attached report.		
11. Pollutant Potential/Estimated Emissions Comment: <i>VOC emissions are synthetically limited by the use of compounds and solvents containing specified or limited amounts of VOCs. The facility's operating permit requires that "new coatings or solvents. . . 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. . ."</i>		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: <i>Rule</i>
2. Future Effective Date of Allowable Emissions: <i>03-APR-1995</i>
3. Requested Allowable Emissions and Units: <i>Other: 0.019 gal/1,000 lids (all coatings and solvents)</i>
4. Equivalent Allowable Emissions: <i>78.0 lb/hour</i> <i>319.1 tons/year</i>
5. Method of Compliance: <i>Maintaining records of quantities of all compounds and solvents used.</i>
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): <i>62-212.400(5)(c), F.A.C., Best Available Control Technology</i>

B.

1. Basis for Allowable Emissions Code: <i>Rule</i>
2. Future Effective Date of Allowable Emissions: <i>03-APR-1995</i>
3. Requested Allowable Emissions and Units: <i>Other: 3.5 lb VOC/gal end sealant (less water)</i>
4. Equivalent Allowable Emissions: <i>70.0 lb/hr</i> <i>251.0 tons/year</i>
5. Method of Compliance: <i>Maintaining records of end sealant specifications and usage.</i>
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): <i>62-212.400(5)(c), F.A.C., Best Available Control Technology</i>

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

C.

1. Basis for Allowable Emissions Code: <i>Rule</i>
2. Future Effective Date of Allowable Emissions: <i>03-APR-1995</i>
3. Requested Allowable Emissions and Units: <i>Other: 6.0 lb VOC/gal tab lube (less water)</i>
4. Equivalent Allowable Emissions: <i>11.0 lb/hr</i> <i>45.2 tons/year</i>
5. Method of Compliance: <i>Maintaining records of tab lube specifications and usage.</i>
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): <i>62-212.400(5)(c), F.A.C., Best Available Control Technology</i>

D.

1. Basis for Allowable Emissions Code: <i>Rule</i>
2. Future Effective Date of Allowable Emissions: <i>03-APR-1995</i>
3. Requested Allowable Emissions and Units: <i>Other: 6.32 lb VOC/gal mineral spirits</i>
4. Equivalent Allowable Emissions: <i>0.54 lb/hr</i> <i>2.2 tons/year</i>
5. Method of Compliance: <i>Maintaining records of of mineral spirits specifications and usage.</i>
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): <i>62-212.400(5)(c), F.A.C., Best Available Control Technology</i>

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

E.

1. Basis for Allowable Emissions Code: <i>Rule</i>
2. Future Effective Date of Allowable Emissions: <i>03-APR-1995</i>
3. Requested Allowable Emissions and Units: <i>Other: 5.84 lb VOC/gal heptane</i>
4. Equivalent Allowable Emissions: <i>5.0 lb/hr</i> <i>20.5 tons/year</i>
5. Method of Compliance: <i>Maintaining records of heptane specifications and usage.</i>
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): <i>62-212.400(5)(c), F.A.C., Best Available Control Technology</i>

F. VISIBLE EMISSIONS INFORMATION

This subsection of the Application for Air Permit form must be completed for only those emissions units which are subject to a visible emissions limitation. The intent of this subsection of the form is to identify each activity associated with the emissions unit addressed in this section for which a separate opacity limitation would be applicable. Visible emission subtype codes for each such activity are listed in the instructions for Field 1. Most emissions units will be subject to a "subtype VE" limit only.

Visible Emissions Limitation: Visible Emissions Limitation 0 of 0

1. Visible Emissions Subtype: N/A			
2. Basis for Allowable Opacity:		<input type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Requested Allowable Opacity:			
Normal Conditions:	%	Exceptional Conditions:	%
Maximum Period of Excess Opacity Allowed:			min/hour
4. Method of Compliance:			
5. Visible Emissions Comment:			

G. CONTINUOUS MONITOR INFORMATION

This subsection of the Application for Air Permit form must be completed for only those emissions units which are required by rule or permit to install and operate one or more continuous emission, opacity, flow, or other type monitors. A separate set of continuous monitor information (Fields 1-6) must be completed for each monitoring system required.

Continuous Monitoring System: Continuous Monitor 0 of 0

1. Parameter Code:		<i>N/A</i>	
2. CMS Requirement:		<input type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Monitor Information:			
Manufacturer:			
Model Number:		Serial Number:	
4. Installation Date (DD-MON-YYYY):			
5. Performance Specification Test Date (DD-MON-YYYY):			
6. Continuous Monitor Comment:			

**H. PREVENTION OF SIGNIFICANT DETERIORATION (PSD)
INCREMENT TRACKING INFORMATION**

This subsection of the Application for Air Permit form must be completed for all applications, not just those undergoing prevention of significant deterioration (PSD) review pursuant to Rule 62-212.400, F.A.C. The intent of this subsection is to make a preliminary determination as to whether the emissions unit addressed in this Emissions Unit Information Section consumes PSD increment. PSD increment is consumed (or expanded) as a result of emission increases (decreases) occurring after pollutant-specific baseline dates. Pollutants for which baseline dates have been established are sulfur dioxide, particulate matter, and nitrogen dioxide.

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide? *N/A*

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

-] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
-] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.
-] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
-] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
-] None of the above apply. If so, the baseline emissions of the emissions unit are non-zero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

Emissions Unit Information Section 1 of 1

2. Increment Consuming for Nitrogen Dioxide? *N/A*

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- None of the above apply. If so, the baseline emissions of the emissions unit are non-zero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code: <i>N/A</i>			
PM	<input type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown
SO2	<input type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown
NO2	<input type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown
4. Baseline Emissions: <i>N/A</i>			
PM	lb/hour	tons/year	
SO2	lb/hour	tons/year	
NO2		tons/year	
5. PSD Comment:			

Emissions Unit Information Section 1 of 1

I. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the emissions unit addressed in this Emissions Unit Information Section. Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

Supplemental Requirements for All Applications

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>Figure 2-1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u>Report</u> <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 1 of 1

Additional Supplemental Requirements for Category I Applications Only *N/A*

10. Alternative Methods of Operation [] Attached, Document ID: ____ [] Not Applicable
11. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: ____ [] Not Applicable
12. Enhanced Monitoring Plan [] Attached, Document ID: ____ [] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: ____ [] Not Applicable
14. Acid Rain Application (Hard copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: ____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: ____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: ____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: ____ [] Not Applicable

SUPPLEMENTAL REPORT FOR:

GAINESVILLE LID PLANT

**APPLICATION TO MODIFY
AIR POLLUTION SOURCES**

Submitted by:

METAL CONTAINER CORPORATION

Gainesville, Florida

and

St. Louis, Missouri

Prepared by:

ECT

Environmental Consulting & Technology, Inc.

***3701 Northwest 98th Street
Gainesville, Florida 32606***

ECT No. 94273-0200

February 1995

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1.0 INTRODUCTION

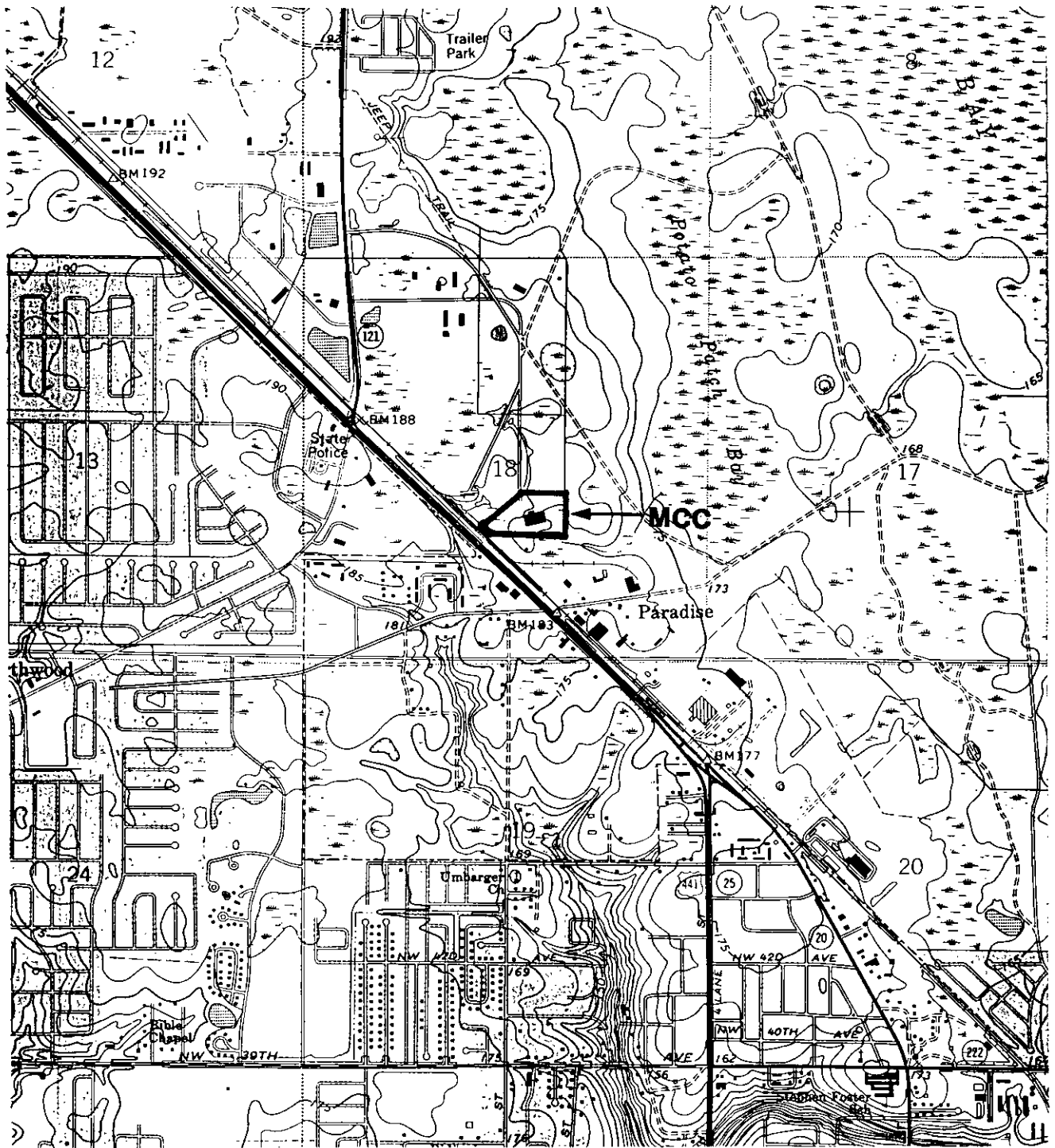
Metal Container Corporation (MCC) operates a lid manufacturing plant in Gainesville, Florida. Figure 1-1 shows the plant location. The facility produces lids that are used for beverage cans. To ensure an adequate seal between the lid and the beverage can, a "gasket" of end sealant compound is applied to the lid. This lid-to-can seal must meet stringent specifications set forth by MCC customers. To meet these specifications, MCC plans to change end sealant compounds. To avoid loss of contracted business, the plant must make the change as quickly as possible. However, the alternate end sealant compounds that are available involve some differences in volatile organic compound (VOC) content, which has created the need to modify the plant's operating permit.

A preapplication meeting was held in FDEP offices in Tallahassee on June 28, 1994, to discuss the regulatory aspects of the proposed modification. Appendix A contains notes from the meeting. The contents of this application were tailored to meet the specific needs identified by Florida Department of Environmental Protection (FDEP) staff.

The potential emissions that are currently allowed by permit AO 01-220792 are:

- Total end sealant VOC content of 3.2 pounds per gallon (lb/gal) (less water).
- 118 pounds per hour (lb/hr) of VOC (plant wide).
- 484 tons per year (tpy) of VOC (plant wide).
- N-hexane emissions are limited by acceptable ambient concentration (AAC) levels specified in the permit.

In August 1994, FDEP, at MCC's request, revised the permit to reflect appropriate no-threat levels for the facility's emissions. Appendix B contains MCC's request letter and FDEP's response. This administrative permit revision allowed a temporary solution to the need for a compound change. The facility switched to DAREX S9357MHV, which it currently is using. This compound has the following characteristics:



SCALE 1:24 000

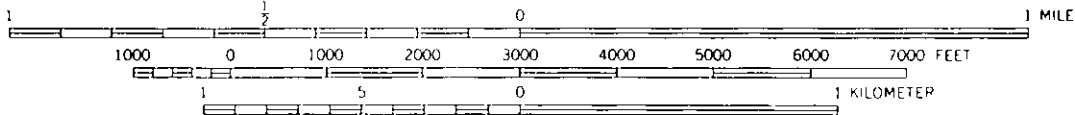


FIGURE 1-1.
SITE LOCATION MAP

Source: ECT, 1994.

ECT
Environmental Consulting & Technology, Inc.

- Total VOC content of 3.2 lb/gal (less water).
- N-hexane content of 12 percent.
- Cyclohexane content of 18 percent.

The permanent solution is the use of DAREX SLC 4357NP, a heptane-based compound. This compound has no n-hexane, a U.S. Environmental Protection Agency (EPA)-designated hazardous air pollutant (HAP), reflecting MCC's commitment to eliminate n-hexane wherever possible. This compound has the following relevant characteristics:

- Total VOC content of 3.5 lb/gal (less water).
- No n-hexane.
- Cyclohexane content of 17 percent.

DAREX SLC 4357NP is currently being used at MCC's Oklahoma City plant. Since the new compound has a higher VOC content than allowed by the current Gainesville operating permit, MCC is applying to FDEP for a permit modification to allow its use.

Other changes to plant operations that reduce the effect of the new compound's higher VOC content include: decreases in lid sizes, the use of pre-lubricated tab stock, and a reduction in the use of mineral spirits caused by the ability to substitute mineral oil in most cases. The net effect of these changes, including the compound change, will be to reduce the plant's total permitted VOC emissions from 484 to 319 tpy, a decrease of 34 percent. In addition, total plant emissions of n-hexane will be drastically reduced, since the proposed new end sealant compound contains none of this organic constituent. Therefore, the overall effect of the proposed changes is positive environmentally.

Based on the FDEP guidance provided in the preapplication meeting, Section 2.0 of this application describes the proposed modification, including changes in emissions. Section 3.0 considers issues associated with best achievable control technology (BACT), while Section 4.0 presents proposed new operating permit conditions. Appendices contain information and details referenced in the text.

As a final introductory note, MCC intends that this requested permit modification represent a transitional step toward the Title V operating permit, for which MCC will apply in November 1995. First, the new permit application form, which was developed for the purposes of the Title V program, has been used, as required.

Second, MCC has chosen to define the *emissions unit* as the entire facility, since the equipment and operations cannot functionally be grouped into smaller units (see Section 4.0 for further discussion). This emissions unit definition will be carried forward in the Title V operating permit application. Based on this approach, MCC proposes to eliminate emission limitations on a per-module basis. Notably, the definition of the facility as the emissions unit is consistent with the recordkeeping provisions specified in the current operating permit; these recordkeeping requirements are all on a facility-wide basis.

And third, MCC proposes to eliminate the lid production and material (aluminum and tab stock) input limitations contained in the current operating permit. These limitations are redundant with respect to the overall facility-wide VOC emission limit: emissions result directly from the use of compounds and solvents, not the production of lids, as such. The specific conditions in the current permit acknowledge this in that compliance recordkeeping associated with the usage of coatings and solvents *is* required, while recordkeeping associated with production *is not* required. Therefore, as MCC is able, over time, to reduce the quantities of compounds and solvents used per lid (for reasons discussed later in this report), production need not be artificially constrained. While eliminating the production-related limitations, MCC proposes concurrently to *tighten* the associated limitation on the maximum usage rate of all compounds and solvents. This is consistent with MCC's program of reducing compound and solvent usage, as stated previously.

2.0 DESCRIPTION OF THE PROPOSED MODIFICATION

2.1 OVERVIEW OF EXISTING OPERATIONS

In August of 1990, MCC submitted a permit application for the modernization of the Gainesville lid manufacturing plant. This modernization project was intended to increase the facility's annual production capacity from 6.5 billion to 11.4 billion lids by the removal of some existing equipment and the addition of new equipment, including shell presses, end liners, conversion presses, a scrap cyclone, and supporting equipment. Permitted VOC emissions were proposed to increase from 323 tpy to 567 tpy as a result of the modernization project.

The construction permit for the project was ultimately issued by June 28, 1991 (AC 01-185835 and PSD-FL 153). The operating permit (AO 01-220792) was originally issued on March 19, 1993, and was revised on July 2, 1993. The operating permit currently controls the operations of the equipment listed in Table 2-1. Figure 2-1 shows the basic process flow diagram for Modules 4 through 7 (Modules 1 through 3 were removed as part of the modernization project). Material inputs (Items 1 through 5 in Figure 2-1) are shell stock, tab stock, end sealant compound, tab lube, and cleanup solvents, respectfully. Material outputs (Items 6 through 7) are scrap aluminum and the finished lids. Emissions (Items 8 through 10) are end sealant VOC from the end liners, tab lube VOC from the conversion presses, and VOC from the use of cleanup solvents.

The key emissions-related permit limitations are provided in Specific Conditions 4 and 6. Specific Condition No. 4 limits the VOC contents of coatings and solvents as follows:

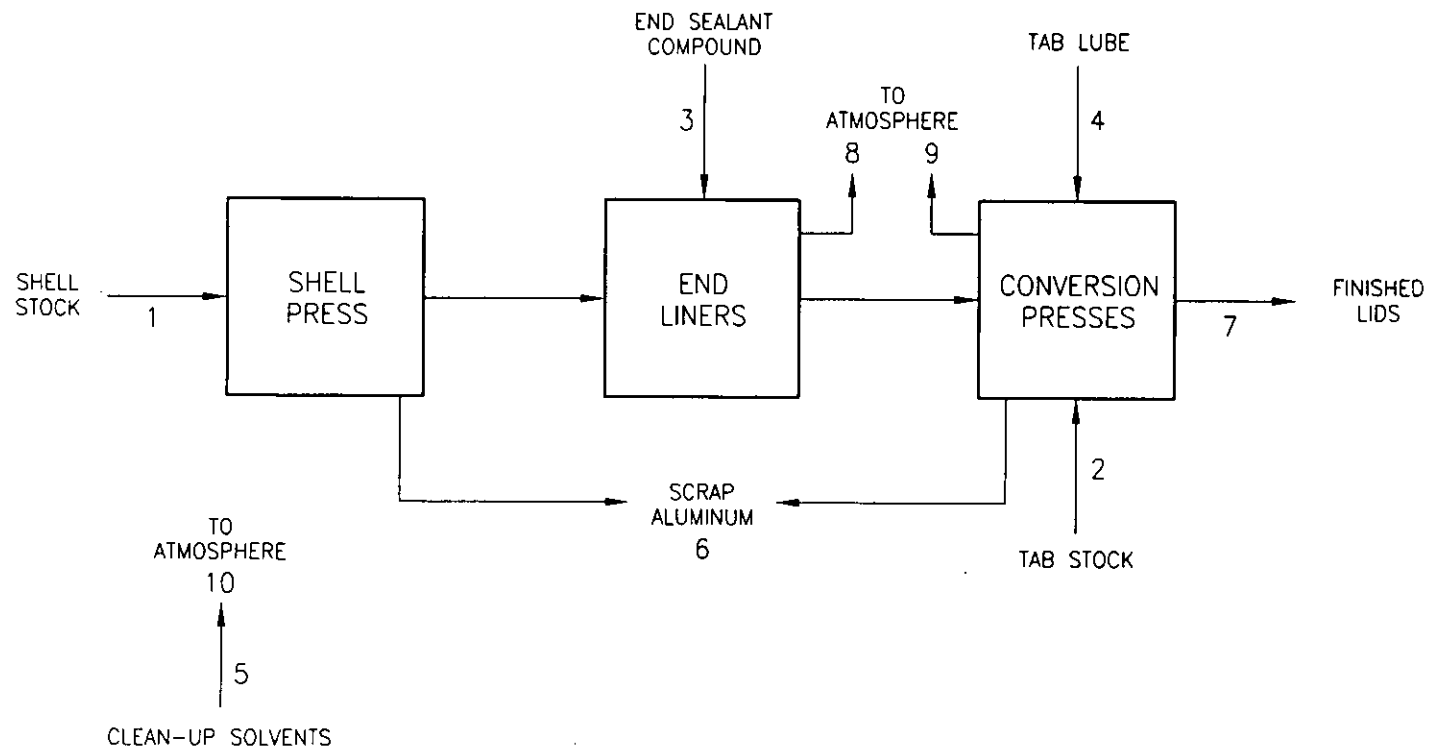
- End sealant—3.2 pounds of volatile organic compound per gallon (lb VOC/gal) (excluding water).
- Tab lube—6.0 lb VOC/gal (excluding water).
- Cleanup solvents—6.32 lb VOC/gal mineral spirits; 5.84 lb VOC/gal heptane.

Specific Condition No. 6 limits total VOC emissions from the facility as follows:

Table 2-1. Current Gainesville Lid Plant Equipment Configuration and Production Capacities

Production Module	Equipment Quantities			Production Capacity Lids/Yr (billion)
	Shell Presses	End Liners	Conversion Presses	
4	1	2	2	1.182
5	1	4	3	2.659
6	1	5	3	2.659
7	1	5	2	1.773
Offline Presses	<u>0</u>	<u>0</u>	<u>2</u>	<u>1.773</u>
Plant Totals	4	16	12	10.047

Sources: MCC, 1994.
ECT, 1994.



ECT Number: 94273-0200
 Last Update: 07/15/94
 File: C:\ACAD\94273\ABFLOW

FIGURE 2-1.
 PROCESS FLOW DIAGRAM, MODULES 4-7

Source: MCC, 1994.



<u>Module</u>	<u>Emission Limits</u>	
	<u>lb/hr</u>	<u>tpy</u>
4	15.9	65.4
5	32.9	135.2
6	32.9	135.2
7	29.8	122.1
Offline Presses	<u>6.4</u>	<u>26.1</u>
TOTALS	118	484

Also, Specific Condition No. 5 places implicit emission limitations on individual VOCs (e.g., n-hexane) by the imposition of AAC levels.

The modernization project has been implemented over the past several years, as the new equipment has been integrated, placed into operation, and "de-bugged." During this time, lid sizes have been changing, the trend being to smaller lids which require less aluminum and are therefore less costly to produce. In 1994 both "206" lids (i.e., lids with a diameter of 2 ⁶/₁₆ inches), and "204" lids (i.e., lids with a diameter of 2 ⁴/₁₆ inches) were manufactured.

Current operations involve the use of the following coatings and solvents, consistent with the permit, as revised:

<u>Coating/Solvent</u>	<u>Typical Manufacturer's Identification</u>	<u>VOC Content (lb/gal)</u>
End sealant	DAREX S9357MHV	3.2
Tab lube	Jenkin-Guerin #3810	6.0
Cleanup solvents	Texsolve C (heptane)	5.8
	Mineral spirits	6.3
	Isopar H (mineral spirits)	6.3

2.2 PROPOSED MODIFICATION

MCC proposes to modify its operations at the Gainesville facility by changing end sealant compounds from DAREX S9357MHV, which is a hexane-based compound, to DAREX SLC 4357NP-57.5, a heptane-based compound. Appendix C contains the MSDS for DAREX SLC 4357NP-57.5. This compound has a VOC content of 3.5 lb/gal (less water). It has a density of 8.3 lb/gal, of which approximately 42 percent by weight is VOC, consisting of n-heptane and heptane isomers (approximately 20 percent), cyclohexane (approximately 17 percent), isopropyl alcohol (approximately 4 percent), and octane and isomers (approximately 1 percent).

As a result of this modification, emissions from the end liners will change. Based simply on the fact that the VOC content of the compound will increase from 3.2 lb/gal to 3.5 lb/gal, it would be expected that VOC emissions from this emission unit would increase. However, as mentioned earlier, lid sizes are decreasing, which results in the use of less compound. The emission limits provided in the operating permit premise the use of 0.0169 gallons of end sealant per 1,000 lids (gal/1,000 lids). Usage rates for the smaller (i.e., 204) lids are expected to be approximately 20 percent less.

In addition, the composition of the VOC emissions will change. The proposed compound has no n-hexane, but somewhat more cyclohexane, relative to the currently used compound. It is important to note that n-hexane is designated an HAP, while cyclohexane is not. Therefore, emission of an HAP will be traded for those of a much less toxic, non-HAP, providing an obvious net environmental benefit.

Furthermore, starting in 1994, a gradual change to pre-lubricated tab stock began, reducing the requirements for tab lube. Also, the change in end sealant compound will ultimately eliminate the need for the cleanup solvent Isopar H (mineral spirits), which is being replaced with mineral oil. Mineral oil has no VOC, relative to the current permit limit of 6.3 lb VOC/gal for mineral spirits. Therefore, significant reductions in actual as well as potential emissions have been realized at the facility.

2.3 EMISSIONS CHANGES AND RESULTING REVIEW REQUIREMENTS

In this section, guidance provided by EPA and FDEP in the following sources is relied upon:

- EPA memorandum regarding the definition of “net emissions increase” (EPA, 1989).
- The draft “New Source Review Workshop Manual” (EPA, 1990).
- The federal regulations pertaining to prevention of significant deterioration (PSD) (40 Code of Federal Regulations [CFR] 52.21).
- The FDEP regulations pertaining to preconstruction review of stationary sources (Chapter 62-212, Florida Administrative Code [F.A.C.]).

Per EPA guidance (see especially the New Source Review manual, beginning at page A.44), the emissions increases from the proposed project must be evaluated first. For the proposed modification, the relevant emissions changes result from the change in end sealant compound, the reduction in lid sizes, the transition to pre-lubricated tab stock, and the phasing out of Isopar H. The net emissions increase is, by definition, equal to the difference in actual emissions before and after the change. Actual emissions before the change equal “. . . the average rate, in tons per year, at which the source actually emitted the pollutant during the two year period which precedes the particular date and which is representative of the normal operation of the source.” Actual emissions after the change must be assumed to be equal to the emissions unit’s potential to emit.

It is noteworthy that actual emissions before the change must be representative of normal operations. FDEP “. . . may allow the use of a different time period upon a determination that it is more representative of the normal operation of the source.”

For the Gainesville Lid Plant, the most representative period of normal operations would be calendar year 1993. During most of 1994, production was limited artificially by the situation being addressed in this application. In 1992, production was also less than “normal” due to the initial implementation of the modernization project; i.e., the plant

had not yet ramped up production to levels at all close to those associated with the modernization project. Production in 1993 had still not reached capacity. Nonetheless, calendar year 1993 is the most representative period and is used for the "before" actual emissions. Based on the 1993 Annual Operation Report submitted to FDEP, total VOC emissions from the plant were 282.7 tpy (see Appendix D).

The potential VOC emissions after the change are estimated as shown in Table 2-2, assuming that production will be comprised of approximately 38 percent 206, 62 percent 204. So, 319.1 tpy is used for the potential emissions after the change. Thus, the net emissions increase is:

$$319.1 \text{ tpy} - 282.7 \text{ tpy} = 36.4 \text{ tpy}$$

Returning to the EPA and FDEP guidance and regulations, the VOC emissions increase of 36.4 tpy is compared to the "significant emission rate," or PSD review threshold, of 40 tpy. Since the increase due to the proposed modification is less than significant, PSD review does not apply.

Considering the emissions changes associated with the proposed modification, i.e., the change in end sealant compound and other changes, the facility's overall VOC emissions potential is reduced from 118 lb/hr and 484 tpy (the current permit limits) to 78 lb/hr and 319 tpy.

While formal PSD review does not apply to the proposed modification, the change in end sealant compound will require the relaxation of the VOC content limitation of 3.2 lb VOC/gal (less water) provided in Specific Condition No. 4 of the operating permit. The new limit is proposed to be 3.5 lb VOC/gal (less water). Because the original limit was part of an assessment of BACT, a re-examination of BACT was requested by FDEP (see Section 3.0).

Table 2-2. Calculation of Post-Modification VOC Emissions

Compound	Density (lb/gal)	VOC Content (wt fraction)	Usage Rate (gal/ 1,000 lids)	Production Rate (1,000 lids)	VOC Emissions (tpy)
DAREX 4357NP (end liner)	8.3	0.417	0.0165	3,818,000*	109.0
DAREX 4357NP (end liner)	8.3	0.417	0.0132	6,229,000†	142.3
J-G 3810 (tab lube)	6.35	0.945	0.0015	10,047,000	45.2
Texsolve C (cleanup solvent- heptane)	5.81	1.000	0.0007	10,047,000	20.4
Mineral spirits (cleanup solvent)	6.31	1.000	0.00007	10,047,000	2.2
TOTAL					319.1

*Production of "206" lids.

†Production of "204" lids.

Sources: MCC, 1995.
ECT, 1995.

Finally, Table 2-3 compares the potential emissions (entire plant) of individual VOCs before and after the proposed modification. Emissions of n-hexane will be almost entirely eliminated, as will emissions of toluene and benzene. Cyclohexane emissions will also decrease by approximately 29 tpy. Only emissions of n-heptane will increase, by approximately 78.2 tpy. Because: (1) emissions of designated HAPs will all decrease, and (2) heptane is no longer addressed in the facility's permit, it was determined that no modeling analysis was needed to re-assess compliance with FDEP's air toxics policy.

Table 2-3. Comparison of Individual VOC Emissions: Before and After Proposed Modification

Pollutant	Emissions Before Modification*		Emissions After Modification†	
	lb/hr	tpy	lb/hr	tpy
N-hexane	22.0	90.3	0.2	0.8
Hexane isomers	8.9	36.5	0.0	0.0
Cyclohexane	32.0	131.4	25.0	102.5
N-heptane**	14.8	60.7	33.8	138.9
Toluene	0.4	1.7	0.1	0.5
Benzene	0.002	0.01	<0.001	<0.01

*Based on maximum permitted operations and the use of DAREX S9357MHV end sealant compound.

†Includes change in end sealant compound and other plant changes, as described in Section 2.2.

**Includes heptane isomers.

Sources: MCC, 1995.
ECT, 1995.

3.0 BACT CONSIDERATIONS

3.1 SUMMARY OF PREVIOUS BACT ANALYSIS AND DETERMINATION

MCC's original 1990 BACT analysis (April 25, 1991, supplement to original August 15, 1990, submittal) evaluated three methods of limiting or controlling VOC emissions from the two modules affected by the modernization project (designated in the permit as Modules 5 and 7):

1. Collection and destruction of VOC emissions through the use of thermal incineration.
2. Use of non-VOC (i.e., water-based) end sealant compound.
3. Use of low VOC/high solids end sealant compound (proposed as BACT).

The evaluation of the collection and destruction system using a thermal oxidizer on the two modules identified numerous technical concerns. These included:

1. The need for full enclosure of liners, conveyors, and balancers to achieve any appreciable emissions capture.
2. Special materials required for the enclosures (Lexan and stainless steel).
3. Doors in the enclosures to allow fork truck access.
4. High air flow needs to meet health and safety requirements.
5. Production losses due to operational and maintenance inefficiencies.
6. The need for construction of a natural gas pipeline to the facility to supply the thermal oxidizer.

In addition to the questionable technical feasibility of such a system, the economic analysis showed a cost effectiveness of \$16,500 per ton of VOC removed. Based on this significant economic impact, along with the unknown technical feasibility, a thermal oxidizer system was not considered viable.

Likewise, the use of water-based end sealant was not considered viable due to production inefficiencies and high equipment costs. These factors resulted in a cost effectiveness of \$7,013 per ton of VOC removed.

MCC also cited the only other recent BACT determinations for can lid manufacturing plants. The first, dating from 1986, showed that BACT for a modified source was the use of end sealant compound with a VOC content of 4.2 lb/gal minus water. The second, from 1988, determined that BACT for a new source was the use of an end sealant compound with a VOC content of 3.7 lb/gal.

In its Final Determination, FDEP agreed “. . . that the use of high solid/low VOC end sealant represents BACT for the proposed modernization of the [MCC] facility.” Based on this determination, a BACT limit of 3.2 lb/gal was established.

3.2 BACT REVIEW OF THE PROPOSED MODIFICATION

The proposed modification will result in a relaxation of the existing permit limitation for end sealant compound of 3.2 lb/gal less water. The proposed new permit limit is 3.5 lb/gal less water. Therefore, FDEP requested a re-examination of BACT issues.

As a first step, the BACT/LAER Information System (BLIS) was interrogated to identify any relevant BACT determinations that have been made since MCC's original (i.e., 1990) application. The only listing other than the two already mentioned (see Section 3.1) was the 3.2 lb/gal limit established for the Gainesville plant. In other words, if revised to 3.5 lb/gal, the limitation for the Gainesville plant would still be more stringent than the limitations imposed upon other similar facilities.

Thermal incineration is still considered extremely questionable from a technical standpoint for all the reasons cited in the original evaluation. Costs will be more prohibitive than originally quantified, given inflation and the need for additional enclosures and a larger thermal oxidizer. As demonstrated in the previous analysis, these technical and economic constraints preclude thermal incineration from consideration as a viable control option for lid plants.

A portion of the operating inefficiencies associated with water-based compound that were cited in the earlier analysis have been reduced. However, the economic penalty remains

very severe. The process also has an environmental drawback due to ammonia being emitted from the drying operations which are required to minimize the cure time of the water-based end sealant.

Details of the cost analysis (in 1994 dollars) to convert the facility to water-based end sealant are presented in Appendix E. A capital investment of \$4,450,000 would be required for conversion. This includes equipment and installation costs for new tankage, piping, lid dryers, and instrumentation. Annualized costs, which include additional energy consumption by the dryers and increased end sealant costs, would be \$1,435,000.

Potential VOC emissions would be reduced by 251 tpy. The resulting cost effectiveness of water-based end sealant compared to the proposed BACT of low VOC/high solids end sealant is therefore over \$5,700 per ton of VOC removed. Thus, the use of water-based end sealant is not BACT, given these high costs.

In summary, a rigorous BACT analysis, including detailed and itemized costs for capital and annual cost components, was performed in 1990 to 1991 for Modules 5 and 7. This earlier analysis was subject to intense review and scrutiny by the staff of FDEP. The results, approved by FDEP, showed that the use of a low VOC/high solids compound was BACT. The new, updated analysis presented here relies on the conclusion of the earlier analysis for the technical and economic infeasibility of thermal incineration at a lid plant, and updates the economics associated with the use of water-based compound. The results of both these analyses show that neither the use of a water-based end sealant compound nor thermal incineration would be cost-effective alternatives, relative to the use of a low VOC/high solids end sealant compound. Therefore, considering: (1) industry precedent (BACT/LAER Information System), (2) technical feasibility, and (3) economic reasonableness, BACT for lid plants is the use of low VOC/high solids end sealant compound.

4.0 PROPOSED REVISIONS TO OPERATING PERMIT CONDITIONS

MCC proposes a number of revisions to the current operating permit for the Gainesville Lid Plant. These proposed changes first reflect the modifications to plant operations that are the subject of this application. Second, they acknowledge the definition of the plant as the emissions unit. And third, they eliminate limits on plant production, as such limits are redundant and unnecessary.

It is appropriate to consider the plant as the emissions unit for two basic reasons:

1. The production equipment (e.g., shell presses, end liners, and conversion presses) is interchangeable. That is, designated "modules" do not necessarily function independently. For example, the shell presses associated with one module may very well provide shells to another module.
2. Emissions of VOC do not occur entirely at specific points or pieces of equipment. Volatilization of end sealant compound and tab lube, for example, occurs over a period of time as an individual lid moves through the plant.

Therefore, it would be impossible to accurately track emissions by any other basis than plant wide. The current operating permit recognizes this in its recordkeeping requirements, which are geared exclusively to the facility, not to modules or pieces of equipment.

Production limitations, specifically limits on maximum annual production and material input, are redundant and unnecessary because emissions result directly from the use of compounds and solvents, not production. The use of compounds and solvents will, over time, *not* be directly proportional to production, due to reasons discussed earlier (e.g., the production of smaller lids, which require less end sealant compound, and the use of prelubricated tab stock). A facility-wide VOC emission limit precludes the need for limits on production.

Consistent with the previous discussion, MCC proposes the following revisions to the specific conditions contained in AO 01-220792:

1. ~~Delete~~ the references to maximum production and input rate limitations. ~~Replace~~ "0.0241 gallons/1000 lids" with "0.019 gallons/1000 lids."
2. No change.
3. No change.
4. ~~Replace~~ "3.2 lbs VOC/gal" with "3.5 lbs VOC/gal."
5. ~~Replace~~ the listed no-threat levels with the following (to reflect current FDEP policy):

<u>Pollutant</u>	<u>No-Threat Levels ($\mu\text{g}/\text{m}^3$)</u>		
	<u>8-Hour</u>	<u>24-Hour</u>	<u>Annual</u>
n-Hexane	1,760	422.4	200
Toluene	--	--	300
Benzene	--	--	0.123

6. ~~Delete~~ the references to emissions limits for individual modules. ~~Change~~ the facility's emission limits from 118 lb/hr and 484 tpy to 78.0 lb/hr and 319.1 tpy.
7. through 20. No changes.

A markup copy of the operating permit with all of these revisions indicated is provided in Appendix F.

APPENDIX A
PREAPPLICATION MEETING NOTES

MEETING NOTES

GAINESVILLE LID PLANT MODIFICATION PREAPPLICATION MEETING

Date: June 28, 1994

Location: FDEP Offices, Tallahassee

Purpose: To discuss regulatory requirements associated with a proposed change in end sealant compounds.

Attendees: FDEP

Preston Lewis
Theresa Heron
Cleve Holiday
John Glunn

Representing MCC

Dean Pusch (A-B)
Jeff Meling (ECT)

Meeting Summary:

1. Dean Pusch presented the meeting agenda (see copy, attached) and described the facility, its operations, and its emissions sources.
2. Dean Pusch described the existing production difficulty associated with the end sealant compound and how the problem could be solved by switching compounds. He stated that A-B/MCC is getting away from hexane-based compounds (HAP) in favor of heptane-based compounds (non-HAP).
3. FDEP staff expressed their general thoughts on the situation. They questioned whether odor would be caused by the change in compound (it would not). They indicated that increases in emissions would require a permit modification and emphasized that proposed emissions would need to be compared to actuals.
4. Dean Pusch outlined the proposed temporary solution to the problem, that being a switch to an alternate hexane-based compound. This solution would not involve an increase in emissions. He explained the new air quality modeling results and the fact that modeling demonstrated compliance with the FDEP no-threat levels but not with the acceptable ambient concentration (AAC) levels included with the permit.
5. The procedure to implement the proposed temporary solution was discussed. FDEP indicated that it could be handled as an *Administrative Revision* and that a

letter to FDEP would suffice. The letter should: (a) explain the reason for the change in compound, including the relief of a quality/production problem; (b) emphasize that less HAP emissions would result; (c) quantify relevant emissions and concentrations; (d) identify the apparent error in the permit's AAC levels relative to no-threat levels, and request that the AAC levels be corrected; (e) state the timing of the change in compounds; and (f) include a fee of \$250. Dean Pusch emphasized the need for speedy approval; he stated that the letter requesting the revision would be submitted within several days.

6. The proposed permanent resolution was discussed next. FDEP stated that, given some VOC emission increase, the change to a heptane-based compound should be handled as a minor permit modification. Since BACT would need to be relaxed, BACT issues, including feasibility of incineration, should be revisited. Modeling issues should also be revisited. FDEP suggested that A-B/MCC provide new permit conditions for FDEP's consideration. FDEP stated that a total time to issuance would be 90 days (worst case), with 60 days more likely. Public notice (14-day) would be required. The permit fee would be consistent with regulations.
7. The meeting was adjourned.

LID END SEALANT CHANGE

METAL CONTAINER CORPORATION - GAINESVILLE LID CENTER

JUNE 28, 1994 MEETING AGENDA

NEED FOR END SEALANT CHANGE

TEMPORARY RESOLUTION

SWITCH TO S9357 MHV (HEXANE)

- LOWER N-HEXANE CONTENT**
- HIGHER CYCLOHEXANE CONTENT**
- NO THREAT LEVELS - PERMIT VS CURRENT**

PERMANENT RESOLUTION

SWITCH TO S9357 NP LV (HEPTANE)

- NO N-HEXANE**
- LOWER CYCLOHEXANE CONTENT THAN S9357 MHV**
- HIGHER VOC CONTENT**

CONCURRENT EMISSION REDUCTIONS

- USE OF PRE-LUBRICATED TAB STOCK**
- LID SIZE CHANGE (204 VS 206)**
- EFFICIENCY IMPROVEMENTS**

NET EMISSIONS CHANGE

PERMIT STRATEGY

TIMING

APPENDIX B

1994 ADMINISTRATIVE REVISION



ANHEUSER-BUSCH COMPANIES

July 1, 1994

Mr. Clair Fancy
Bureau of Air Regulation
Florida Department of Environmental Protection
Mail Stop 5500
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: *Metal Container Corporation, Gainesville Lid Plant*
Request for Administrative Revision to Permit No. A001-220792

Dear Mr. Fancy:

Metal Container Corporation (MCC) requests an Administrative Revision to the referenced permit associated with its lid manufacturing plant located in Gainesville, FL. As explained more fully in the following, this regulatory action will provide MCC with a temporary solution to a problem that, unless resolved, poses a severe economic impact to the plant. A permanent solution, in the form of a permit modification, will be applied for as soon as possible.

As a further preface to the remainder of this letter, please note that a meeting took place with your staff, led by Mr. Preston Lewis, on Tuesday, June 28, 1994, to discuss this situation. The FDEP staff was extremely helpful, and I believe that the solutions we arrived at meet the primary objectives of:

1. Satisfying both the letter and spirit of FDEP rules and regulations.
2. Providing the public with the necessary notice as to our proposed operational changes.
3. Enabling the plant to continue operations, thus avoiding significant economic hardship.

MCC's Gainesville facility produces lids that are used for beverage cans. To meet contractual commitments, the plant must produce over 25 million lids per day. To ensure an adequate seal between the lid and the beverage can, a "gasket" of end sealant compound is applied to the lid. This lid-to-can seal must meet stringent specifications set forth by MCC customers. Recent difficulties in meeting some of these specifications can be resolved by changing end sealant compound. In order to avoid loss of contracted business, the plant must make the change as quickly as possible.

However, the compounds available involve some differences in constituents making up the volatile organic compound (VOC) content, which has created the need to revise the plant's operating permit.

- The compound currently in use at the facility, DAREX S9384, has the following relevant characteristics:
 - Total VOC content of 3.1 pounds per gallon (less water)
 - N-hexane content of 26 percent
 - Cyclohexane content of 10 percent

The potential emissions that are allowed by permit A001-220792 (copy attached) are:

- Total VOC content of 3.2 pounds per gallon (less water)
- 118 pounds per hour (lb/hr) of VOC
- 484 tons per year (tpy) of VOC
- N-hexane and cyclohexane emissions are limited by acceptable ambient concentration levels specified in the permit.

A temporary solution to the plant's quality control problem involves switching to an alternate end sealant, DAREX S9357 MHV. This alternate compound has the following relevant characteristics:

- Total VOC content of 3.2 lb/gal (less water)
- N-hexane content of 12 percent
- Cyclohexane content of 18 percent

Since usage rates will decrease due to production of smaller diameter lids, it can be seen that total VOC emissions will continue to remain well below permitted levels. However, emissions of n-hexane will decrease while emissions of cyclohexane will increase.

It is important to note that n-hexane is designated a hazardous air pollutant (HAP), while cyclohexane is not. Therefore, while total VOC emissions will remain well below the permitted levels, emissions of an HAP will be traded for those of a much less toxic, non-HAP, providing a clear net environmental benefit.

The problem associated with this temporary solution to the need for a compound change--and hence the need to request this permit revision--is that modeling of emissions from the alternate compound has revealed the potential for exceeding the ambient cyclohexane limit specified in the permit. Our modeling projects maximum impacts of 459.4 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)(8-hour average)

and $373.6 \mu\text{g}/\text{m}^3$ (24-hour average). The permit contains acceptable ambient concentration limits of $1,000 \mu\text{g}/\text{m}^3$ (8-hour average) and $238 \mu\text{g}/\text{m}^3$ (24-hour average). As can be seen, the projected 24-hour impact exceeds the permit limit.

Further research into this matter, however, has uncovered a potential error in the permitted ambient impact limitations. The current FDEP no-threat levels for cyclohexane are $20,600 \mu\text{g}/\text{m}^3$ (8-hour average) and $4,944 \mu\text{g}/\text{m}^3$ (24-hour average). Our projected modeled impacts, including the maximum 24-hour impact, as presented previously, are well below these no-threat levels. Furthermore, the no-threat levels for cyclohexane have not apparently been revised upward; i.e., the no-threat levels at the time the permit was issued were not different from the current levels. Therefore, we must conclude that the no-threat levels specified in the permit were in error.

As a result, MCC requests that Specific Condition No. 5 of its operating permit be revised to reflect the appropriate no-threat levels for cyclohexane. This will allow MCC to immediately implement the temporary switch to the alternate compound, while meeting its permit limitations by a wide margin.

As indicated previously, MCC is also pursuing a permanent solution to the need for a compound change. This solution involves the use of another end sealant compound, currently being used at MCC's Oklahoma City plant, that contains *no n-hexane and less cyclohexane* than the compound proposed as the temporary solution. This compound, however, has a higher VOC content than allowed by the permit. As indicated in our meeting, MCC is implementing concurrent emission reduction measures that will likely offset much of the increase due to the compound change.

Therefore, MCC will, as soon as possible, apply for a permit modification to allow the implementation of this permanent solution. We plan to submit the application for permit modification by the end of July. We understand that review and processing of this application will require public notification and a 14-day comment period.

In summary, MCC requests FDEP grant the Gainesville lid manufacturing plant an Administrative Revision to its operating permit to correct an apparent error in the ambient impact limitations associated with emissions of cyclohexane. Given our discussions in the meeting of the urgent need to resolve this situation, it is our understanding that the Bureau will be able to act on this request within a week. With this permit revision, MCC can implement a temporary solution to an operating problem with significant economic implications. This temporary solution

Mr. Clair Fancy
July 1, 1994
Page 4

would have a net environmental benefit by reducing emissions of n-hexane, a HAP. A check in the amount of \$250.00 is enclosed to cover the fee associated with the request.

Your timely processing of this request would be greatly appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Dean E. Pusch
Manager, Regulatory Issues
Environmental Affairs Department

cc: M. Accardo
P. Lewis, FDEP
J. Meling, ECT



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(A)

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	--

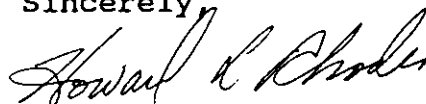
Mr. Dean E. Pusch
August 22, 1994
Page Three

- (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
Page Four

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. Boutwell 8/25/94
Clerk Date

APPENDIX C

MSDS FOR DAREX SLC 4357NP-57.5

GRACE

Dewey and Almy Chemical Division

W.R. Grace & Co.-Conn.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

July 21, 1994

Mr. Dean Push
Metal Container Corp.
Suite 400
3636 S. Geyer Road
St. Louis, MO 63127-1218

Dear Mr. Push:

Ms. Pam Horsefield has asked us to send you VOC information and a Material Safety Data Sheet for DAREX SLC 4357NP-57.5, which is produced by Grace Container Products.

The VOC (Volatile Organic Compound) value for this product is reported on the attached U.S.E.P.A. Coating Supplier VOC Data Sheets, along with other relevant information.

VOC levels are calculated using compound characteristics from our formulation information. Water is introduced into various solvent-based sealants through certain raw materials and processing steps. We use our best estimate of water levels for these calculations.

A Material Safety Data Sheet for this product is also enclosed. This form has been completed with our best judgment of the information currently available to us, and we hope it will be helpful to you.

If we can be of any further assistance, please let us know.

Very truly yours,

Cheryl A. Malcolm
Regulatory Coordinator
Process DevelopmentCAN/jwc
Enclosures

cc: Ms. P. Horsefield - Grace, Atlanta

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 COATING SUPPLIER
 VOC DATA SHEET

Coating Manufacturer: W. R. Grace & Company, GRACE Container Products
 Coating Identification: DAREX SLC 4357NP-57.5
 Batch Identification: ---
 Supplied To: Metal Container Corporation

Properties of the coating as supplied* to the customer:

A. Coating Density (D_c): 8.3 lb/gal 1.0 kg/l
 (ASTM D1475)

B. Total Volatiles (W_v): 42.0 Weight Percent
 ASTM D2369 Other**

C. Water Content: 1. (W_w): 0.3 Weight Percent
 ASTM D3792 ASTM D4017 Other**

2. (V_v): 0.3 Volume Percent
 Calculated Other**

D. Organic Volatiles (W_o): 41.7 Weight Percent

E. Nonvolatiles Content (V_n): 42.4 Volume Percent

F. VOC Content (VOC): 3.5 lb/gal less water 0.4 kg/l less water
 and 8.3 lb/gal solids 1.0 kg/l solids

Remarks: All values have been calculated based on formulation
and processing information. The actual solvent density
has been used to calculate VOC content in lb/gal solids.

*The subscript "s" denotes each value is for the "as supplied" coating.
 **Identifies methods used under "Remarks".

Signed: Camelot Date: 7/21/94

SAFETY DATA

GRACE CONTAINER PRODUCTS
 W. R. Grace & Co. - Conn.
 55 Hayden Avenue
 Lexington, MA 02173

EMERGENCY PHONE NO. (617) 861-6600

-----**SECTION I - IDENTIFICATION**-----

PRODUCT (TRADE) NAME: DAREX® SLC 4357NP-57.5

General Chemical Description: Solvent-based sealant

-----**SECTION II - INGREDIENTS**-----

<u>Hazardous Ingredients</u>	<u>% by Weight</u>	<u>Maximum Exposure Value (ppm)</u> <u>(8 hour time-weighted average)</u>	
		<u>OSHA PEL*</u>	<u>ACGIH TLV**</u>
cyclohexane (CAS#110-82-7) (SARA Section 313 chemical)	17 approx.	300	300
heptane isomers	14 approx.	400 (500 STEL) (for n-heptane)	400 (500 STEL) (for n-heptane)
n-heptane	6 approx.	400 (500 STEL)	400 (500 STEL)
isopropyl alcohol	4 approx.	400 (500 STEL)	400 (500 STEL)
octane and isomers	1 approx.	300 (375 STEL)	300 (375 STEL)

* 29 CFR Section 1910.1000, July 1, 1992

** 1993-1994 recommendation, American Conference of Governmental Industrial Hygienists

Other Ingredients

Rubber, resin, filler, pigment, and modifiers.

% by Weight

58 approx.

-----**SECTION III - PHYSICAL DATA**-----

Vapor density of n-heptane (air=1): 3.5

Specific Gravity (water=1): 1 approx.

Solubility in water: not soluble

Volatiles, (% by weight): 42 approx.

Appearance and Odor: Gray liquid; petroleum solvent odor

-----**SECTION IV - FIRE AND EXPLOSION HAZARD DATA**-----

Flash Point: below 20°F (Pensky-Martens)

Flammable Limits: (cyclohexane) 1.3 - 8.0%

Extinguishing Media: Carbon dioxide, dry chemical, foam.

Fire-fighters should wear the usual protective gear, self-contained breathing apparatus.

Combustion will result in the release of the usual decomposition products including oxides of carbon.

-----**SECTION V - REACTIVITY DATA**-----

Product is stable; hazardous polymerization will not occur.

Incompatible with strong oxidizers.

PREPARED 07/21/94

"The data included herein are presented according to W. R. Grace & Co.-Conn.'s practices current at the time of preparation hereof, are made available solely for the consideration, investigation and verification of the original recipients hereof and do not constitute a representation or warranty for which Grace assumes legal responsibility. It is the responsibility of a recipient of this data to remain currently informed on chemical hazard information, to design and update its own program and to comply with all regional, federal, state, and local laws and regulations applicable to safety, occupational health, right-to-know and environmental protection."

SAFETY DATA

DAREX® SLC 4357NP-S7.5

SECTION VI-SPILL OR LEAK PROCEDURES**Handling Precautions:** See Section VIII.**For small spills:** Wipe up, or absorb with sand or other absorbent material. Collect waste in sealed containers.**For large spills:** Dike area to prevent spreading. Shovel or pump to drum or salvage tank. Absorb residual material with sand, or other absorbent material.

Use only clean-up equipment approved for flammable materials and areas. Dispose of as a flammable material in accordance with current local, state, and Federal regulations.

EPA Hazardous Waste Number is: D001

SECTION VII-HEALTH HAZARD DATA**Threshold Limit Values:** See Section II.**Signs & Symptoms of Acute Exposure****Emergency First Aid Procedures****Inhalation:** Vapors can produce headache, nausea, dizziness, disorientation, numbness in fingers and toes, and irritation of nose and throat.

Remove to fresh air.

Eyes: Irritation upon direct contact.

Immediately flush eyes with water for at least 15 minutes; get medical attention.

Skin: Irritation upon direct contact.

Wash affected area with water; if irritation occurs and persists, get medical attention. Remove contaminated clothing.

Ingestion: Harmful if swallowed.

Dilute with water or milk; do not induce vomiting; get medical attention.

Chronic Effects: Prolonged or repeated overexposure to the solvent system by inhalation can produce central nervous system depression and/or nerve damage. Prolonged or repeated overexposure by skin contact can produce dermatitis.**Medical Conditions Aggravated by Overexposure:** Preexisting nervous system disorders and skin diseases may be aggravated.**GET MEDICAL ATTENTION IF SYMPTOMS PERSIST**

PREPARED 07/21/94

PAGE : 2 OF 3

SAFETY DATA

DAREX SLC 4357NP-57.5

SECTION VIII-SPECIAL PRECAUTIONS

Handling and Storing

- Wear neoprene gloves and protective clothing if direct contact likely; wear eye protection.
- Avoid skin and eye contact. Avoid breathing vapors.
- Treat as flammable material. Keep away from heat, sparks, and open flames.
- Avoid static electricity - ground containers when transferring product.
- Relieve possible internal pressure in container before opening by partially unscrewing bung.
- Vapors are heavier than air and will settle and collect in low areas and pits, displacing breathing air. Provide adequate ventilation to protect from these hazards and to keep below maximum exposure values.
- Empty containers retain hazardous product residues, both liquid and vapor.
- Keep container closed when not in use.

PREPARED 07/21/94

PAGE : 3 OF 3

APPENDIX D

1993 ANNUAL OPERATION REPORT

METAL CONTAINER CORPORATION
 GAINESVILLE LID MANUFACTURING FACILITY
 1993 FLORIDA DER ANNUAL OPERATION REPORT
 ACTUAL VOLATILE ORGANIC COMPOUND EMISSIONS

C:\11\GAINESVILLE\03AIR

TOTAL PLANT FOR TOTAL YEAR

COATING/SOLVENT	TYPICAL MANUFACTURERS IDENTIFICATION	USAGE (GALLONS)	DENSITY (LBS/GAL)	VOC CONTENT (WT FRACTION)	VOC EMISSIONS (TONS/YEAR)
END SEALANT COMPOUND	DAREX S9384	132,599	7.80	0.392	202.72
TAB LUBE	JENKIN-GUERIN #3810	19,464	6.35	0.945	58.40
CLEAN-UP SOLVENTS	TEXSOLVE C	4,884	5.81	1.000	14.19
	MINERAL SPIRITS	539	6.31	1.000	1.70
	ISOPAR H	1,815	6.30	1.000	5.72
TOTAL ANNUAL EMISSIONS					(SUBTOTAL SOLVENTS) 282.72
HOURLY EMISSION RATE	8592 HOURS/1993 =		65.8 LBS/HR		
DAILY EMISSION RATE	358 DAYS/1993 =		1579.5 LBS/DAY		
MONTHLY EMISSION RATE	11.9 MONTHS/1993 =		47516.4 LBS/MONTH		

NOTES: ACTUAL EMISSIONS ARE CALCULATED PER F.A.C. 17-213.200(e).

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APPENDIX E

COST ANALYSIS FOR WATER BASED END SEALANT

**GAINESVILLE LID PLANT
WATER-BASE END SEALANT COST ANALYSIS**

CAPITAL COSTS

DIRECT COSTS (1994 \$)

PURCHASED EQUIPMENT COST

PROCESS EQUIPMENT (TANKAGE, PIPING, DRYERS)	1,790,200
AUXILIARY EQUIPMENT	469,700

EQUIPMENT COST (EC)	2,259,900
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TAXES	142,000
FREIGHT (INCLUDED IN EC)	

PURCHASED EQUIPMENT COST (PEC)	2,401,900
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DIRECT INSTALLATION COST

MECHANICAL	521,500
PROCESS EQUIPMENT	130,800
ELECTRICAL	138,500
INSTRUMENTATION	154,900
SITE PREPARATION/DEMOLITION	69,100
BUILDINGS	61,000

DIRECT INSTALLATION COST (DIC)	1,075,800
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TOTAL DIRECT COST (DC)	3,477,700
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INDIRECT COSTS

ENGINEERING AND SUPERVISION	200,000
CONSTRUCTION AND FIELD EXPENSES	139,000
CONSTRUCTION FEE	216,900
START-UP (0.02PEC)	48,038
CONSTRUCTION CONTINGENCY	208,200
EQUIPMENT CONTINGENCY	158,300

TOTAL INDIRECT COSTS (IC)	970,438
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TOTAL CAPITAL INVESTMENT (TCI) = (DC + IC)	\$ 4,448,138
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**GAINESVILLE LID PLANT
WATER-BASE END SEALANT COST ANALYSIS**

page 2

ANNUAL COSTS (1994 \$)

COST DATA

ELECTRIC CHARGE (\$/KW-HR)	0.064
INTEREST	0.12
USEFUL LIFE (YEARS)	10
CAPITAL RECOVERY FACTOR (CRF)	0.1770

DIRECT ANNUAL COSTS

ANNUAL ELECTRICAL USAGE		168,192
WATER-BASE END SEALANT	1,507,050	
PROPOSED END SEALANT	1,205,640	
DIFFERENTIAL		301,410

DIRECT ANNUAL COST (DAC)		469,602
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INDIRECT ANNUAL COSTS

CAPITAL RECOVERY (CRF×TCI)	787,250
ADMINISTRATIVE CHARGES (0.02TCI)	88,963
PROPERTY TAX (0.01TCI)	44,481
INSURANCE (0.01TCI)	44,481

INDIRECT ANNUAL COST (IAC)		965,176
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TOTAL ANNUALIZED COST (DAC + IAC)		\$ 1,434,778
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EMISSION REDUCTION

EMISSIONS WITH BACT (PROPOSED SEALANT) (TONS/YEAR)	319
EMISSIONS USING WATER-BASE END SEALANT (TONS/YEAR)	67.9
NET REDUCTION (TONS/YEAR)	251.1

COST EFFECTIVENESS (\$/TON OF VOC REMOVED)		\$ 5,714
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Data Sources

OAQPS Control Cost Manual, USEPA, January, 1990
Anheuser-Busch Companies, Inc., September, 1994

APPENDIX F

MARKUP OF CURRENT OPERATING PERMIT

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 30,047 billion lids.~~ 0.019
 -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:

3.2 lbs VOC
 gal end sealant
 (excluding water)

6.0 lbs VOC
 gal tab lube
 (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	1,760	1,800 422.4	430 200
n-heptane	32,000	15,238	
cyclohexane	1,000	238	
cyclohexylmethane	32,000	7,619	
toluene	--	--	2,000 300
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: 31GVLO1004601
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	92.9	135.2
Module 6	32.9	135.2
Module 7	29.8	122.1
Off-line Conversion, Presses	6.4	26.1
Entire Facility	78.0 118	484 319.1

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:
 - o maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;
 - o 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;