



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

## State of Florida Department of Environmental Protection Notice of Permit

In the matter of an  
Application for Permit by:

DEP File No. AC 01-265409  
PSD-FL-153A  
Alachua County

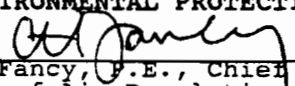
Mr. Gary V. Bishop, Plant Manager  
Metal Container Corporation  
5909 Northwest 18th Drive  
Gainesville, Florida 32606

Enclosed is Permit Number AC 01-265409 (PSD-FL-153A) for the modification of the Gainesville Lid Plant. The modification consists of a switch to a new sealant used to attach lids to aluminum cans. Allowable emissions of volatile organic compounds will be reduced to 319 tons per year (TPY) from present limit of 484 TPY by use of low volatility solvents, coatings, and sealants. The new sealant is less toxic and less is required due to a trend toward smaller lids. The facility is located in Gainesville, Alachua County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 14 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

### STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

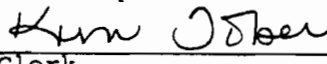
  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
904-488-1344

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed by certified mail before the close of business on 8-24-95 to the listed persons.

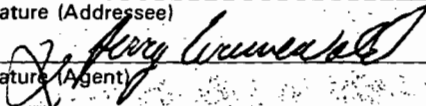
Clerk Stamp

**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.

  
Clerk Kim Ober 8-24-95  
Date

Copies furnished to:  
Robert Lanham, MCC  
Pat Reynolds, NEDB  
Robert Leetch, NED  
Jeff Meling, P.E., ECT

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Gary V. Bishop, Plant Mgr Metal Container Corp 5909-NW 18th Dr Gainesville, FL 32606		4a. Article Number Z 392 979 028	
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
5. Signature (Addressee) 		7. Date of Delivery 8/26/95	
6. Signature (Agent)		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

PS Form 3811, December 1991    \*U.S. GPO: 1993-352-714    **DOMESTIC RETURN RECEIPT**

Z 392 979 028



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

PS Form 3800, March 1993

Sent to	Gary Bishop
Street and No.	Metal Container
City, State and ZIP Code	Gainesville, FL
Postage	\$
Certified Fee	---
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	8-24-95
AC01-265409	
PSO-FI-153A	

Final Determination

Metal Container Corporation  
Gainesville, Florida

Gainesville Lid Plant  
Permit No. AC 01-265409  
PSD-FL-153A

Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

August 16, 1995

## FINAL DETERMINATION

Metal Container Corporation's application for a permit to modify the Lid Center Plant at their facility in Gainesville, Alachua County, Florida has been reviewed by the Bureau of Air Regulation in Tallahassee.

The Technical Evaluation and Preliminary Determination for the permit to modify the Lid Center facility in Gainesville, Florida, was distributed on July 6, 1995. The Notice of the Intent to Issue was published in The Gainesville Sun on July 11, 1995. Copies of the evaluation were available for inspection at the Department's offices in Jacksonville, Gainesville and Tallahassee.

Comments regarding the Technical Evaluation and Preliminary Determination and Specific Conditions of the permit were submitted by Mr. Robert M. Lanham, P.E. Manager, Environmental Engineering of Metal Container Corporation. The Bureau has considered Mr. Lanham's comments and has agreed to the changes he proposed. Specific Conditions Nos. 5, 9 and 17 will be changed as follows:

DEP PERMIT NUMBER AC 01-265409, PSD-FL-153A.

### **SPECIFIC CONDITION No. 5:**

#### **FROM:**

5. The permitted materials and utilization rates are as stated in the application. These rates include the following:

- A maximum annual production of 10.047 billion lids.
- A maximum annual usage of end sealant compound, tab lube, and clean up solvents of 168,027 gallons during any consecutive 12 month period.
- A maximum usage rate (all coatings and solvents) of 0.019 gallons/1000 lids.

#### **TO:**

5. The permitted materials and utilization rates are as stated in the application. These rates include the following:

- A maximum annual production of 10.049 billion lids.
- A maximum usage rate (all coatings and solvents) of 0.019 gallons/1000 lids.

**SPECIFIC CONDITION No. 9:**

FROM:

9. The permittee shall maintain a record of the clean up solvents used on a six month basis. A composite sample of the VOC content in the waste solvents shall be established every six months using Method 24 or 24A as contained in 40 CFR 60, and adopted by reference in Chapter 62-297, F.A.C.

TO:

9. The permittee shall maintain a record of the clean-up solvents used on a six month basis.

**SPECIFIC CONDITION No. 17**

FROM:

17. Pursuant to Rule 62-210.300(2), F.A.C., Air Operating Permits, the permittee shall be required to submit annual reports on the actual operation and emissions of the facility. Material balance reports are required to determine compliance with the emission limits in this permit and shall be sent to the Northeast District office to confirm emissions and update area-wide VOC emissions inventories. The quantity of lids processed per module shall be included in the report. At a minimum, this report shall also include VOC emission limits [lb/hr (monthly average)], [lb/day (monthly average)], [lb/month, (ton/yr)], manufacturer's certification of VOC content of coating, coating usage records, hours of operation, and test results.

TO:

17. Pursuant to Rule 62-210.300(2), F.A.C., Air Operating Permits, the permittee shall be required to submit annual reports on the actual operation and emissions of the facility. Material balance reports are required to determine compliance with the emission limits in this permit and shall be sent to the Northeast District office to confirm emissions and update area-wide VOC emissions inventories. **The quantity of lids processed by the facility shall be included in the report.** At a minimum, this report shall also include VOC emission limits [lb/hr (monthly average)], [lb/day (monthly average)], [lb/month, (ton/yr)], manufacturer's certification of VOC content of coating, coating usage records, hours of operation, and test results.

The final action of the Department is to issue construction permit AC01-265409 (PSD-F1-153A) with the changes noted above.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

**PERMITTEE:**  
**Metal Container Corp.**  
**4102 Main Street**  
**Lakeland, FL 33801**

**Permit Number: AC01-265409**  
**PSD-FL-153A**  
**Expiration Date: July 30, 1996**  
**County: Alachua**  
**Latitude/Longitude: 29°42'5"**  
**82°20'53"**  
**Project: Lid Center Facility**

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.); Chapters 62-210 through 62-297 and 62-4, Florida Administrative Code (F.A.C.); and, 40 CFR 52.21 and 60. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

For the modification of the Lid Center (Modules 4 through 7) at the Metal Container Corp. facility in Gainesville, Alachua County, Florida. The UTM coordinates are Zone 17, 369.38 km and 3287.23 N.

The source shall be constructed/installed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DEP Form 62-210.900(1), received on February 15, 1995.
2. Department's letter dated March 10, 1995.
3. Metal Container Corporation's letter dated March 20, 1995.
4. Department's letter dated May 9, 1995.
5. Metal Container Corporation's letter dated May 12, 1995.
6. Environmental Consulting & Technology's letter dated May 22, 1995.

**PERMITTEE:**  
Metal Container Corp.

**Permit Number:** AC01-265409  
PSD-FL-153A  
**Expiration Date:** July 30, 1996

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:  
Metal Container Corp.

Permit Number: AC01-265409  
PSD-FL-153A  
Expiration Date: July 30, 1996

**GENERAL CONDITIONS:**

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.



PERMITTEE:  
Metal Container Corp.

Permit Number: AC01-265409  
PSD-FL-153A  
Expiration Date: July 30, 1996

**GENERAL CONDITIONS:**

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes;

- (X) Determination of Best Available Control Technology (BACT)
- (X) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;

PERMITTEE:  
Metal Container Corp.

Permit Number: AC01-265409  
PSD-FL-153A  
Expiration Date: July 30, 1996

**GENERAL CONDITIONS:**

- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. The maximum VOC content of the coating and solvents used in this operation shall not exceed the following limits.

<u>Material</u>	<u>lbs VOC/Gallon</u>
End Sealant	3.5 (excluding water)
Tab Lube	6.0 (excluding water)
Mineral Spirits	6.32
Heptane	5.84

2. The ambient reference concentrations (ARC) levels for the following pollutants shall not be exceeded:

<u>Pollutant</u>	<u>Ambient Reference Concentrations (ug/m<sup>3</sup>)</u>		
	<u>8-hr</u>	<u>24-hr</u>	<u>Annual</u>
n-hexane	1,760	419	200
toluene	1,880	448	400
benzene	30	7	0.12
odor	none objectionable		

3. The total permitted VOC emissions from coatings and organic solvents at this facility shall not exceed 78 lbs/hr and 319 tons/yr.

Operating Requirements

4. This facility is allowed to operate continuously (8760 hours per year).

PERMITTEE:  
Metal Container Corp.

Permit Number: AC01-265409  
PSD-FL-153A  
Expiration Date: July 30, 1996

**SPECIFIC CONDITIONS:**

5. The permitted materials and utilization rates are as stated in the application. These rates include the following:

- A maximum annual production of 10.049 billion lids.
- A maximum usage rate (all coatings and solvents) of 0.019 gallons/1000 lids.

6. Any other operating parameter established during compliance testing and/or inspection that will confirm the proper operation of this facility shall be included in the operating permit.

Compliance Determination

7. The permittee shall provide the Department with a determination of the VOC content of each coating using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A. The enclosed Appendix B (EPA 450/3-84-019), if properly completed for each affected coating, may be submitted in lieu of the Method 24 or 24A tests. New coating or a similar coating supplied by a different manufacturer shall be tested for VOC content using EPA Method 24 and 24A or the above mentioned Appendix B prior to initial use in production. Each coating shall be tested after it is diluted with the maximum amount of solvent used by the permittee for production. The use of a different coating with a higher than permitted VOC content or BACT limit is not allowed. Prior written notification is required in the event that the VOC content of a coating (not included in the application) increases above that of the previous coating in use. Material Safety and Data Sheets shall be maintained for all materials that are used. Notification shall be provided to the Northeast District office and shall include EPA Method 24 or Appendix B test results on the VOC content of the proposed coating and solvent. Testing procedures shall be consistent with applicable provisions of Chapter 62-297.

8. Compliance with the ambient reference concentrations shall be demonstrated based on calculations certified by a Professional Engineer registered in Florida using actual operating conditions. Determination of the ambient concentration for chemical organic compounds shall be determined by Department approved dispersion modeling calculations. These calculations shall be available upon request by the Department.

9. The permittee shall maintain a record of the clean-up solvents used on a six month basis.

PERMITTEE:  
Metal Container Corp.

Permit Number: AC01-265409  
PSD-FL-153A  
Expiration Date: July 30, 1996

**SPECIFIC CONDITIONS:**

10. The permittee shall maintain accurate records of all coatings and solvents used at the facility for at least a two year period.
11. The permittee shall notify the Northeast District office in writing at least 15 days prior to any emissions testing performed by the permittee. The period prior to testing shall not exceed 180 days after construction is completed. Compliance test results shall be submitted to the Northeast District 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 62-296, 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.

Rule Requirements

13. This facility shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapters 62-4 and 62-210 through 297, Florida Administrative Code.
14. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state or local permitting requirements and regulations (Rule 62-210.300(1), F.A.C.).
15. According to Rule 62-296.320(1)(a, F.A.C., no person shall store, pump, handle, process, load, unload, or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Currently, there are no control strategies associated with this operation other than good operating practices to minimize pollutant emissions. At a minimum, the following procedures shall be followed to minimize pollutant emissions:
  - 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;

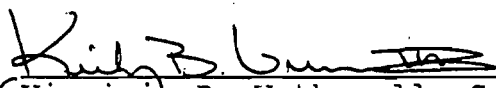
PERMITTEE:  
Metal Container Corp.

Permit Number: AC01-265409  
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Expiration Date: July 30, 1996

**SPECIFIC CONDITIONS:**

- o All fittings, valves, lines, etc., shall be properly maintained; and,
  - o All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.,
16. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to Rule 62-296.320(2), F.A.C.
17. Pursuant to Rule 62-210.300(2), F.A.C., Air Operating Permits, the permittee shall be required to submit annual reports on the actual operation and emissions of the facility. Material balance reports are required to determine compliance with the emission limits in this permit and shall be sent to the Northeast District office to confirm emissions and update area-wide VOC emissions inventories. The quantity of lids processed by the facility shall be included in the report. At a minimum, this report shall also include VOC emission limits [lb/hr (monthly average)], [lb/day (monthly average)], [lb/month, (ton/yr)], manufacturer's certification of VOC content of coating, coating usage records, hours of operation, and test results.
18. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).
19. An application for an operation permit or a Title V operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (Rules 62-4.055 and 62-4.220, F.A.C.).

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
For Virginia B. Wetherell, Secretary

Revised Best Available Control Technology (BACT) Determination  
Metal Container Corporation  
Alachua County

The applicant intends to modify an aluminum lid manufacturing facility in Gainesville, Florida by changing the hexane based end sealant compound with a heptane based compound. The modernization project accomplished in 1992 resulted in an increase in the facility's annual production capacity, from an existing 6.528 billion lids to 10.047 billion lids.

VOC emissions will be minimized through the use of low-solvent, high solids compounds.

In accordance with Rule 62-212.400(2)(f)(3) of the Florida Administrative Code (F.A.C.) a BACT review for volatile organic compounds (VOC) is required since the potential emissions increase exceeds the significant emission rate of 40 tons per year.

BACT Determination Requested by the Applicant:

The BACT determination requested by the applicant is based on the use of high solid/low VOC end sealant. The VOC content for the end sealant and other compounds proposed for use at the facility is given below:

<u>Compound</u>	<u>VOC Content (weight fraction)</u>
End Sealant	0.417
Tab Lube	0.945
Solvents	1.0

Date of Receipt of BACT Application:

February 15, 1995

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 62-212, Air Pollution, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case-by-case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of

Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Analysis:

A review of the BACT/LAER Clearinghouse indicates that BACT for lid manufacturing (total of two determinations) has been based on limiting the VOC content of the end sealant compound.

The first determination, made January 10, 1986, showed that BACT for a modified source was the use of an end sealant compound with a VOC content of 4.2 pounds/gallon minus water. The second, issued January 21, 1988, determined that BACT for a new source was the use of an end sealant compound with a VOC content of 3.7 pounds/gallon. These determinations are less stringent than that proposed by the applicant as being BACT for this project (VOC content equals 3.5 pounds/gallon). Originally, the BACT determination done in 1991 for this facility set a VOC limit of 3.2 pounds/gallon. Although this limit is being relaxed, it is important to note that the new end sealant compound proposed, DAREX SLC 4357NP-57.5, a heptane-based compound, will replace the compound currently in use, DAREX S9357 MHV, a hexane-based compound. Hexane compounds are considered hazardous air pollutants (HAPs). Therefore emissions of a HAP will be traded for those of a much less toxic, non-HAP.

In accordance with the "top-down" BACT procedure the applicant has evaluated two control technologies which would further reduce VOC emissions. The two technologies are:

1. The use of non-VOC (water-base) end sealant compounds.
2. Collection and destruction of VOC emissions through the use of an incinerator.

Both of these technologies were considered during the 1991 BACT review and were reconsidered in the present review. A summary of this review follows:

Water-Based End Sealant:

The applicant has indicated that there are both operational and technical difficulties associated with the use of water-based end sealant compound.

According to the applicant, water-based end sealant compound requires a longer curing time. In order to reduce the curing time, drying ovens must be added to drive off the water.

Additional equipment would be required if water-base sealant was used. Lid dryers, tankage, piping, instrumentation, and conveying equipment would be the minimum additional equipment required.

The applicant has indicated that the total levelized annual cost (operating plus amortized capital cost) to install and operate the additional equipment needed to utilize water-base end sealant compound would be approximately \$1.43 million. When this cost is taken into consideration with the annual VOC reductions that would be realized by using water-base end sealant compound (251 tons per year) the cost per ton of controlling VOC would be \$5,700.

This cost (\$5,700/ton) is not representative of costs that have been previously justified as BACT and is judged not to be cost effective for this facility.

Incineration:

Incineration is a commonly used method to control the emissions of VOC from various processes that utilize VOC-containing compounds. Emission reductions are achieved through this method by capturing the VOC which are "flashed-off" during the manufacturing process and conveying them to an incinerator.

The applicant has stated that the lid manufacturing process does not lend itself to the capture of VOC due to the nature of the compounds used and the speed at which the ends pass through the lines. However, the applicant originally assumed that the largest reductions could be achieved by ducting the scrap cyclones (VOC from tab lube) and the end liner and balancers (VOC from end sealant) to the thermal oxidizer. As such it was conceptually estimated that 65% of the VOC from these materials can be captured and ducted to a thermal oxidizer with a 90% destruction efficiency.

Subsequent to the original proposal, the applicant obtained additional technical information that invalidated assumptions made in the conceptual design of the thermal oxidation system control alternative as proposed above.



The applicant has indicated that due to the fugitive nature of the end sealant compound (heavier than air) and the slow evaporation rate of the tab lube, the system, as proposed, will not capture an appreciable amount of VOC emissions. It is estimated that 80% of the end sealant compound emissions will occur after the lining operation as fugitive emissions.

According to the applicant, the only method to ensure capture of significant quantities of emissions for incineration would be to fully enclose each of the liners and associated conveyors and balancers. This would lead to a loss of production due to the operational and maintenance inefficiencies associated with the enclosure and equipment required for the thermal oxidation system.

Regarding tab lube VOC emissions, the applicant has performed several evaporation tests. Based on the extremely low vapor pressure, and the fact that the scrap has a 30 second residence time in the cyclone system, it has been concluded that capture and incineration of the tab lube emissions is not a technically feasible means of control. Tab lube emissions will be minimized by the use of pre-lubricated tab stock.

The applicant has indicated that the total levelized annual cost to install and operate the additional equipment needed to capture and incinerator VOC emissions would, assuming 95% destruction in the incinerator, be approximately over \$1.57 million. When this cost is taken into consideration with the annual VOC reduction that would be realized by using the thermal oxidation system (95 tons per year), the cost per ton of controlling VOC would be over \$16,500. This cost is not representative of costs that have been previously justified as BACT and is judged to be cost prohibitive for this facility.

Environmental Impact Analysis:

In addition to the bulk VOC control that could be achieved by using either water-based end sealant or thermal oxidation, such control would also reduce the amount of potential toxic emissions. The type and quantity of air toxics that are expected from the use of the proposed end sealant are given as follows:

<u>Air Toxic</u>	<u>pounds/hr</u>	<u>tons/yr</u>
n-hexane	0.2	0.8
n-heptane	33.8	138.9
cyclohexane	25.0	102.5
toluene	0.1	0.5
benzene	<0.001	<0.01

A review of the maximum impacts expected from these air toxics indicates that the use of the proposed end sealant, without additional control, results in ambient levels which are less than the Ambient Reference Concentrations.

BACT Determination by DEP:

The information presented by the applicant indicates that the use of high solid/low VOC end sealant still represents BACT for the proposed facility. Although the use of water-based end sealant would provide the greatest VOC control, the resulting cost to control VOC (\$5,700/ton) is judged to be too costly. The next level of control (thermal oxidation) was judged to be even more expensive.

A comparison of the economics and technical viability of the alternate technologies, and review of recent BACT/LAER determinations, show that the use of high solids/low VOC end sealant compounds, and the use of pre-lubricated tab stock to minimize tab lube usage, is BACT for the proposed lid plant modernization.

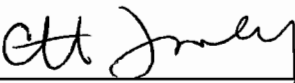
Conclusion:

Based on the discussion presented in this analysis, BACT for the Metal Container Corporation is represented by controlling the solvent content of the end sealant not to exceed 3.5 pounds VOC per gallon of sealant excluding water and by using pre-lubricated tab stock to minimize tab lube usage.

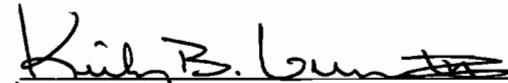
Details of the Analysis may be Obtained by Contacting:

Administrator, New Source Review Section  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended by:

  
\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
August 18 1995  
Date

Approved by:

  
\_\_\_\_\_  
for Virginia B. Wetherell, Secretary  
Dept. of Environmental Protection  
23 August 1995  
Date

Memorandum

Florida Department of  
Environmental Protection

---

TO: Virginia B. Wetherell  
THROUGH: Dan Thompson *DT*  
FROM: Howard L. Rhodes *HR*  
DATE: August 18, 1995  
SUBJECT: Approval of Construction Permit PSD-Fl-153A and  
AC 01-265409, Metal Container Corporation  
Gainesville, Alachua County, Florida

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to modify the Gainesville Lid Plant.

The modification involves a new sealant used in attaching lids to aluminum cans. Allowable emissions of volatile organic compounds will be reduced to 319 tons per year (TPY) from the present limit of 484 TPY by use of low volatility solvents, coatings, and sealants. The new sealant is less toxic and less is required due to a trend toward smaller lids.

The original Intent to Issue was published in the Gainesville Sun on July 11, 1995. Some modifications were made in response to comments by Metal Container Corporation.

This permit is not controversial. I recommend your approval and signature.

HLR/th/t



**Metal Container  
Corporation**

ONE OF THE ANHEUSER-BUSCH COMPANIES

August 3, 1995

Ms. Teresa Heron  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Mail Stop #5500  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

AUG 9 1995

Bureau of  
Air Regulation

Re: Metal Container Corporation - Gainesville Lid Plant  
Permit Number AC01-265409

Dear Ms. Heron:

Thank you for the opportunity to meet with you and Al Linero yesterday to discuss the proposed permit for MCC. Listed below are the specific changes we discussed and would request in the permit prior to issuance.

**Specific Condition #5:**

The second bullet point in this condition should be deleted, it is not necessary to include an annual usage limit if a production limit is set. The second condition was not included in the first draft and in fact was only included at our request when it was believed that a production limit was not necessary. The new condition should read:

***"5. The permitted materials and utilization rates are as stated in the application. These rates include the following:***

- *A maximum annual production of 10.049 billion lids.*
- *A maximum usage rate (all coatings and solvents) of 0.019 gallons/1000 lids."*

**Specific condition #9:**

The second sentence of this condition should be deleted in it's entirety. The reason for this change is that MCC no longer takes credit for any VOC shipped off-site as waste and therefore this condition is no longer necessary. MCC now uses a more conservative estimate in that all solvents used are considered to be lost. This change is due to the fact that a recycling program has been instituted and the quantity of waste generated will be greatly reduced. Furthermore, changes in clean-up methodology have also reduced the quantities of solvents used. The new condition should read:

***"9. The permittee shall maintain a record of the clean-up solvents used on a six month basis."***

Metal Container Corporation  
3636 South Geyer Road  
Suite 400  
St. Louis, MO 63127-1218

**Specific Condition #17**

The third sentence of this condition references production by modules. All other references to modules has been deleted from this permit. As we discussed, it is extremely difficult and also unnecessary to track production in this manner. The sentence currently reads:

" The quantity of lids processed per module shall be included in the report."

it should be changed to read:

***" The quantity of lids processed by the facility shall be included in the report."***

We appreciate your assistance in this matter and as discussed anything that can be done to expedite the issuance of the final permit will be greatly appreciated. If you have any questions regarding this request, please call me at (314) 957-0769.

Sincerely,

METAL CONTAINER CORPORATION



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

cc: A. A. Linero - FDEP  
J. Meling - ECT



**Metal Container  
Corporation**

ONE OF THE ANHEUSER-BUSCH COMPANIES

July 14, 1995

Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: METAL CONTAINER CORPORATION  
JACKSONVILLE, FLORIDA  
SEMI-ANNUAL COMPLIANCE STATEMENT  
FACILITY ID #31DVL160097**

RECEIVED  
AUG 8 1995  
Bureau of  
Air Regulation

Dear Director:

This letter provides semi-annual reporting as required under 40CFR 60.495(b) for the period 1/1/95 - 6/30/95. During the aforementioned period, Metal Container Corporation's Jacksonville can plant used only coatings which directly complied with federal New Source Performance Standards for VOC content, as specified in 40 CFR 60.492.

Please contact me at (314)957-0714 or Bob Lanham at (314)957-0769 if you have any questions or need additional information.

Sincerely,



Anna C. Nabb

cc: R. Lanham  
G. Patts

c:\admin\subww

Metal Container Corporation  
3636 South Geyer Road  
Suite 400  
St. Louis, MO 63127-1218



**Environmental Consulting & Technology, Inc.**

July 18, 1995  
ECT No. 94273-0200

**RECEIVED**  
JUL 19 1995

Bureau of  
Air Regulation

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

Re: Metal Container Corporation, Gainesville, Florida  
FDEP File No. AC 01-265409, PSD-FL-153A  
Proof of Publication

Dear Mr. Fancy:

Enclosed is the referenced proof of publication for the "Notice of Intent to Issue Permit" received by Metal Container.

Thank you for your attention to this matter.

Sincerely,

**ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.**

Jeffrey L. Meling, P.E.  
Principal Engineer

JLM/edd

Enclosure

cc: D. Pusch, A-BC, w/encl.  
R. Lanham, MCC, w/encl.

3701 Northwest  
98<sup>th</sup> Street  
Gainesville, FL  
32606

(904)  
332-0444

FAX (904)  
332-6722

G-AB95.9/JLM0718.1

cc: J. Neron  
C. Helladay  
NE District

STATE OF FLORIDA  
COUNTY OF ALACHUA

Before the undersigned authority personally appeared Naomi Williams Jordan

who on oath says that he/she is Assistant Classified Mgr. of THE GAINESVILLE SUN, a daily newspaper published at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a Notice of Intent

in the matter of .....

in the..... Court, was published in said newspaper in the issue of, ..  
.....July 11,..... 1995.....

Affiant further says that the said THE GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said Alachua County, each day, and has been entered as second class mail matter at the post office in Gainesville, in said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount for publication in the said newspaper.

Sworn to and subscribed before me this

11 day of July, D. 1995  
Martha A. Pattison  
(Seal) Notary Public



Naomi Williams - Jordan

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT  
AC 01-265409  
PSD-FL-153A

The Department of Environmental Protection gives notice of its intent to issue a construction permit, No. AC 01-265409, to Metal Container Corporation, 5909 Northwest 18th Drive, Gainesville, Alachua County, Florida 32606, for the modification of their Gainesville Lid plant. This modification consists of switching to a new sealant used to attach lids to aluminum cans. Allowable emissions of volatile organic compounds per use reduced to 319 tons per year (TPY) from present limit of 484 TPY by use of low volatility solvent coatings and sealants. The new sealant is less toxic and less required due to a trend toward smaller lids.

A person whose substantial interests are affected by the Department's proposed permitting action may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32309, within 14 days of publication of this Notice. Petitioners shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any such person's right to request an administrative determination (hearing) under Section 120.57, F.S.

The Petitioner shall contain the following information: (a) The name, address, and telephone number of each petitioner; (b) the Department Permit File number and the County in which the project is proposed; (c) A statement of how and when each petitioner received notice of the Department's action or proposed action; (d) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (e) A statement of facts why the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

Further, a public hearing can be requested by any person whose request must be submitted within 30 days of this Notice.  
(9924) 7:11

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 action taken by it in this Notice. Petitioners whose substantial interests may be affected by any decision of the Department with regard to the 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 publication of this Notice in the Office of General Counsel at the above address of the Department. Failure to file a 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 in this proceeding. Any subsequent intervention will only be at the option of the presiding officer upon motion filed pursuant to Rule 28.5, 207, Florida Administrative Code.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at: Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301

Department of Environmental Protection, Northeast District, 7825 Baymeadows Way, Suite 200B Jacksonville, Florida 32256-7577

Department of Environmental Protection, Northeast District Branch, 5700 Southwest 34th Street, Suite 204 Gainesville, Florida 32605

Any person may send written comments on the proposed action to Administrator, New Source Review at the Department of Environmental Protection, Bureau of Air Regulation, M. Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32309-2000. All comments received within 30 days of the publication of this Notice will be considered in the Department's final determination.





# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July 5, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

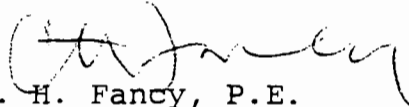
Mr. Gary V. Bishop, Plant Manager  
Metal Container Corporation  
5909 Northwest 18th Drive  
Gainesville, Florida 32606

Dear Mr. Bishop:

Attached is a copy of the Technical Evaluation and Preliminary Determination, proposed BACT determination, and proposed permit to construct/modify the Gainesville Lid Plant. Also included is the Intent to Issue as well as the Notice of Intent to Issue for you to publish.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero of the Bureau of Air Regulation. If you have any questions regarding this matter, please call Teresa Heron at (904)488-1344.

Sincerely,

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

CHF/TH/t

Attachments

cc: Dean E. Pusch, MCC  
Robert Leetch, NED  
Pat Reynolds, NEDB  
Jeff Meling, P.E., ECT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

DEP File No. AC 01-265409  
PSD-FL-153A

Mr. Gary V. Bishop, Plant Manager  
Metal Container Corporation  
5909 Northwest 18th Drive  
Gainesville, Florida 32606

---

INTENT TO ISSUE

The Department of Environmental Protection hereby gives notice of its intent to issue a construction permit (copy attached) for the proposed project, as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Metal Container Corporation, applied on February 15, 1995 to the Department of Environmental Regulation for a permit to construct/modify the Gainesville Lid Plant.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed action.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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

The Petition shall contain the following information;

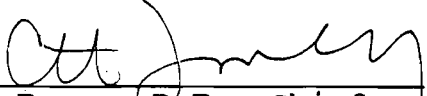
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c)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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

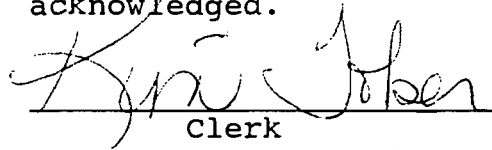
  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
904-488-1344

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 7-6-95 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.

  
Clerk 7-6-95  
Date

Copies furnished to:

Dean E. Pusch, MCC  
Robert Leetch, NED  
Pat Reynolds, NEDB  
Jeff Meling, P.E., ECT

Z 392 979 042



**Receipt for  
Certified Mail**

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

PS Form 3800, March 1993

Sent to <i>Gary Bishop</i>	
Street and No. <i>Metal Container</i>	
P.O. State and ZIP Code <i>Gainesville, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>AC 01-265409 7-6-95</i> <i>PSD-FL-153A</i>	

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT

AC 01-265409  
PSD-FL-153A

The Department of Environmental Protection gives notice of its intent to issue a construction permit, No. AC 01-265409, to Metal Container Corporation, 5909 Northwest 18th Drive, Gainesville, Alachua County, Florida 32606 for the modification of their Gainesville Lid plant. The modification consists of a switch to a new sealant used to attach lids to aluminum cans. Allowable emissions of volatile organic compounds will be reduced to 319 tons per year (TPY) from present limit of 484 TPY by use of low volatility solvents, coatings, and sealants. The new sealant is less toxic and less is required due to a trend toward smaller lids.

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

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (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 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 Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 publication of this notice 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.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7577

Department of Environmental Protection  
Northeast District Branch Office  
5700 Southwest 34th Street, Suite 204  
Gainesville, Florida 32605

Any person may send written comments on the proposed action to Administrator, New Source Review at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such request must be submitted within 30 days of this notice.

Technical Evaluation  
and  
Preliminary Determination

Metal Container Corporation  
Gainesville, Alachua County, Florida

Permit No. AC 01-265409  
PSD-FL-153A  
Gainesville Lid Plant

Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

June 30, 1995



SYNOPSIS OF APPLICATION

I. FACILITY INFORMATION

I.1 Applicant Name and Address

Metal Container Corporation  
5909 Northwest 18th Drive  
Gainesville, Florida 32606

I.2 Reviewing and Process Schedule

Date of Receipt of Application: February 15, 1995.

Application Completeness Reviews: Department's letters dated March 10, and May 9, 1995.

Responses to Incompleteness Letters: Company's letters dated March 20, May 12 and May 22, 1995.

I.3 Facility Location

Metal Container Corporation is located at 5909 N.W. 18th Drive in Gainesville, Alachua County, Florida. The UTM coordinates are Zone 17, 369.38 km East and 3287.23 km North.

I.4 Standard Industrial Classification Code (SIC)

This facility is classified as follows:

Major Group No. 34 - Fabricated Metal Products, Except Machinery and Transportation Equipment

Group No. 341 - Metal Can and Shipping Containers

Industry No. 3411 - Metal Cans

I.5 Facility Category

Metal Container Corporation (MCC) is classified as a major emitting facility for volatile organic compounds (VOC). Allowable emissions of VOC were 484 TPY in 1994. The proposed project will decrease total allowable VOC emissions by 165 TPY. Actual volatile organic emissions for this facility will increase by 70.4 tons per year. Total permitted emissions for this facility after the proposed project will not exceed 319 TPY.

## II. PROCESS DESCRIPTION

Major steps in this process are as follows:

Aluminum stock is stamped into lids (shells) by the shell presses. The rims of these shells are curled in the presses, and end sealant is applied in the curl by the liners. The lids are "finished" by the conversion presses which emboss the lids, score the openings, and fabricate and attach the tabs. Figure 1 shows the basic process flow diagram. Material inputs (Items 1 through 5 in Figure 1) are shell stock, tab stock, end sealant compound, tab lube, and cleanup solvents, respectively. 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.

## III. PERMITTING CHRONOLOGY

On June 28, 1991, Florida Construction Permits AC 01-185835 and PSD-FL-153 were issued to Metal Container Corporation to modernize its Gainesville Lid Center (Table I). This modernization increased the facility's annual shell press production capacity to 10.047 billion lids from 6.528 billion lids. It also consolidated all previous state air permitting actions into a single federally-enforceable permit. All equipment previously assigned to Modules 1-4 was either retired or reallocated to Modules 4-7. New equipment was also assigned to Modules 4-7.

The modernization project consisted of:

- 1) The removal of all existing shell presses and conversion presses with the exception of:
  - a) The shell press, two conversion presses, and two liners previously permitted as Module 4,
  - b) The shell press, three conversion presses, and three liners previously permitted as Module 6,
  - c) The six remaining existing liners.
- 2) The addition of the following new equipment:
  - a) Two shell presses,
  - b) Seven conversion presses,
  - c) Three liners, and
  - d) A shell press scrap cyclone, and
  - e) Supporting equipment (e.g., balancers and baggers).

Permitted annual VOC emissions for the whole facility are 484 TPY.

In 1994, MCC requested to revise permits AC01-185835 and PSD-FL-153 to allow temporary use of a new end sealant compound to meet revised customer specifications.

The new sealant was a hexane-based compound which did not increase VOC emissions but raised concerns since hexane is a hazardous air pollutant (HAP). The permit was revised to reflect the use of the new compound. However, the HAPs emissions and ground level concentrations were evaluated to insure compliance with the Department's Ambient Reference Concentrations for hexane, toluene, and benzene. Permitted VOC emissions remained at 484 TPY.

In early 1995, MCC applied for this new modification of permits AC01-185835 and PSD-FL-153 to allow the use of a better end sealant with much less hexane compounds. Although the sealant results in emissions of less HAPs, it results in an actual increase of VOC emissions. However the permitted VOC emissions limit will be reduced from 484 TPY to 319 TPY. New permit numbers, AC01-265409 and PSD-FL-153A are assigned to the present modification project.

#### IV. PROJECT DESCRIPTION

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. The new 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, actual emissions from the end liners will increase based on the fact that the VOC content of the compound will increase from 3.2 lb/gal to 3.5 lb/gal. As future production increases to previously authorized levels, VOC emissions will be substantially less than allowed by earlier permits. This will occur as a result of the trend and company plans toward smaller lid sizes, the use of pre-lubricated tab stock, and a reduction on the use of mineral spirits due to substitution with mineral oil in most cases.

During the ongoing company modernization project (1991 to 1994), the new equipment has been integrated and placed into operation to implement production of smaller lids which obviously require less aluminum, coatings, sealants and solvents. 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. The emission limits in the current operating permit are based on the use of 0.0169 gallons of end sealant per 1,000 lids (gal/1,000 lids).

Sealant usage rates for the smaller (i.e., 204) lids are approximately 20 percent less which will allow for a reduction in potential emissions despite the immediate increase in actual emissions.

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 a hazardous air pollutant (HAP), while cyclohexane is not. Therefore, emission of a HAP will be traded for those of a much less toxic, non-HAP, providing an obvious net environmental benefit.

A gradual change to pre-lubricated tab stock began, reducing the requirements for tab lube while 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.

As a result of the foregoing, the permitted VOC emission limit will be reduced from 484 TPY to 319 TPY.

#### V. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 62-209 through 62-297 and 62-4.

Metal Container Corporation (MCC) is located in an area (Alachua County) currently designated as being in attainment for all criteria pollutants, F.A.C. Rule 62-275.400.

MCC is a major emitting facility for volatile organic compounds (VOC) as defined in F.A.C. Rule 62-212.200(42). Total permitted emissions of VOC for the entire facility after the proposed project, shall not exceed 319 TPY.

The proposed project, a modification to the lid manufacturing process, was reviewed under F.A.C. Rule 62-212.400, Prevention of a Significant Deterioration, which required the use of Best Available Control Technology (BACT) and an air quality analysis. The proposed project, increasing the facility's actual emissions by 70.4 VOC TPY, is considered under PSD regulations, a major modification to a major facility. The BACT determination will be revised to reflect current limits. The proposed modification will result in a relaxation of the existing permit limitation for an end sealant compound limit of 3.2 lb/gal VOC less water. The proposed new permit limit is 3.5 lb/gal VOC less water.

The proposed facility shall comply with Rule 62-210, F.A.C., General Pollutant Emission Limiting Standards; Rule 62-212, F.A.C., PSD regulations; and Rule 62-297, F.A.C., Stationary Point Source Emission Test Procedures.

## VI. SOURCE IMPACT ANALYSIS

### VI.1 Emission Limitations

The operation of this facility will produce emissions of volatile organic compound (VOC). These emissions occur from the use of end sealant compound, tab lube and clean-up solvents.

The chemical products used in this process are listed in material safety data sheets (MSDS) as containing n-heptane, n-hexane, cyclohexane, toluene, and benzene. These compounds and the amount emitted are listed in Table II.

The permitted emissions for the entire facility shall not exceed 78 lbs VOC/hour. Although this equates to 341.6 tons VOC/year, the applicant has agreed to a limitation of 319 tons VOC/year.

Table III summarizes the proposed VOC emissions at the facility.

### VI.2 Air Quality Analysis

Even though the proposed project is subject to PSD because the actual VOC emissions increase is greater than 40 TPY, no air quality analysis is required for this project since the VOC increase is less than 100 TPY.

However, modeling was done to evaluate maximum impacts of the three HAPs n-hexane, toluene and benzene which will be emitted by this facility. These impacts are presented in the table below.

Each pollutant's maximum 8-hour, 24-hour and annual impact is compared to the Department's draft Ambient Reference Concentrations (ARC).

Proposed maximum emission rates of hexane, toluene and benzene are 0.2, 0.1, and 0.001 lbs/hr, respectively; these values were used as inputs in modeling analysis.

As shown in the table below, all predicted impacts are less than their respective ARC.

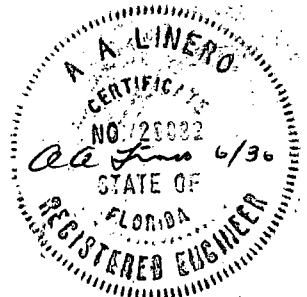
Pollutant	Maximum Predicted Concentration (ug/m <sup>3</sup> )			ARCs (ug/m <sup>3</sup> )		
	8-hr	24-hr	Annual	8-hr	24-hr	Annual
n-hexane	4.01	2.54	0.40	1760	419	200
Toluene	2.00	1.27	0.27	1880	448	400
Benzene	0.02	0.01	0.002	30	7	0.12

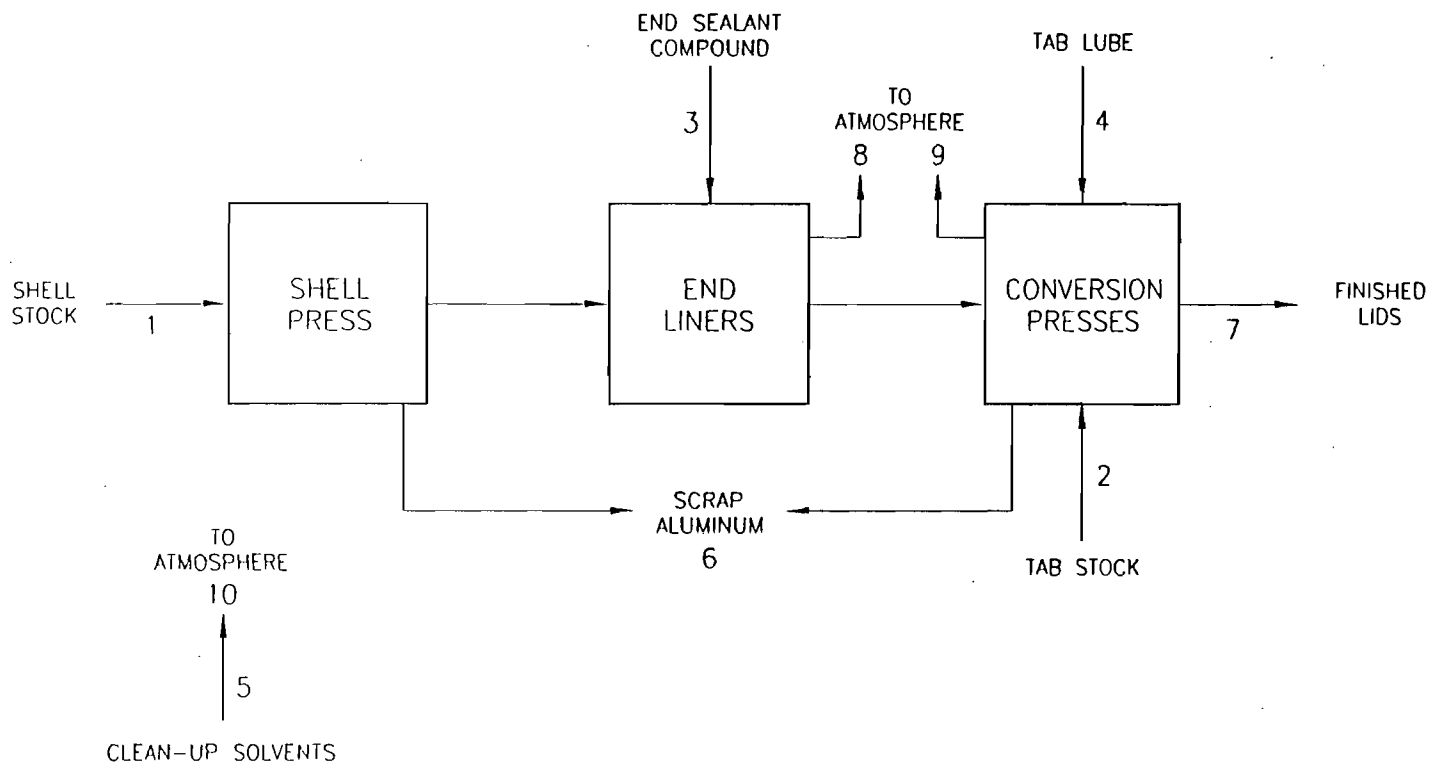
The information in the table above is based on results given by the EPA and Department approved Industrial Source Complex Short-Term (ISCST2) model, which was run with one year of meteorological data (Tallahassee surface and Waycross, Georgia upper air, 1986).

Since only one year of data was used, the highest predicted concentrations were compared to the ARC.

#### VII. CONCLUSION

Based on the information provided by Metal Container Corporation, the Department has reasonable assurance that the proposed installation, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 62-209 through 62-297 of the Florida Administrative Code.





ECT Number: 94273-0203  
 Last Update: 07/18/94  
 File: C:\ACAD\94273\ARFLOW

FIGURE 1.  
 PROCESS FLOW DIAGRAM, MODULES 4-7

Source: MCC, 1994.

**ECT**  
 Environmental Consulting & Technology, Inc.

Table I. 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.



Table II

## Comparison of Individual VOC Emissions: Before and After Proposed Modification

Pollutant	1991 Emissions Before Modification*		1995 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 of the application.

\*\*Includes heptane isomers.

Sources: MCC, 1995.  
ECT, 1995.

Note: Emissions of n-hexane will be almost entirely eliminated, as well as emissions of toluene and benzene. Cyclohexane emissions will also decrease by approximately 29 tons per year. Only emissions of n-heptane will increase by approximately 78.2 tons per year. 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.

Table III  
PROPOSED SUMMARY OF 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 spirts (cleanup solvent)	6.31	1.000	0.00007	10,047,000	2.2
<b>TOTAL</b>					<b>319.1</b>

\*Production of "206" lids.

+Production of "204" lids.

Sources: MCC, 1995.  
ECT, 1995.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

**PERMITTEE:**  
**Metal Container Corp.**  
**4102 Main Street**  
**Lakeland, FL 33801**

**Permit Number: AC01-265409**  
**Expiration Date: July 30, 1996**  
**County: Alachua**  
**Latitude/Longitude: 29°42'5"**  
**82°20'53"**  
**Project: Lid Center Facility**

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.); Chapters 62-210 through 62-297 and 62-4, Florida Administrative Code (F.A.C.); and, 40 CFR 52.21 and 60. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

For the construction/modification of the Lid Center (Modules 4 through 7) at Metal Container Corp. facility in Gainesville, Alachua County, Florida. The UTM coordinates are Zone 17, 369.38 km and 3287.23 N.

The source shall be constructed/installed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DEP Form 62-210.900(1), received on February 15, 1995.
2. Department's letter dated March 10, 1995.
3. Metal Container Corporation's letter dated March 20, 1995.
4. Department's letter dated May 9, 1995.
5. Metal Container Corporation's letter dated May 12, 1995
6. Environmental Consulting & Technology's letter dated May 22, 1995.

**PERMITTEE:**  
Metal Container Corp.

**Permit Number:** AC01-265409  
PSD-FL-153A  
**Expiration Date:** July 30, 1996

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

**PERMITTEE:**  
Metal Container Corp.

**Permit Number:** AC01-265409  
PSD-FL-153A  
**Expiration Date:** July 30, 1996

**GENERAL CONDITIONS:**

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:  
Metal Container Corp.

Permit Number: AC01-265409  
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**GENERAL CONDITIONS:**

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes;

- (X) Determination of Best Available Control Technology (BACT)
- (X) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;

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Metal Container Corp.

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**GENERAL CONDITIONS:**

- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. The maximum VOC content of the coating and solvents used in this operation shall not exceed the following limits.

3.5 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

2. The ambient reference concentrations (ARC) levels for the following pollutants shall not be exceeded:

Pollutant	Ambient Reference Concentrations (ug/m <sup>3</sup> )		
	8-hr	24-hr	Annual
n-hexane	1,760	419	200
toluene	1,880	448	400
benzene	30	7	0.12

Odor none objectionable

3. The total permitted VOC emissions from coatings and organic solvents at this facility shall not exceed 78 lb/hr and 319 tons/yr.

Operating Requirements

4. This facility is allowed to operate continuously (8760 hours per year).

PERMITTEE:  
Metal Container Corp.

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**SPECIFIC CONDITIONS:**

5. The permitted materials and utilization rates are as stated in the application. These rates include the following:

- A maximum annual production of 10.047 billion lids.
- A maximum annual usage of end sealant compound, tab lube, and clean up solvents of 168,027 gallons during any consecutive 12 month period.
- A maximum usage rate (all coatings and solvents) of 0.019 gallons/1000 lids.

6. Any other operating parameter established during compliance testing and/or inspection that will confirm the proper operation of this facility shall be included in the operating permit.

Compliance Determination

7. The permittee shall provide the Department with a determination of the VOC content of each coating using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A. The enclosed Appendix B (EPA 450/3-84-019), if properly completed for each affected coating, may be submitted in lieu of the Method 24 or 24A tests. New coating or similar coating supplied by a different manufacturer shall be tested for VOC content using EPA Method 24 and 24A or the above mentioned Appendix B prior initial use in production. Each coating shall be tested after it is diluted with the maximum amount of solvent used by the permittee for production. The use of a different coating with a higher than permitted VOC content or BACT limit is not allowed. Prior written notification is required in the event that the VOC content of a coating (not included in the application) increases above that of the previous coating in use. Material Safety and Data Sheets shall be maintained for all materials that are used. Notification shall be provided to the Northeast District office and shall include EPA Method 24 or Appendix B test results on the VOC content of the proposed coating and solvent. Testing procedures shall be consistent with applicable provisions of Chapter 62-297.

8. Compliance with the ambient reference concentrations shall be demonstrated based on calculations certified by a Professional Engineer registered in Florida using actual operating conditions. Determination of the ambient concentration for chemical organic compounds shall be determined by Department approved dispersion modeling calculations. These calculations shall be available upon request by the Department.

9. The permittee shall maintain a record of the clean up solvents used on a six month basis. A composite sample of the VOC content



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Metal Container Corp.

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**SPECIFIC CONDITIONS:**

in the waste solvents shall be established every six months using Method 24 or 24A as contained in 40 CFR 60, and adopted by reference in Chapter 62-297, F.A.C.

10. The permittee shall maintain accurate records of all coatings and solvents used at the facility for at least a two year period.

11. The permittee shall notify the Northeast District office in writing at least 15 days prior to any emissions testing performed by the permittee. The period prior to testing shall not exceed 180 days after construction is completed. Compliance test results shall be submitted to the Northeast District 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 62-296, 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.

Rule Requirements

13. This facility shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapters 62-4 and 62-210 through 297, Florida Administrative Code.

14. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state or local permitting requirements and regulations (Rule 62-210.300(1), F.A.C.).

15. According to Rule 62-296.320(1)(a), F.A.C., no person shall store, pump, handle, process, load, unload, or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Currently, there are no control strategies associated with this operation other than good operating practices to minimize pollutant emissions. At a minimum, the following procedures shall be followed to minimize pollutant emissions:

- 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;

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**SPECIFIC CONDITIONS:**

- o All fittings, valves, lines, etc., shall be properly maintained; and,
- o All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.,

16. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to Rule 62-296.320(2), F.A.C.

17. Pursuant to Rule 62-210.300(2), F.A.C., Air Operating Permits, the permittee shall be required to submit annual reports on the actual operation and emissions of the facility. Material balance reports are required to determine compliance with the emission limits in this permit and shall be sent to the Northeast District office to confirm emissions and update area-wide VOC emissions inventories. The quantity of lids processed per module shall be included in the report. At a minimum, this report shall also include VOC emission limits [lb/hr (monthly average)], [lb/day (monthly average)], [lb/month, (ton/yr)], manufacturer's certification of VOC content of coating, coating usage records, hours of operation, and test results.

18. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).

19. An application for an operation permit or a Title V operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (Rules 62-4.055 and 62-4.220, F.A.C.).

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**

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Virginia B. Wetherell, Secretary

Revised Best Available Control Technology (BACT) Determination  
Metal Container Corporation  
Alachua County

The applicant intends to modify an aluminum lid manufacturing facility in Gainesville, Florida by changing the hexane based end sealant compound with a heptane based compound. The modernization project accomplished in 1992 resulted in an increase in the facility's annual production capacity, from an existing 6.528 billion lids to 10.047 billion lids.

VOC emissions will be minimized through the use of low-solvent, high solids compounds.

In accordance with Rule 62-212.400(2)(f)(3) of the Florida Administrative Code (F.A.C.) a BACT review for volatile organic compounds (VOC) is required since the potential emissions increase exceeds the significant emission rate of 40 tons per year.

BACT Determination Requested by the Applicant:

The BACT determination requested by the applicant is based on the use of high solid/low VOC end sealant. The VOC content for the end sealant and other compounds proposed for use at the facility is given below:

<u>Compound</u>	<u>VOC Content (weight fraction)</u>
End Sealant	0.417
Tab Lube	0.945
Solvents	1.0

Date Receipt of a BACT Application:

February 15, 1995

Review Group Members:

This determination was based upon comments received from the applicant and the New Source Review Section.

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 62-212, Air Pollution, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case-by-case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of

Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Analysis:

A review of the BACT/LAER Clearinghouse indicates that BACT for lid manufacturing (total of two determinations) has been based on limiting the VOC content of the end sealant compound.

The first determination, made January 10, 1986, showed that BACT for a modified source was the use of an end sealant compound with a VOC content of 4.2 pounds/gallon minus water. The second, issued January 21, 1988, determined that BACT for a new source was the use of an end sealant compound with a VOC content of 3.7 pounds/gallon. These determinations are less stringent than that proposed by the applicant as being BACT for this project (VOC content equals 3.5 pounds/gallon). Originally, the BACT determination done in 1991 for this facility set a VOC limit of 3.2 pound/gallons. Although this limit is being relaxed, it is important to note that the new end sealant compound proposed DAREX SLC 4357NP-57.5, a heptane-based compound, will replace the compound currently in use, DAREX S9357 MHV, a hexane-based compound. Hexane compounds are considered hazardous air pollutants (HAPs). Therefore emissions of a HAP will be traded for those of a much less toxic, non-HAP.

In accordance with the "top-down" BACT procedure the applicant has evaluated two control technologies which would further reduce VOC emissions. The two technologies are:

1. The use of non-VOC (water-base) end sealant compounds.
2. Collection and destruction of VOC emissions through the use of thermal incinerator.

Both of these technologies were considered during the 1991 BACT review and were reconsidered in the present review. A summary of this review follows:

Water-Based End Sealant:

The applicant has indicated that there are both operational and technical difficulties associated with the use of water-based end sealant compound.

According to the applicant, water-based end sealant compound requires a longer curing time. In order to reduce the curing time, drying ovens must be added to drive off the water.

Additional equipment would be required if water-base sealant was used. Lid dryers, tankage, piping, instrumentation, and conveying equipment would be the minimum additional equipment required.

The applicant has indicated that the total levelized annual cost (operating plus amortized capital cost) to install and operate the additional equipment needed to utilize water-base end sealant compound would be approximately \$1.43 million. When this cost is taken into consideration with the annual VOC reductions that would be realized by using water-base end sealant compound (251 tons per year) the cost per ton of controlling VOC's would be \$5,700.

This cost (\$5,700/ton) is not representative of costs that have been previously justified as BACT and is judged not to be cost effective for this facility.

Thermal Incineration:

Incineration is a commonly used method to control the emissions of VOC's from various processes that utilize VOC-containing compounds. Emission reductions are achieved through this method by capturing the VOC's which are "flashed-off" during the manufacturing process and conveying them to an incinerator.

The applicant has stated that the lid manufacturing process does not lend itself to the capture of VOC due to the nature of the compounds used and the speed at which the ends pass through the lines. However, the applicant originally assumed that, the largest reductions could be achieved by ducting the scrap cyclones (VOC from tab lube) and the end liner and balancers (VOC from end sealant) to the thermal oxidizer. As such it was conceptually estimated that 65% of the VOC from these materials can be captured and ducted to a thermal oxidizer with a 90% destruction efficiency.

Subsequent to the original proposal, the applicant obtained additional technical information that invalidated assumptions made in the conceptual design of the thermal oxidation system control alternative as proposed above.

The applicant has indicated that due to the fugitive nature of the end sealant compound (heavier than air) and the slow evaporation rate of the tab lube, the system, as proposed, will not capture an appreciable amount of VOC emissions. It is estimated that 80% of the end sealant compound emissions will occur after the lining operation as fugitive emissions.

According to the applicant, the only method to ensure capture of significant quantities of emissions for incineration would be to fully enclose each of the liners and associated conveyors and balancers. This would lead to a loss of production due to the operational and maintenance inefficiencies associated with the enclosure and equipment required for the thermal oxidation system.

Regarding tab lube VOC emissions, the applicant has performed several evaporation tests. Based on the data the evaporation rate, the extremely low vapor pressure, and the fact that the scrap has a 30 second residence time in the cyclone system, it has been concluded that capture and incineration of the tab lube emissions is not a technically feasible means of control. Tab lube emissions will be minimized by the use of pre-lubricated tab stock.

The applicant has indicated that the total levelized annual cost to install and operate the additional equipment needed to capture and incinerator VOC emissions would, assuming 95% destruction in the incinerator, be approximately over \$1.57 million. When this cost is taken into consideration with the annual VOC reduction that would be realized by using the thermal oxidation system (95 tons per year), the cost per ton of controlling VOC's would be over \$16,500. This cost is not representative of costs that have been previously justified as BACT and is judged to be cost prohibitive for this facility.

Environmental Impact Analysis:

In addition to the bulk VOC control that could be achieved by using either water-based end sealant or thermal oxidation, such control would also reduce the amount of potential toxic emissions. The type and quantity of air toxics that are expected from the use of the proposed end sealant are given as follows:

<u>Air Toxic</u>	<u>pounds/hr</u>	<u>tons/yr</u>
n-hexane	0.2	0.8
n-heptane	33.8	138.9
cyclohexane	25.0	102.5
toluene	0.1	0.5
benzene	<0.001	<0.01

A review of the maximum impacts expected from these air toxics indicates that the use of the proposed end sealant, without additional control, results in ambient levels in impacts which are less than the Ambient Reference Concentrations.

BACT Determination by DEP:

Discussion:

The information presented by the applicant indicates that the use of high solid/low VOC end sealant still represents BACT for the proposed facility. Although the use of water-based end sealant would provide the greatest VOC control, the resulting cost to control VOC (\$5,700/ton) is judged to be too costly. The next level of control (thermal oxidation) was judged to be even more expensive.

A comparison of the economics and technical viability of the alternate technologies, and review of recent BACT/LAER determinations show that the use of high solids/low VOC end sealant compounds, and the use of pre-lubricated tab stock to minimize tab lube usage is BACT for the proposed lid plant modernization.

Conclusion:

Based on the discussion presented in this analysis, BACT for the Metal Container Corporation is represented by controlling the solvent content of the end sealant not to exceed 3.5 pounds VOC per gallon of sealant excluding water and by using pre-lubricated tab stock to minimize tab lube usage.

Details of the Analysis may be Obtained by Contacting:

A. A. Linero, P.E.  
Teresa Heron, Review Engineer  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

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

\_\_\_\_\_  
Virginia B. Wetherell, Secretary  
Dept. of Environmental Protection

\_\_\_\_\_  
Date 1995

\_\_\_\_\_  
Date 1995



Environmental Consulting & Technology, Inc.

May 22, 1995  
ECT No. 94273-0200

RECEIVED

MAY 23 1995

Bureau of  
Air Regulation

Mr. Cleve Holiday  
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

Dear Cleve:

Per our telephone conversation of May 18, 1995, Environmental Consulting & Technology, Inc. (ECT), is providing modeled ambient impacts for specific pollutant emissions from Metal Container Corporation's Gainesville Lid Plant. As shown on page 2-10 of the February 1995 permit application, emissions of n-hexane, toluene, and benzene will decrease as a result of the change in compounds. However, we did not submit any modeling studies to document the extent to which ambient impacts would correspondingly decrease. This letter provides that information.

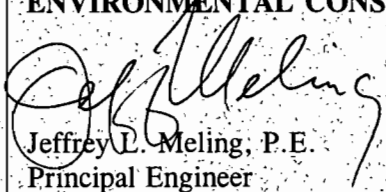
To provide the estimates of ambient impacts, results of past modeling studies were used. One pollutant, n-heptane, was modeled previously at the proposed emission rate of 33.8 lb/hr. Using these results, impacts for toluene and benzene were calculated based on the emission rates given in the permit application.

Table 1 summarizes the predicted impacts for the three pollutants and also compares the results to the Florida No-Threat Levels. As you can see, the predicted impacts are all well below the No-Threat Levels.

If you have any questions regarding this analysis, please call me at 904/332-6230, ext. 352.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



Jeffrey L. Meling, P.E.  
Principal Engineer

JLM/edd

Attachment

cc: D. Pusch, ABC, w/att.

G-PRJ95.3/JLM0522.1

3701 Northwest  
98<sup>th</sup> Street  
Gainesville, FL  
32606

(904)  
332-0444

FAX (904)  
332-6722



Table 1. Comparison of Modeled Ambient Impacts Versus Current Florida No-Threat Levels

Pollutant	Emission Rate (lb/hr)	Modeled Ambient Impacts ( $\mu\text{g}/\text{m}^3$ )			Florida No-Threat Levels ( $\mu\text{g}/\text{m}^3$ )		
		8-Hour	24-Hour	Annual	8-Hour	24-Hour	Annual
n-Hexane	0.2	4.01	2.54	0.40	1,760	422.4	200
Toluene	0.1	2.00	1.27	0.20	3,770	898	300
Benzene	0.001	0.02	0.01	0.002	30	7.2	0.12

Source: ECT, 1995.



ANHEUSER-BUSCH COMPANIES

May 12, 1995

Via Federal Express - 367-045-1304

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

Re: Metal Container Corporation - Gainesville Lid Center  
Modification to Air Permit No. AO 01-220792

Dear Ms. Heron:

In response to your requests of Mr. Jeffrey Meling of Environmental Consulting and Technology, Inc., regarding the referenced permit submittal, I'm submitting a check for \$5,500 to cover the additional processing fee associated with review of a PSD source. This amount is in addition to the \$2,000 sent with the original application submittal of February 10, 1995.

You had also requested usage limits which are to be used as permit limits in lieu of production limits. These are presented below, and are consistent with the emissions estimates presented in the original submittal, which total 319.1 tons per year (over 160 tons per year less than the currently permitted level).

	Annual Usage (Gallons)
end sealant compound	145,220
tab lube	15,071
cleanup solvent	
heptane	7,033
mineral spirits	703

If additional information is required please contact me at 314/577-4162.

Sincerely,

Dean E. Pusch  
Manager, Regulatory Issues  
Corporate Environmental Affairs

DEP:lb

**Attachment**

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

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COMPANIES, INC.

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1017-6554-7

Date

5-12-95

From (Your Name) Please Print

Dean Pusch

Your Phone Number (Very Important)

2 To (Recipient's Name) Please Print

Teresa Heron

Recipient's Phone Number (Very Important)

Company ANHEUSER-BUSCH CO INC

Department/Floor No.

Company

FL Dept. of Env. Protection

Department/Floor No.

Street Address 1 BUSCH PLACE

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes)

Twin Towers, 2600 Blair Stone Rd

City ST LOUIS

State MO

ZIP Required 63118

City Tallahassee, FL

State FL ZIP Required 32399

YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice)

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Street Address

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5 DELIVERY AND SPECIAL HANDLING (Check services required)

6 PACKAGING

WEIGHT

Emp. No. Date

Federal Express Use

Priority Overnight  
11  OTHER PACKAGING  
16  FEDEX LETTER  
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13  FEDEX BOX  
14  FEDEX TUBE

Standard Overnight  
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56  FEDEX LETTER  
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Saturday Service  
31  HOLD AT FEDEX LOCATION SATURDAY  
32  DELIVER SATURDAY  
3  SATURDAY PICK UP

Special Handling  
4  DANGEROUS GOODS  
5  DRY ICE  
6  Fragile (Use Shipper's Declaration for Insured)

Emp. No. Date  
 Clean Receipt  
 Return Shipment  
 Third Party  
Street Address  
City State Zip

Federal Express Use  
Base Charges  
Declared Value Charge  
Other 1  
Other 2  
Total Charges

Economy Two-Day  
30  ECONOMY  
70  OVERNIGHT FREIGHT

Government Overnight  
40  GOVT LETTER  
41  GOVT PACKAGE  
80  TWO-DAY FREIGHT

HOLIDAY DELIVERY if allowed  
12  HOLIDAY DELIVERY if allowed

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# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

May 9, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Busch:

RE: Application Fee for Metal Container Corporation - Lid Center  
AC01-265409 & PSD-FL-153  
Gainesville, Florida

This letter is to confirm the April 13, 1995, telephone conversation between Jeff Meling of Environmental Consulting & Technology, Inc. (ECT) and Teresa Heron of our staff. As discussed, this project is going to be reviewed under the Prevention of Significant Deterioration regulations (PSD). Before we can continue processing your application, you need to submit a check for \$5500 to the Department of Environmental Protection (DEP) to cover the application fee.

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

Sincerely,

A. A. Linero, P.E.  
Administrator  
New Source Review Section

AAL/th/t

cc: Robert Leech, NED  
Jeff Meling, ECT

no green card  
 as of 12-18-95  
 KLLD  
 per Patty Adams

Z 311 902 931



**Receipt for  
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PS Form 3800, March 1993

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Postage	\$
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Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	5-9-95
	AC01-265409
	PSD-FI-153



**ANHEUSER-BUSCH COMPANIES**

March 20, 1995

Mr. A. A. Linero, P.E., Administrator  
 New Source Review Section  
 Bureau of Air Regulation  
 Florida Department of Environmental Protection  
 Mail Stop 5500  
 Twin Towers Office Building  
 2600 Blair Stone Road  
 Tallahassee, FL 32399-2400

RECEIVED  
 MAR 21 1995  
 Bureau of  
 Air Regulation

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

Dear Mr. Linero:

*Metal Container Corporation has received your letter dated March 10, 1995, to Robert Lanham. This letter presents responses to the specific comments or information requests contained in the letter.*

**BACT ANALYSIS**

There is a discrepancy in the cost-effectiveness values given for the water-based technology; \$5700/ton removed (page 2 - Appendix E) and \$7013/ton removed (page 3-1). Which one is correct?

**Response**

*The figure of \$7,013 per ton of VOC removed presented in Section 3.1, is, as the title of this section indicates, a summary of the previous best available control technology (BACT) analysis (i.e., the analysis conducted in 1990 and 1991). As discussed in Section 3.2, "BACT Review of the Proposed Modification," water-based technology was reevaluated to reflect the reduction in some of the inefficiencies previously identified. This new analysis resulted in a cost-effectiveness of \$5,714 (p. 3-3, and Appendix E) for this project.*

The cost analysis for the thermal incineration technology is missing. Please submit this analysis.

**Response**

*For lid manufacturing facilities like the Gainesville plant, thermal incineration is not technically or economically feasible. This was conclusively demonstrated in the April 25, 1991 submittal to the Department (copy attached). The Department subsequently concurred with this position. All the information detailing the technical unfeasibility of such a system is still valid. The costs associated with this type of system have increased, based on MCC's experience with the installation of thermal oxidizers at can plants (not lid plants) in Jacksonville, FL, Rome, GA, and Mira Loma, CA. Therefore,*

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  
 Fax: 314/577-1032

Mr. A. A. Linero  
March 20, 1995  
Page 2

**the current costs would be even more prohibitive than the original estimates, given MCC experience, inflation, and the needs for additional enclosures and a significantly larger thermal oxidizer. These facts and the conclusions derived from them strongly support the validity of the previous analysis and make it unnecessary to redo this analysis.**

PSD APPLICABILITY

Actual emission shall be calculated as indicated in Rule 52-212(d)4, F.A.C. Please submit emission estimates for the years 1993 and 1994 for the Department evaluation.

Response

**It is assumed that the intended regulatory reference was 62-212.400(1)(d)4, F.A.C. With that assumption, please refer to Section 2.3 of the supplemental report that was part of the application package, beginning at Page 2-6. The second and third paragraphs cite the definitions of "net emissions increase" and "actual emissions" [62-212.200(2)(a), F.A.C.], including the regulatory language that allows the use of the most representative time period to determine actual emissions. As stated, 1994 emissions would not be representative of normal operations prior to this proposed modification. Production was limited by problems which are driving the need to change end sealant. A significant portion of 1994 production was smaller, 204 lids, resulting in lower emissions. The use of prelubricated tab stock was also beginning at the plant. Thus, 1993 was the most representative time period to determine actual emissions. In addition, at the time the application was prepared, the 1994 emissions report was not yet available. This report was recently completed, and a copy is attached. As shown, VOC emissions in 1994 were 215 tons per year (tpy). However, as we have stated, emissions in 1994 were not "representative" for the cited reasons. Therefore, 1993 emissions of 282.7 tpy are the most representative of normal operation prior to the changes requested in the application.**

**If any further information or clarification is required, please contact me at your earliest convenience. Thank you in advance for your attention to this matter.**

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Dean E. Pusch  
Manager, Regulatory Issues  
Environmental Affairs Department

DEP:lb

Attachment

cc: R. Lanham - MCC  
J. Meling - ECT

cc:  
N.E. District  
Jereca Heron

**METAL CONTAINER CORPORATION  
GAINESVILLE LID MANUFACTURING FACILITY  
1994 FLORIDA DER ANNUAL OPERATION REPORT  
ACTUAL VOLATILE ORGANIC COMPOUND EMISSIONS**

**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 S9357	24,738	8.60	0.377	40.10
	DAREX S9384	76,189	7.60	0.392	116.48
TAB LUBE	JENKIN-GUERIN #3810	11,189	6.35	0.945	33.57
CLEAN-UP SOLVENTS	HEPTANE, VWR *	6,602	5.80	1.000	19.48
	MINERAL SPIRITS*	354	6.31	1.000	1.12
	ISOPAR H	1,100	8.30	1.000	3.47
	ETHYLENE GLYCOL	110	7.50	1.000	0.41
<b>TOTAL ANNUAL EMISSIONS</b>					<b>214.62</b>
<b>HOURLY EMISSION RATE</b>	<b>HOURS OF OPERATION, 1994</b>	<b>8688</b>	<b>AVERAGE LBS VOC EMITTED/HOU</b>		<b>49.41</b>
<b>DAILY EMISSION RATE</b>	<b>DAYS OF OPERATION, 1994</b>	<b>362</b>	<b>AVERAGE LBS VOC EMITTED/DA</b>		<b>1185.75</b>
<b>MONTHLY EMISSION RATE</b>	<b>AVERAGE OF 30.42 DAYS/MONTH</b>	<b>11.9</b>	<b>AVERAGE LBS VOC EMITTED/MONT</b>		<b>36070.39</b>





# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 10, 1995

AIRS ID: 0010046

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Landham:

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

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

#### BACT ANALYSIS

There is a discrepancy in the cost effectiveness values given for the water-based technology; \$5700/ton removed (page 2 - Appendix E) and \$7013/ton removed (page 3-1 ). Which one is correct?

The cost analysis for the thermal incineration technology is missing. Please submit this analysis.

#### PSD APPLICABILITY

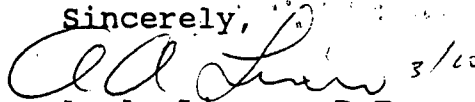
Actual emission shall be calculated as indicated in Rule 62-212(d)4, F.A.C. Please submit emission estimates for the years 1993 and 1994 for the Department evaluation.

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

Mr. Robert M. Lanham  
March 10, 1995  
Page Two

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

Sincerely,

Handwritten signature of A. A. Linero in cursive, with the date 3/10 written to the right.

A. A. Linero, P.E.  
Administrator  
New Source Review Section

AL/th/t

cc: John Cole, NE District  
Tom Davis, P.E., ECT

no green card  
 as of 12-18-95  
 KKW  
 per Patty Adams

Z 311 902 949



**Receipt for Certified Mail**

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PS Form 3800, March 1993

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AC 01-185835		
PSD-F1-153		



ANHEUSER-BUSCH COMPANIES

April 25, 1991

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

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

Dear Mr. Andrews:

Attached please find supplemental information on the referenced project for your review. This information presents technical data and a revised project scope that affect the Technical Determination and Preliminary Determination and the proposed permit to construct/modify the Gainesville facility.

Please don't hesitate to call me at (314) 577-4162 with any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

A handwritten signature in cursive script that reads "Dean E. Pusch".

Dean E. Pusch  
Sr. Environmental Scientist  
Attachment

DEP:cd

**METAL CONTAINER CORPORATION -  
GAINESVILLE LID PLANT  
MODERNIZATION PROJECT  
DER FILE NO. AC 01-185835, PSD-FL-153**

FACILITY PRODUCTION CAPACITY

Metal Container Corporation (MCC) has reevaluated the projected production requirements for the Gainesville Lid Plant with respect to the proposed modernization project. This reevaluation concluded that the production capacity of the plant, after the modernization project, can be reduced from the capacity of 11.445 billion lids originally requested in the August 1990 permit application.

The revised annual capacity of the plant will be 10.047 billion lids. This volume is based on conversion press capacity, which is consistent with previous permit applications for the plant.

FACILITY EMISSIONS

Reduction in the lid capacity and incorporation of revised VOC material usage rates result in a significant reduction of the facility's potential emissions from the emissions projected in the original August, 1990 application.

Since the original August 1990 and subsequent supporting submittals, end sealant and tab lube usage rates for 1990 became available. These usage rates reflect further reduction in usage consistent with reductions that the plant has achieved in past years.

Revised emissions were calculated, based on the average of 1989 and 1990 end sealant and tab lube usage, as well as the reduced lid capacity. Table 1 presents the revised emissions. These emissions are virtually all fugitive emissions.

The facility's potential annual emissions have dropped to 484 tons from 567 tons with the original submittals. This change will remove a potential 83 tons per year from the emission burden of the region.

The reduction in the plant's potential to emit will also reduce potential toxics emissions and their subsequent

TABLE 1

METAL CONTAINER CORPORATION  
 GAINESVILLE LID PLANT  
 MODERNIZATION PROJECT

VOC Emissions Basis

estimates based on conversion press capacity  
 press operating efficiency 95 %  
 annual operation 360 days  
 usage rates 1989 & 1990 actual

Specifications

<u>module</u>	<u>conversion presses</u>	<u>speed</u>	<u>lids/min</u>	<u>annual production</u>
7	3	1800	5400	2.659 billion
6	2	1800	3600	1.773 billion
5	3	1800	5400	2.659 billion
4	2	1200	2400	1.182 billion
off-line	2	1800	3600	1.773 billion
	total		20400	10.047 billion

Compound/Solvent Specifications

<u>compound</u>	<u>typical mfg ident</u>	<u>density [lb/gal]</u>	<u>VOC content [wt frax]</u>	<u>usage rate [gal/1000lids]</u>
end sealant	DM 2140	7.82	0.405	0.0169
tab lube	J-G 3810	6.35	0.945	0.0047
solvents	Texsolve C	5.84	1.000	0.0023
	Amsco 1241	6.32	1.000	0.0002

VOC Emissions

	<u>pounds/hr</u>	<u>tons/yr</u>
Module 7		
end sealant	18.7	76.8
tab lube	9.1	37.5
Texsolve C	4.7	19.3
Amsco 1241	0.4	1.6
total	32.9	135.2

	pounds/hr	tons/yr
<b>Module 6</b>		
end sealant	18.7	76.8
tab lube	6.1	25.0
Texsolve C	4.7	19.3
Amsco 1241	0.3	1.1
total	29.8	122.1
<b>Module 5</b>		
end sealant	18.7	76.8
tab lube	9.1	37.5
Texsolve C	4.7	19.3
Amsco 1241	0.4	1.6
total	32.9	135.2
<b>Module 4</b>		
end sealant	9.4	38.4
tab lube	4.1	16.7
Texsolve C	2.3	9.6
Amsco 1241	0.2	0.7
total	15.9	65.4
<b>Off-line Conversion Presses</b>		
end sealant	0.0	0.0
tab lube	6.1	25.0
Texsolve C	0.0	0.0
Amsco 1241	0.3	1.1
total	6.4	26.1
<b>Entire Facility</b>		
end sealant	65.5	268.7
tab lube	34.5	141.7
Texsolve C	16.4	67.5
Amsco 1241	1.5	6.0
total	117.9	483.9

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ambient impacts. These reductions are in addition to the reductions MCC obtained by changing to heptane based clean-up solvent (see December 10, 1990 submittal). Table 2 presents the facility's potential toxic emissions. Facility-wide n-hexane emissions will be reduced to a maximum of 89 tons per year compared to 104 tons in the original submittals. Thirty-eight tons will be emitted from end sealant usage on the two new modules. The maximum 24-hour ambient n-hexane impact from facility wide emissions will be  $287 \text{ ug}/\text{m}^3$ , well below the Florida Air Toxic Working Group's No-Threat Level for n-hexane of  $430 \text{ ug}/\text{m}^3$ .

#### CONTROL TECHNOLOGY ASSESSMENT

Subsequent to the August 1990 application submittal, Metal Container Corporation has obtained additional technical information that invalidates assumptions made in the conceptual design of the thermal oxidation system control alternative. The original proposal assumed that the major portion of emissions occurred at the point of application, i.e., at the liners for end sealant and at the conversion presses for tab lube. As such, it was believed that an estimated 65 percent of the emissions could be captured with hoods over the liners and balancers. These streams, and the exhaust of one of the scrap cyclones, were to be ducted to a thermal oxidizer. Given the fact that there are no thermal oxidizer systems at any lid plants that could be cited to either concur with, or disprove these assumptions, the conceptual system was believed to be adequate.

MCC has since acquired information indicating that the system, as conceptually designed, will not capture an appreciable amount of the VOC emissions from end sealant due to their fugitive nature. Figure 1 presents an emission rate curve for end sealant taken from "VOC Emission Controls for Can End Sealing Compounds - A Case History" (San Diego County Air Pollution Control District, March 1986). This figure shows that 80 percent of the emissions would occur after the lining operation. This information is supported by an ERM North Central study, "Conceptual Cost Estimates for Can End Sealing Compound VOC Emission Control" (September 1984), that cites a Can Manufacturing Institute estimate that 70 percent of solvent loss occurs during the curing cycle as fugitive emissions. Curing of the lids occurs after they are palletized.

Therefore, a maximum of 30 percent of the volatiles flash-off in the immediate vicinity of the liner. Given this



TABLE 2

METAL CONTAINER CORPORATION – GAINESVILLE LID PLANT  
 MODERNIZATION PROJECT

POTENTIAL TOXIC EMISSIONS (ENTIRE FACILITY)

Basis of Estimates

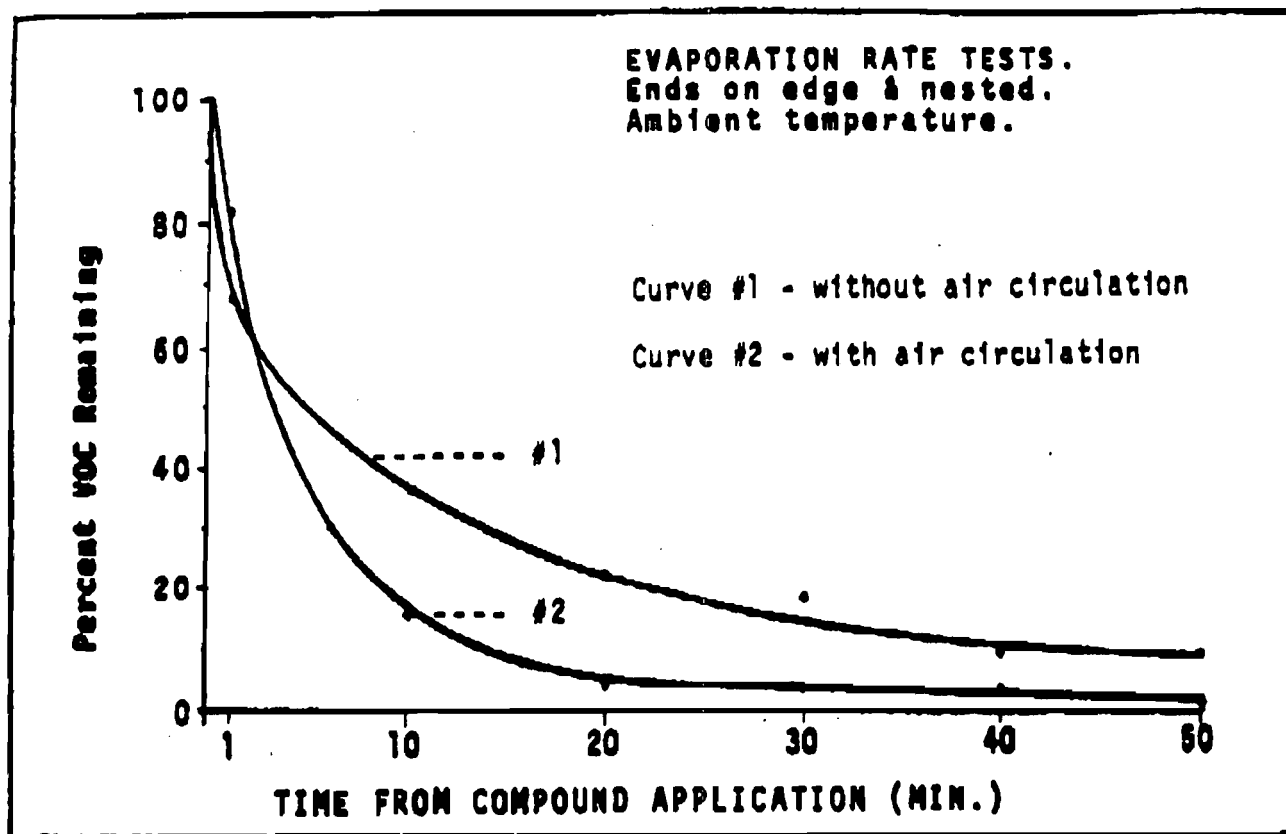
production	20400 lids/min;	10.047 billion lids/yr		
	<u>density</u> [lb/gal]	<u>usage rate</u> [gal/1000 lids]	<u>chemical</u>	weight percent
end sealant	7.82	0.0169	n-hexane	13
			n-heptane	3
			cyclohexane	2
			cyclohexylmethane	1
			benzene	0.001
Texsolve C	5.84	0.0023	n-hexane	4
			n-heptane	90
			cyclohexane	4
			toluene	4
			benzene	0.01
Amsco 1241	6.32	0.0002	stoddard solvent	100

Emissions

	pounds/hr	tons/yr
n-hexane	21.7	89.0
n-heptane	19.6	80.6
cyclohexane	3.9	16.0
cyclohexylmethane	1.6	6.6
toluene	0.7	2.7
benzene	0.003	0.01
stoddard solvent	1.5	6.0

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FIGURE 1



SOURCE: "VOC EMISSION CONTROLS FOR CAN END SEALING COMPOUNDS - A CASE HISTORY," MARCH 1986

information, and a vapor density for end sealant that is heavier than air, it is likely that the system would capture very little of the emissions from end sealant.

Based on the San Diego study, the only method to ensure capture of significant quantities of emissions for incineration would be to fully enclose each of the 14 liners and associated conveyors and balancers.

The enclosures would need to be constructed of Lexan to ensure complete operator visibility to allow them to monitor and manage the high speed production lines. The lower portions of the walls of the liner enclosures would need to be constructed of stainless steel to allow removal of spattered end sealant using cleanup solvents.

The enclosures would require doors to allow fork truck access to the balancers for removal of full pallets of lids. Pallets are removed from the balancers approximately every 35 minutes.

Capture efficiency and operation of the thermal oxidizer would be significantly affected by repeated access into the enclosure. Employees would enter the balancer area at least every fifteen minutes to clear jams and would enter the liner area a minimum of every two hours for cleaning. Access needs would be much higher when production problems would be encountered.

The enclosures would severely restrict access to the machines, making it very difficult to perform required maintenance. The liner nozzles and exit rails must be cleaned every two hours. The liners undergo major maintenance every six months that requires open access to the entire liner unit.

The extreme flammability of hexane, the principal solvent component of end sealant, presents significant safety problems with full enclosures. Air flow must be sufficient to maintain concentrations in the enclosures well below the lower explosive limit. The production lines would need to be shut down immediately whenever the flow through the enclosure was not adequate.

The operational and maintenance inefficiencies associated with the enclosures and equipment required for a thermal oxidation system would result in loss of production. This production loss would be required to be made up through lid

purchase on the spot market in order to meet contractual obligations.

MCC has also acquired information indicating that the system, as conceptually designed, could not capture VOC emissions from tab lube due to their fugitive nature and very low volatility. There are no tab lube emission capture systems in existence, even at facilities in the VOC non-attainment area in the South Coast Air Quality Management District of California. Therefore, without any real systems for a basis, MCC's conceptual capture system incorrectly assumed that 65 percent of tab lube emissions could be captured by ducting one of the scrap cyclone's exhaust to a thermal oxidizer.

The operational and maintenance inefficiencies would also increase manning requirements. An additional one-half man per shift would be required.

MCC has performed evaporation tests on the tab lube. This material has a vapor pressure of 0.27 mm Hg. Attachment A presents the study methodology and the resulting evaporation curve for tab lube on aluminum scrap suspended in a vacuum and tab lube in an aluminum pan incubated in a vacuum. The data show an extremely slow evaporation rate. Additional testing done for MCC in April 1991 indicates that tab lube remaining on the scrap has not completely volatilized after several days.

This slow evaporation rate is supported by operational information which shows pooling of the tab lube after it is knocked off the scrap in the turbulent environment of the scrap system duct work. Tab lube is also collected at the conversion presses for proper disposal. These facts, and the physical characteristics of the tab lube, indicate that there is little volatilization at the presses and in the scrap system; all of which invalidate the conceptual design assumptions for the tab lube emissions capture system.

The data on evaporation rate, the extremely low vapor pressure, and the fact that the scrap has a 30 second residence time in the cyclone system do not allow for capture of the tab lube emissions. Thus, capture and incineration of tab lube emissions is not a technically feasible means of control, as evidenced by the lack of any systems, even in areas where Lowest Achievable Emission Rate is required. Tab lube emissions will be minimized by automated controls on the presses that will limit tab lube usage and not allow operators to arbitrarily increase usage.

CONTROL SYSTEM COSTS

Based on the information presented above, capital costs for a system to capture and incinerate emissions due to end sealant compound use on the two new modules are estimated at \$2,680,000. This cost includes:

- o complete enclosure of the 14 liners, conveying equipment and balancers with Lexan and stainless steel;
- o automatic access doors;
- o fire protection equipment on the thermal oxidizer;
- o gas line installation;
- o ductwork; and
- o regenerative thermal oxidizer.

These costs are detailed in Attachment B.

The annualized costs, presented in Table 3, will be \$1,570,000. The capital recovery factor is based on an interest rate of 12 percent. This rate represents the return that MCC could get on its capital were it not invested in the thermal oxidizer system. The twelve percent rate is consistent with the current cost of capital, and is slightly lower than the required return on investment hurdle rate used for capital projects.

The system is assumed to capture 65 percent of the emissions from end sealant, based upon available data from experimental capture systems. A destruction efficiency of 95 percent is assumed for the regenerative thermal oxidizer. The system will control 95 tons per year of emissions from end sealant usage, representing a cost effectiveness of \$16,500 per ton of VOC removed. Therefore, capture and incineration is not best available control technology (BACT) due to these extremely excessive costs.

BEST AVAILABLE CONTROL TECHNOLOGY

The most recent BACT determinations presented by the USEPA in its BACT/LAER Clearinghouse document are:

- 1) use of low-solvent end sealant having a VOC content of 4.2 lb/gal, less water (1986); and

TABLE 3

GAINESVILLE LID PLANT MODERNIZATION  
THERMAL OXIDIZER COST ANALYSIS

( 1991 \$ )

TOTAL CAPITAL INVESTMENT (TCI) \$ 2,680,000

ANNUAL COSTS

COST DATA

ELECTRIC CHARGE (\$/KW-HR)	0.066
GAS CHARGE (\$/MMBTU)	4.2
INTEREST	0.12
USEFUL LIFE (YEARS)	10
CAPITAL RECOVERY FACTOR (CRF)	0.1770

DIRECT ANNUAL COSTS

ANNUAL ELECTRICAL USAGE	106,317
ANNUAL GAS USAGE	100,699
OPERATING & MAINTENANCE LABOR (0.5 MAN/SHIFT)	120,000
MAINTENANCE MATERIALS (100% OF LABOR)	120,000
LID PURCHASE (COMPENSATE PRODUCTION LOSS)	397,500
	-----
DIRECT ANNUAL COST (DAC)	844,516

INDIRECT ANNUAL COSTS

CAPITAL RECOVERY (CRF×TCI)	474,318
OVERHEAD (60% OF OPERATING & MAINTENANCE)	144,000
ADMINISTRATIVE CHARGES (0.02TCI)	53,600
PROPERTY TAX (0.01TCI)	26,800
INSURANCE (0.01TCI)	26,800
	-----
INDIRECT ANNUAL COST (IAC)	725,518

TOTAL ANNUALIZED COST (DAC+IAC) \$ 1,570,034

EMISSION REDUCTION

EMISSIONS WITH BACT (TONS/YEAR)	484
EMISSIONS USING THERMAL OXIDIZER (TONS/YEAR)	389
NET REDUCTION (TONS/YEAR)	95

COST EFFECTIVENESS (\$/TON OF VOC REMOVED) \$ 16,527

-----  
Data Sources

OAQPS Control Cost Manual, USEPA, January, 1990  
Anheuser-Busch Companies, Inc., April, 1991

- 2) use of low-solvent end sealant having a VOC content of 3.7 lb/gal, less water (1988).

Metal Container Corporation will use end sealant having a VOC content of 3.2 lb/gal, less water. This will ensure that the objective of any BACT evaluation -- to promote the use/development of more efficient emission control techniques -- is maintained. Thus, considering technical feasibility and economic reasonableness, the use of low solvent, high solids end sealant compound, and the use of automated equipment to regulate tab lube usage, is BACT for the modernization project.

**ATTACHMENT A**

**TABE ~~X~~ LUBE EVAPORATION CURVES**





ANHEUSER-BUSCH COMPANIES

# Interoffice Correspondence

April 15, 1991

To: Marlene Accardo

From: Lou Slapshak *LS*

Subject: **TAB LUBE - % NON-VOLATILES RECOVERY**

Confirming your request of 4/8/91, we have completed the study to measure the % Non-Volatiles in Tab Lube using two different methods.

- (1) Aluminum can stock was cut into strips (4" X 2") to provide 16 sq. inches of surface area. Each strip was cleaned and hung in a circular aluminum frame so that the surface was not in contact with the frame to minimize surface losses. The assembly was tared to constant weight and handled with clean forceps.

Four strips (A,B,C,D) were coated with the Tab Lube by dipping each into the neat Tab Lube (containing 4% dry solids). The strip was then put into the frame assembly and re-weighed to obtain the initial Tab Lube per strip (A=13.9, B=22.1, C=14.3, and D=14.8 mg/sqr. inch).

The strip-frame was then incubated under vacuum (15" Hg) at 26°C in a vacuum desiccator for various times and periodically re-weighed. The frame assembly allowed the % Non-Volatiles remaining on the strip to be measured by weighing without loss of surface residuals by touching other objects.

The % Non-Volatiles was monitored over about 4.3 hours. The results are plotted for each strip on Graph I.

- (2) A 1 gram sample of Tab Lube (containing 4% dry solids) was weighed into a tared aluminum pan (3.1 sq. inches) and incubated in a vacuum desiccator maintained at 15" Hg and 72°F. Periodically, the vacuum was released, and the sample residual weight measured. The study was run for about 3.9 hours and the results are plotted on Graph II. Results are reported as "grams tab lube in aluminum pan" which is the same as non-volatile recovery vs. time (minutes).

If you need more information about the study, please call me.

cc: J. Teng  
D. Hutchinson  
K. Christopher  
S. Misra  
F. Damhesel  
T. Waskovich

GRAPH I  
(METHOD #1)

**PERCENT NON-VOLATILES RECOVERY**

OKLAHOMA TAB-LUBE (NO. 592)

CONDITIONS: AL. STRIPS 2 4" X 2" (16 IN.<sup>2</sup> SURFACE AREA)

INITIAL TAB LUBE / STRIP (BEFORE DRYING @ 15" VACUUM - 26.2°C)

- A: 13.9 MG/IN.<sup>2</sup>      ■ C: 14.3 MG/IN.<sup>2</sup>
- B: 22.1 MG/IN.<sup>2</sup>    ▲ D: 14.8 MG/IN.<sup>2</sup>

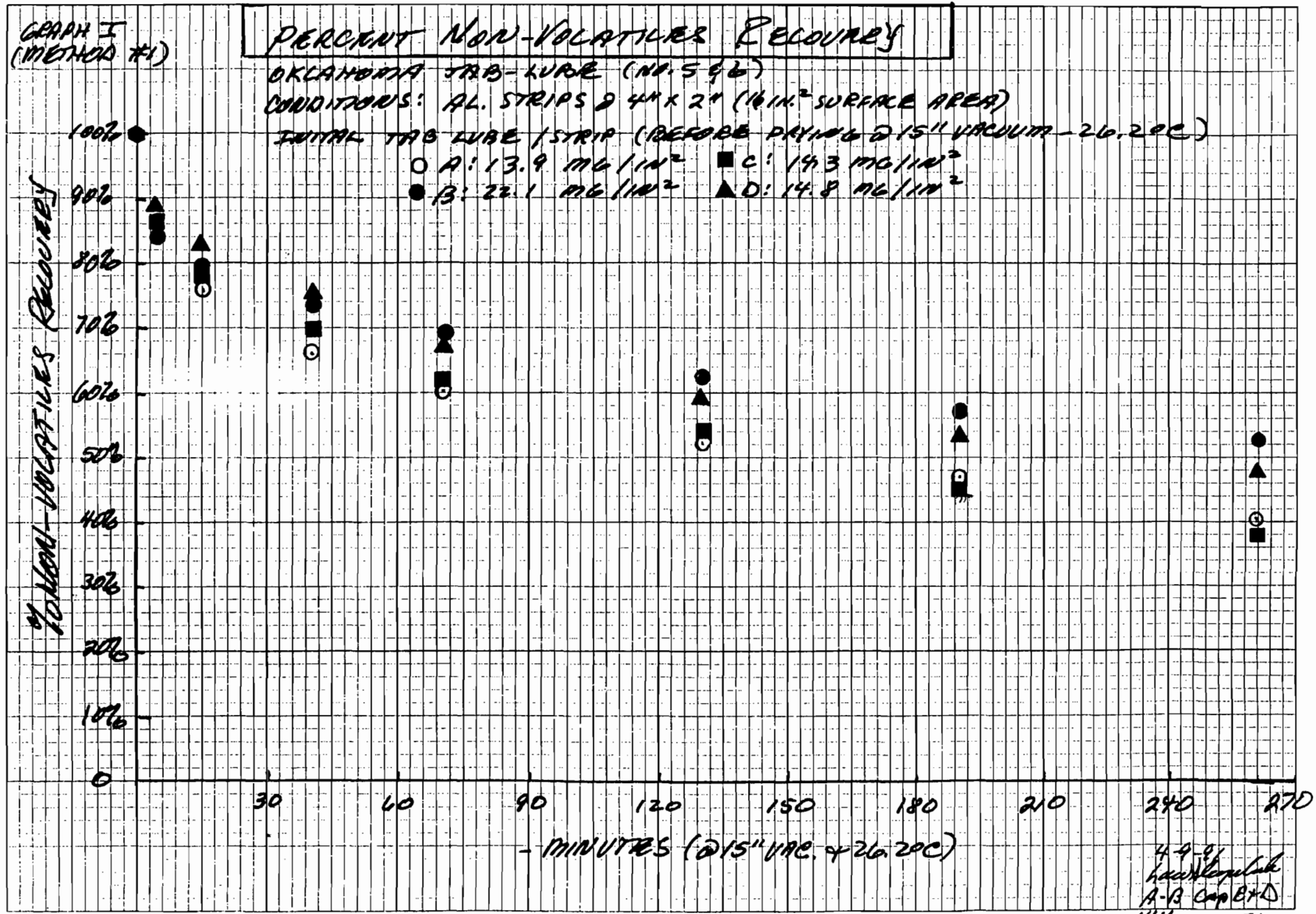
% NON-VOLATILES RECOVERY

100%  
90%  
80%  
70%  
60%  
50%  
40%  
30%  
20%  
10%  
0

30      60      90      120      150      180      210      240      270

- MINUTES (@ 15" VAC. & 26.2°C)

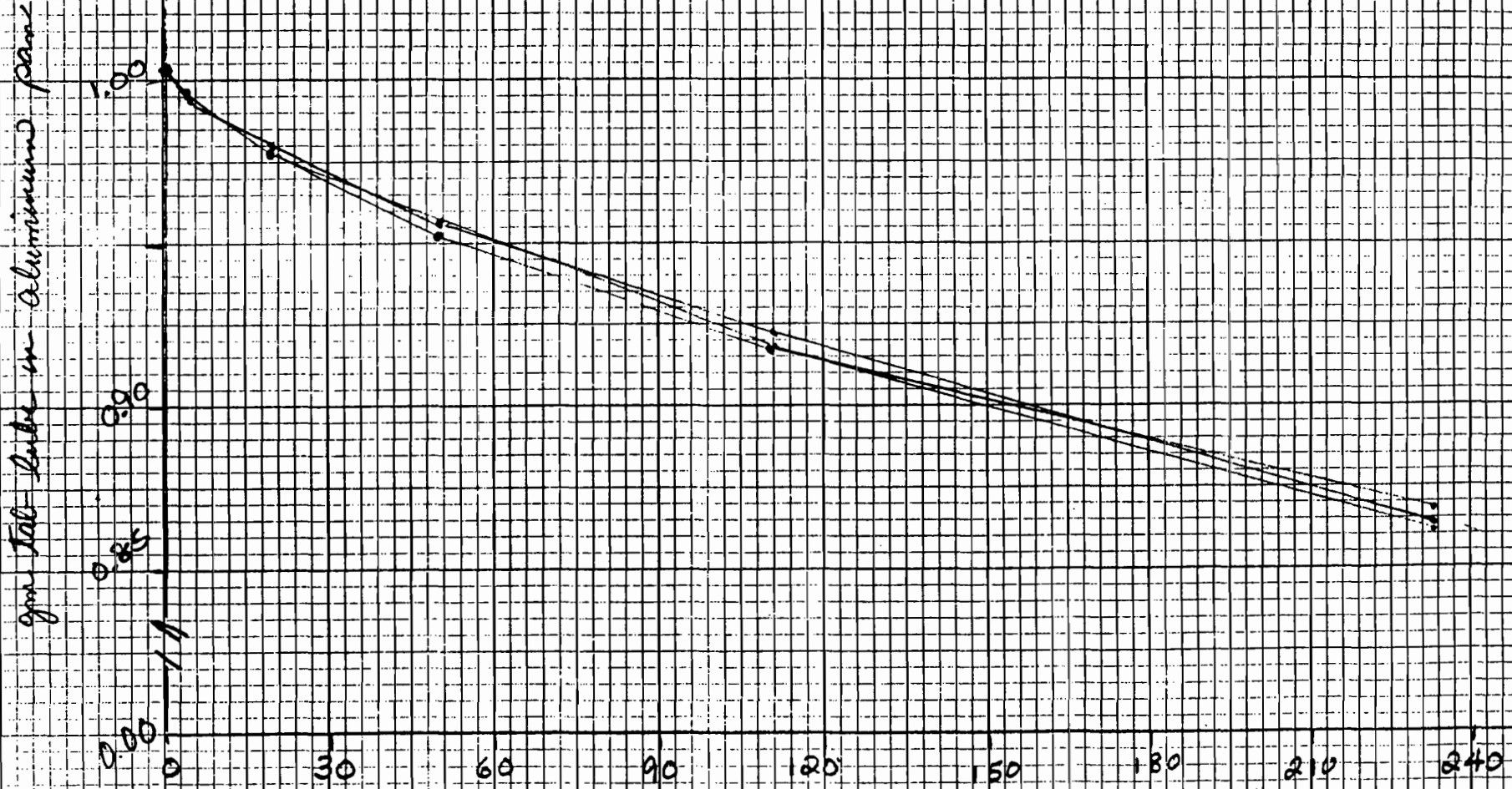
4-9-81  
K&E Lab  
A-B Cap B+D  
1716-170,171



GRAPH II  
(METHOD #2)

TAB LUBE SOLVENT EVAPORATION RATE

SAMPLE: OKLAHOMA TAB LUBE #1  
72°F / AMBIENT TEMPERATURE  
1.0 gm tab lube into a tared  
aluminum pan (13.1 in<sup>2</sup>)



minutes under -15 in Hg vacuum

NSF 1434A/64-66

*[Handwritten signature]* 4/9/91

**ATTACHMENT B**

**THERMAL OXIDIZER SYSTEM COST ESTIMATE**

SUBSIDIARY: MCC  
 LOCATION: JACKSONVILLE BREWERY  
 DATE: 04/18/91

(\$000)

Prepared By: \_\_\_\_\_  
 Approved By: \_\_\_\_\_

TITLE: GAINESVILLE THERMAL OXIDIZER ADDITION

ACCT CODE	DESCRIPTION	CONTR. JOB COST	--- A-B JOB COST ---			TOTAL
			EQUIP	MATERIAL	LABOR	
<b>CAPITAL COSTS:</b>						
004-000	Yard Utilities	266.5				266.5
007-000	Railroads	5.9				5.9
216-000	Concrete	73.9				73.9
218-000	Misc. Metals	268.5				268.5
221-000	Siding	8.0				8.0
225-000	Doors & Frames	16.3	20.6			36.9
232-000	Fire Protection	16.0				16.0
318-000	Equipment Installation	21.3	808.5			829.8
341-000	Process Misc. Metals	7.0				7.0
343-000	Process Ventilation	101.2				101.2
353-000	C.S. Piping - 2 1/2" &	16.0				16.0
400-000	Electrical	169.5	51.5			221.0
700-000	Contractors Indirects	102.3				102.3
792-000	Tools & Equipment	26.6				26.6
920-100	Sales Tax	24.9	52.8			77.7
<b>SUBTOTAL CAPITAL COST</b>		<b>1123.8</b>	<b>933.4</b>			<b>2057.2</b>
895-100	Engineering (12%)	246.9				246.9
910-100	Constr. Support ( 5%)	66.9				66.9
940-100	Owner's Adds & Omits:					
	(Equip - 15%)		140.0			140.0
	(Const - 15%)	169.0				169.0
	(Engr - 0%)					
<b>TOTAL CAPITAL COST</b>		<b>1606.6</b>	<b>1073.4</b>			<b>2680.0</b>
<b>EXPENSE COSTS:</b>						
<b>TOTAL EXPENSE COST</b>						
<b>TOTAL PROJECT COST</b>		<b>1606.6</b>	<b>1073.4</b>			<b>2680.0</b>

PRIME A/C NO	DESCRIPTION	LABOR HOURS	LABOR \$	MATERIAL \$	SUBCONTRACTOR \$	AB EQUIP ALLOWANCE	TOTAL \$
004	Yard Utilities	0	0	0	266,500	0	266,500
007	Railroads	0	0	0	5,863	0	5,863
216	Concrete	1,725	47,810	23,745	2,324	0	73,879
218	Misc. Metals	4,060	112,527	51,008	104,932	0	268,467
221	Siding	0	0	0	7,995	0	7,995
225	Doors & Frames	320	7,307	0	8,980	20,600	36,887
232	Fire Protection	0	0	0	15,990	0	15,990
318	Equipment Installation	600	15,395	5,863	0	808,550	829,808
341	Process Misc. Metals	26	696	1,605	4,664	0	6,965
343	Process Ventilation	0	0	0	101,246	0	101,246
353	C.S. Piping - 2 1/2" & Greater	0	0	0	15,990	0	15,990
400	Electrical	0	0	0	169,494	51,500	220,994
700	Contractors Indirects	0	0	0	102,336	0	102,336
792	Tools & Equipment	0	0	0	26,650	0	26,650
920	Sales Tax	0	0	4,933	19,991	52,639	77,763
<b>DIRECT PROJECT COST:</b>		<b>6,731</b>	<b>183,735</b>	<b>87,154</b>	<b>852,955</b>	<b>933,489</b>	<b>2,057,333</b>
895 Engineering							246,880
910 Construction Support							66,852
940 Equipment Contingency							140,023
940 Construction Contingency							168,577
940 Engineering Contingency							0
<b>GRAND TOTAL:</b>							<b>2,679,665</b>

FROM: ABC CORP. PKG. SHIPPING

TO: ENVIRONMENTAL ENGR

APR 24, 1991 4:05PM #566 P.03

AREA	PRIME-SUB-UTL	DESCRIPTION	QUANTITY	UNIT	MATERIAL \$ /UNIT	LABOR MH /UNIT	SUBCONTR \$ /UNIT	LABOR HOURS	LABOR \$	MATERIAL \$	SUBCONTR. \$	AS EQUIP ALLOWANCE	TOTAL \$
320	341-100-000	Pipe Bridge (Ext.)	35.00	LF	0.00	0.000	125.00	0	0	0	4,664	0	4,664
320	341-100-001	Fencing	170.00	LF	8.05	0.154	0.00	26	696	1,605	0	0	2,301
Process Misc. Metals TOTAL			205.00					26	696	1,605	4,664	0	6,991
<u>Process Ventilation</u>													
320	343-120-001	Ductwork	26165.00	LBS	0.00	0.000	3.50	0	0	0	97,622	0	97,622
320	343-120-002	14" x 12" Register	4.00	EA	0.00	0.000	250.00	0	0	0	1,066	0	1,066
320	343-120-003	8" x 8" Register	16.00	EA	0.00	0.000	150.00	0	0	0	2,558	0	2,558
Process Ventilation TOTAL			26185.00					0	0	0	101,246	0	101,246
<u>C.S. Pipe - 2 1/2" &amp; Up</u>													
320	353-050-000	Gas Piping @ T.O.	1.00	LS	0.00	0.000	15000.00	0	0	0	15,990	0	15,990
C.S. Pipe - 2 1/2" & Up TOTAL			1.00					0	0	0	15,990	0	15,990
<u>Process Electrical</u>													
320	400-100-001	Exterior Lighting	4.00	EA	0.00	0.000	3000.00	0	0	0	12,792	0	12,792
320	400-100-002	Interior Lighting	14.00	EA	0.00	0.000	500.00	0	0	0	7,462	0	7,462
320	400-300-000	Process Electrical	1.00	LS	0.00	0.000	90000.00	0	0	0	95,940	20,600	116,540
320	400-300-001	PLC Control & Interlocks	1.00	LS	0.00	0.000	50000.00	0	0	0	53,300	30,900	84,200
Process Electrical TOTAL			20.00					0	0	0	169,494	51,500	220,994
<u>Indirects</u>													
320	700-100-000	Indirects	1.00	LS	0.00	0.000	96000.00	0	0	0	102,336	0	102,336
Indirects TOTAL			1.00					0	0	0	102,336	0	102,336
<u>Tools &amp; Equip</u>													
320	792-102-000	Crane Rental	1.00	LS	0.00	0.000	25000.00	0	0	0	26,650	0	26,650
Tools & Equip TOTAL			1.00					0	0	0	26,650	0	26,650
<u>Owner Internal Acct.</u>													
320	910-118-000	Performance Testing	1.00	LS	0.00	0.000	10000.00	0	0	0	10,660	0	10,660
Owner Internal Acct. TOTAL			1.00					0	0	0	10,660	0	10,660
320	920-000-000	SALES TAX							0	4,933	20,247	52,839	78,019
DIRECT AREA COST								6,731	183,735	87,154	663,871	933,489	2,068,000

FROM: ABC CORP. PKG. SHIPPING

TO: ENVIRONMENTAL ENGR

APR 24, 1991 4:05PM #566 P.04

ANHEUSER-BUSCH COMPANIES, I.W.C.  
ESTIMATE DETAIL LISTING  
FOR ESTIMATE # 90397  
GAINESVILLE THERMAL OXIDIZER ADDITION

AREA PRIME-SUB-DTL	DESCRIPTION	QUANTITY	UNIT	MATERIAL \$ /UNIT	LABOR MH /UNIT	SUBCONTR \$ /UNIT	LABOR HOURS	LABOR \$	MATERIAL \$	SUBCONTR. \$	AS EQUIP ALLOWANCE	TOT \$
<u>Yard Utilities</u>												
320 004-100-000	Gas Line	1.00	LS	0.00	0.000	250000.00	0	0	0	266,500	0	266,5
	<b>Yard Utilities TOTAL</b>	<b>1.00</b>					<b>0</b>	<b>0</b>	<b>0</b>	<b>266,500</b>	<b>0</b>	<b>266,5</b>
<u>Railroads</u>												
320 007-100-000	Demo Railroads & Repair	100.00	LF	0.00	0.000	55.00	0	0	0	5,863	0	5,8
	<b>Railroads TOTAL</b>	<b>100.00</b>					<b>0</b>	<b>0</b>	<b>0</b>	<b>5,863</b>	<b>0</b>	<b>5,8</b>
<u>Concrete</u>												
320 216-100-000	Concrete Curb @ Enclosures	436.00	LF	0.00	0.000	5.00	0	0	0	2,324	0	2,3
320 216-140-000	Concrete - Equipt Foundations	150.00	CY	135.00	11.500	0.00	1,725	47,810	23,745	0	0	71,5
	<b>Concrete TOTAL</b>	<b>586.00</b>					<b>1,725</b>	<b>47,810</b>	<b>23,745</b>	<b>2,324</b>	<b>0</b>	<b>73,8</b>
<u>Misc. Metals</u>												
320 218-100-000	Misc Metal Framing @ Enclosure	25800.00	LBS	0.00	0.000	3.00	0	0	0	82,508	0	82,5
320 218-122-000	Lexan Enclosures	5800.00	SF	7.50	0.700	2.50	4,060	112,527	51,008	22,428	0	185,5
	<b>Misc. Metals TOTAL</b>	<b>31600.00</b>					<b>4,060</b>	<b>112,527</b>	<b>51,008</b>	<b>104,932</b>	<b>0</b>	<b>268,4</b>
<u>Siding</u>												
320 221-100-000	Wall Panels @ T.O.	500.00	SF	0.00	0.000	15.00	0	0	0	7,995	0	7,9
	<b>Siding TOTAL</b>	<b>500.00</b>					<b>0</b>	<b>0</b>	<b>0</b>	<b>7,995</b>	<b>0</b>	<b>7,9</b>
<u>Doors &amp; Frames</u>												
320 225-100-000	Automatic Doors @ Enclosures	4.00	EA	0.00	80.000	2000.00	320	7,307	0	8,980	20,600	36,1
	<b>Doors &amp; Frames TOTAL</b>	<b>4.00</b>					<b>320</b>	<b>7,307</b>	<b>0</b>	<b>8,980</b>	<b>20,600</b>	<b>36,1</b>
<u>Fire Protection</u>												
320 232-100-000	Fire Protection @ T.O.	1.00	LS	0.00	0.000	15000.00	0	0	0	15,990	0	15,9
	<b>Fire Protection TOTAL</b>	<b>1.00</b>					<b>0</b>	<b>0</b>	<b>0</b>	<b>15,990</b>	<b>0</b>	<b>15,9</b>
<u>Process Equipment</u>												
320 318-340-002	Thermal Oxidizer	1.00	EA	5000.00	600.000	0.00	600	15,395	5,863	0	772,500	793,
320 318-340-003	Freight	1.00	LS	0.00	0.000	0.00	0	0	0	0	36,050	36,
	<b>Process Equipment TOTAL</b>	<b>2.00</b>					<b>600</b>	<b>15,395</b>	<b>5,863</b>	<b>0</b>	<b>808,550</b>	<b>829,</b>
<u>Process Misc. Metals</u>												

FROM: ABC CORP. PKG. SHIPPING TO: ENVIRONMENTAL ENGR APR 24, 1991 4:06PM #566 P.05





**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  
Fax: 314/577-1032

# 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

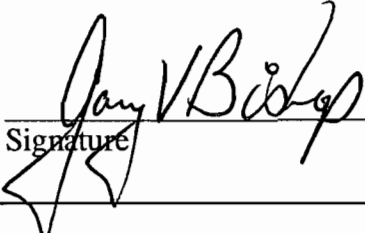
Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility name, if any; and a brief reference to the facility's physical location. If known, also enter the ARMS or AIRS facility identification number. This information is 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.

*Metal Container Corporation  
Gainesville Lid Plant (ID No. 31GVL010046)  
Gainesville, Florida*

#### 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.

**Scope of Application**

This Application for Air Permit addresses the following emissions unit(s) at the facility (or Title V source). An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

**Emissions Unit ID**

**Description of Emissions Unit**

<b>Emissions Unit ID</b>	<b>Description of Emissions Unit</b>
<i>GLP-1</i>	<i>Gainesville Lid Plant (all production-related activities)</i>

**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 &amp; 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:

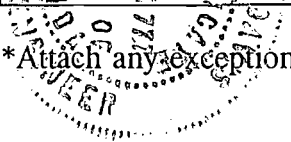
*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(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 H. Davis* \_\_\_\_\_ 2/12/95  
Signature Date



\* 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: <span style="float: right;">[ ] Unknown</span> <i>31GVL010046</i>			
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 [ <b>X</b> ] 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
-----

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

<i>A complete list of federal, state, and state-enforceable local air pollution regulations applicable to the facility as a whole will be submitted within the initial Title V operating permit application for the Gainesville Lid Plant. Submission of a complete list prior to the initial Title V operating permit application submission would be premature. Specific regulations applicable to the plant's single emissions unit are detailed in Section III of this air construction permit application.</i>	

### 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:	<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      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 Information Section 1 of 1

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section:  <i>All production equipment, including shell presses, end liners, and conversion presses, and cleanup activities.</i>		
2. ARMS Identification Number: [ ] No Corresponding ID [ <b>X</b> ] Unknown		
3. Emissions Unit Status Code:  <b>A</b>	4. Acid Rain Unit? [ ] Yes [ <b>X</b> ] No	5. Emissions Unit Major Group SIC Code:  <b>34</b>
6. Initial Startup Date (DD-MON-YYYY): <b>03-APR-1995</b>		
7. Long-term Reserve Shutdown Date (DD-MON-YYYY): <b>N/A</b>		
8. Package Unit: Manufacturer: <b>N/A</b> Model Number: <b>N/A</b>		
9. Generator Nameplate Rating: <b>N/A</b> MW		
10. Incinerator Information: Dwell Temperature: °F Dwell Time: <b>N/A</b> seconds Incinerator Afterburner Temperature : °F		
11. Emissions Unit Comment:		

Emissions Unit Information Section 1 of 1

**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 <i>N/A</i>
2. Maximum Incineration Rate: lb/hr tons/day <i>N/A</i>
3. Maximum Process or Throughput Rate: <i>N/A</i>
4. Maximum Production Rate: <i>N/A</i>
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:			
<i>24</i>	hours/day	<i>7</i>	days/week
<i>52</i>	weeks/year	<i>8,760</i>	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.)

N/A
-----

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>						

**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: <b>VOC</b>	
2. Total Percent Efficiency of Control:	% <b>0</b>
3. Primary Control Device Code: <b>N/A</b>	
4. Secondary Control Device Code: <b>N/A</b>	
5. Potential Emissions:	<b>78.0 lb/hour</b> <b>319.1 tons/year</b>
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
7. Range of Estimated Fugitive/Other Emissions:	<b>N/A</b> <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3            _____ to _____ tons/year
8. Emission Factor: <b>Material balance</b> Reference: <b>See Section 2.0 of attached report.</b>	
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: <b>See Section 2.0 of attached report.</b>	
11. Pollutant Potential/Estimated Emissions Comment:  <b>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. . ."</b>	

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</i> lb/hour <i>319.1</i> tons/year
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</i> lb/hr <i>251.0</i> tons/year
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: <i>N/A</i>			
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:		N/A	
2. CMS Requirement:		[ ] Rule	[ ] 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 <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
12. Enhanced Monitoring Plan <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID:____ <input type="checkbox"/> Not Applicable
14. Acid Rain Application (Hard copy Required)  <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID:____  <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID:____  <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID:____  <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID:____  <input type="checkbox"/> 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 98<sup>th</sup> 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:

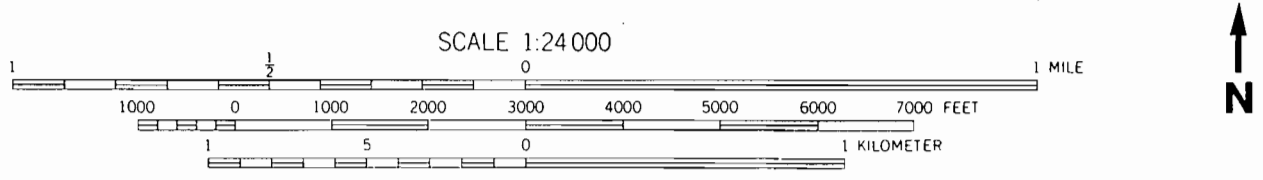
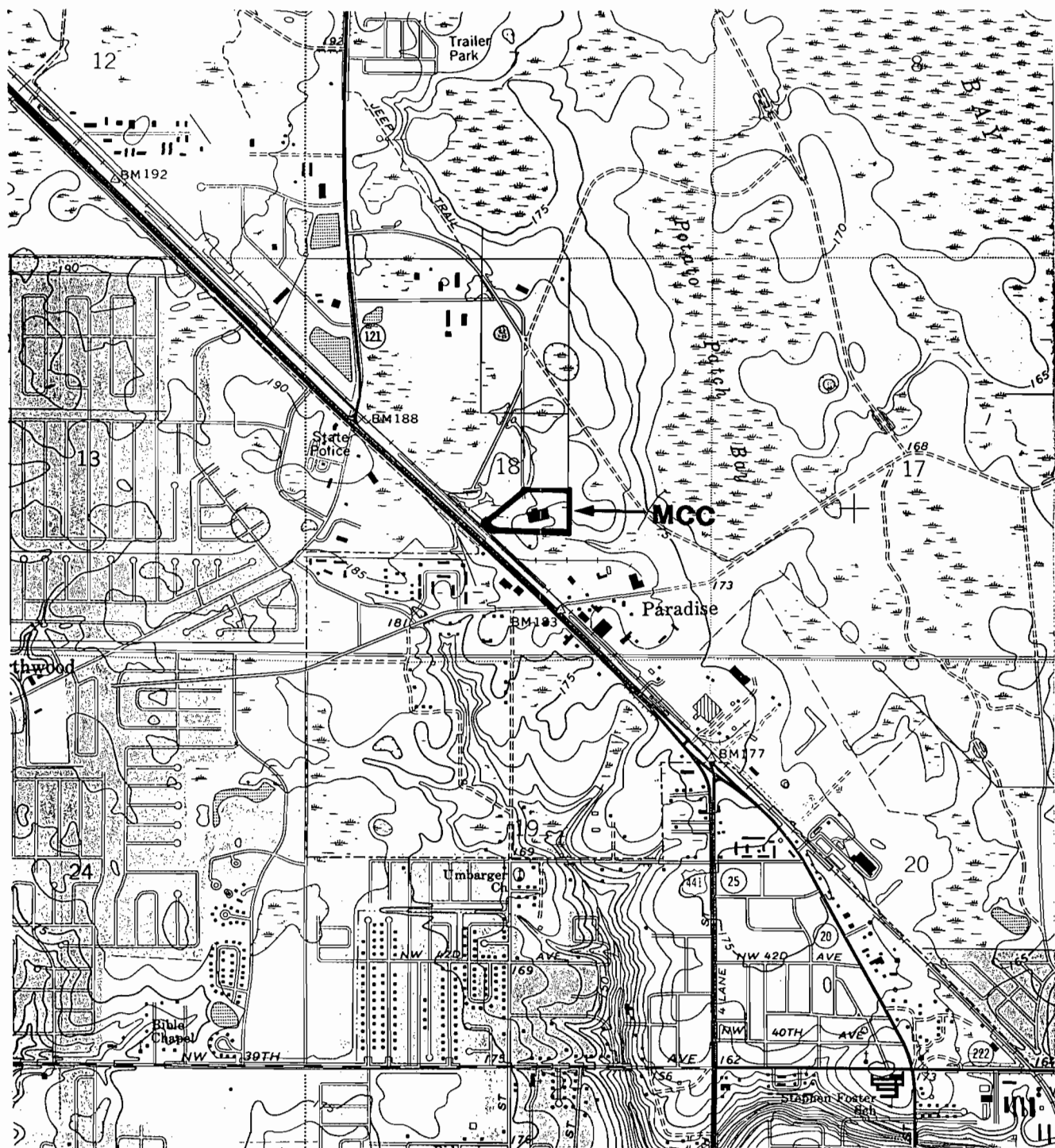


FIGURE 1-1.  
SITE LOCATION MAP

Source: ECT, 1994.

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- 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:

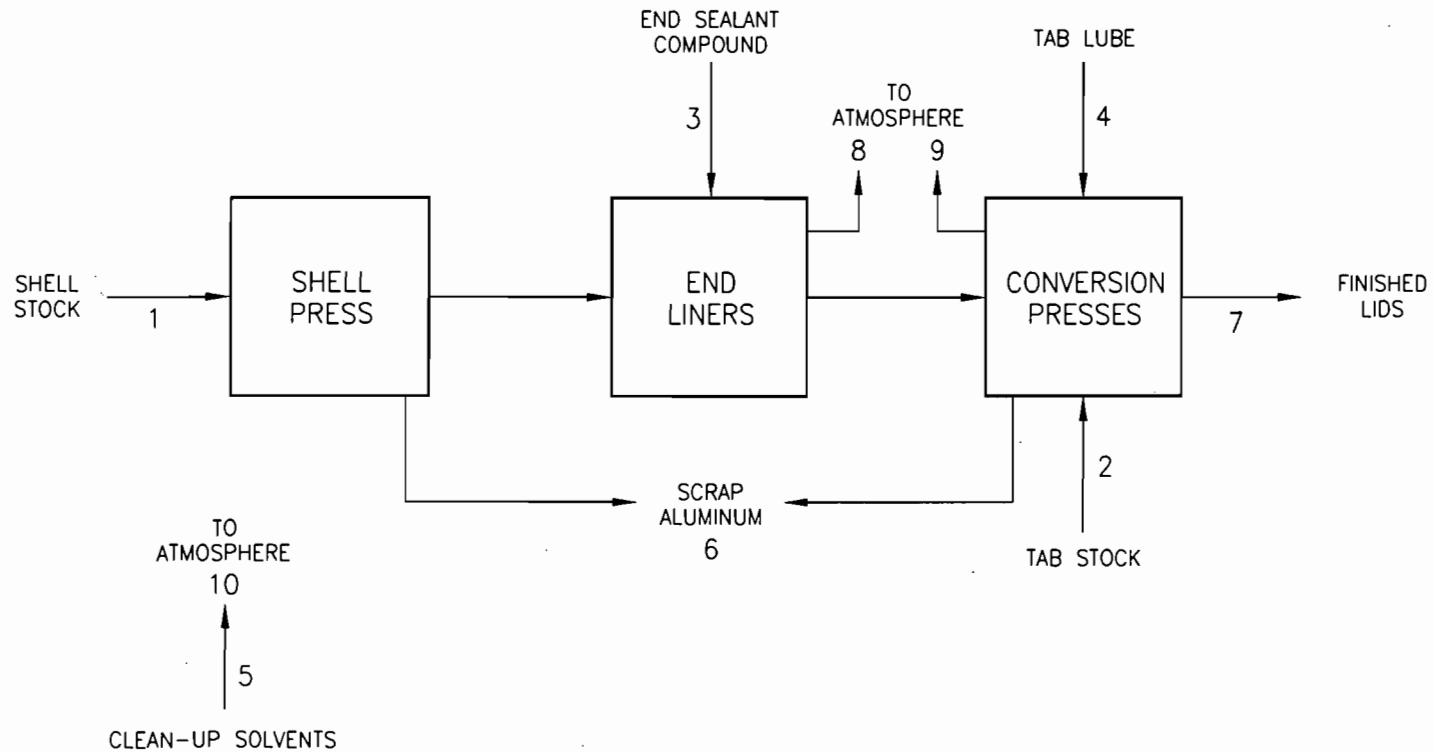
- End sealant—3.2 pounds of volatile organic compound per gallon (lb VOC/gal) (excluding water).
- Tab lube—6.0 lb VOC/gal (excluding water).
- Cleanup solvents—6.32 lb VOC/gal mineral spirits; 5.84 lb VOC/gal heptane.

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
	Shell Presses	End Liners	Conversion Presses	Lids/Yr (billion)
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: 07/18/94  
File: C:\ACAD\94273\ABFLOW

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

Source: MCC, 1994.

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<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>
<b>TOTALS</b>	<b>118</b>	<b>484</b>

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 <sup>6</sup>/<sub>16</sub> inches), and “204” lids (i.e., lids with a diameter of 2 <sup>4</sup>/<sub>16</sub> 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
<b>TOTAL</b>					<b>319.1</b>

\*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 (<math>\mu\text{g}/\text{m}^3</math>)</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.

<b>Attendees:</b> <u>FDEP</u>	<u>Representing MCC</u>
Preston Lewis	Dean Pusch (A-B)
Theresa Heron	Jeff Meling (ECT)
Cleve Holiday	
John Glunn	

#### 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 for 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.

Mr. Clair Fancy

July 1, 1994

Page 2

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 Two

cyclohexylmethane	32,000	7,619	--
toluene	--	--	2,000
benzene	--	--	0.123
stoddard solvent	5,250	1,250	--

Odor None Objectionable

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

Pollutant	Acceptable Ambient Concentration (ug/m <sup>3</sup> )		
	8-hr	24-hr	Annual
n-hexane	1,760	422.4	200
toluene	--	--	300
benzene	--	--	0.123

Odor None Objectionable

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

The Petition shall contain the following information:

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

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. Foutwell 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 DevelopmentCAM/jvc  
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 ( $D_c$ )<sub>s</sub>: 8.3 lb/gal 1.0 kg/l  
 (ASTM D1475)

B. Total Volatiles ( $M_v$ )<sub>s</sub>: 42.0 Weight Percent  
 ASTM D2369  Other\*\*

C. Water Content: 1. ( $M_w$ )<sub>s</sub> 0.3 Weight Percent  
 ASTM D3792  ASTM D4017  Other\*\*  
 2. ( $V_w$ )<sub>s</sub> 0.3 Volume Percent  
 Calculated  Other\*\*

D. Organic Volatiles ( $M_o$ )<sub>s</sub>: 41.7 Weight Percent

E. Nonvolatiles Content ( $V_n$ )<sub>s</sub>: 42.4 Volume Percent

F. VOC Content (VOC)<sub>s</sub>: 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

% by Weight

Rubber, resin, filler, pigment, and modifiers.

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 (Penak-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

PAGE : 1 OF 3

The data included herein are presented according to W. R. Grace & Co.-Conn.'s practices current at the time of preparation hereof, and 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 national, federal, state, and local laws and regulations applicable to safety, occupational health, right-to-know and environmental protection.

**SAFETY DATA**

DAREXO SLC 4357NP-57.5

**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: 0001

**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**

BEST AVAILABLE COPY

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:\WGAINESVILLE93AIR

P.02

ENU ENG

TO

MCC-ENG TECH

JUL-05-1994 12:11 FROM

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	1,816	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).



**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
---------------------	-----------

TAXES	142,000
FREIGHT (INCLUDED IN EC)	

PURCHASED EQUIPMENT COST (PEC)	2,401,900
--------------------------------	-----------

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
--------------------------------	-----------

TOTAL DIRECT COST (DC)	3,477,700
------------------------	-----------

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
---------------------------	---------

TOTAL CAPITAL INVESTMENT (TCI) = (DC + IC)	\$ 4,448,138
--	--------------

**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

**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

TOTAL ANNUALIZED COST (DAC + IAC) \$ 1,434,778

**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

-----  
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 10.047 billion lids.~~
- A maximum usage rate (all coatings and solvents) of 0.019 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
<del>n-heptane</del>	<del>32,000</del>	<del>15,238</del>	<del>---</del>
<del>cyclohexane</del>	<del>1,000</del>	<del>238</del>	<del>---</del>
<del>cyclohexylmethane</del>	<del>32,000</del>	<del>7,619</del>	<del>---</del>
toluene	--	--	2,000-300
benzene	--	--	0.123
<del>stoddard solvent</del>	<del>5,250</del>	<del>1,250</del>	<del>---</del>

Odor None Objectionable

**PERMITTEE:**

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

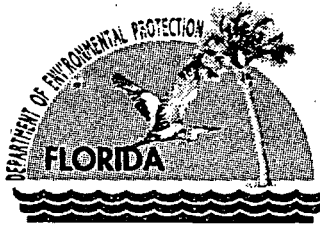
I.D. Number: 31GVL01004601  
Permit/Cert: AO01-220792  
Date of Issue: March 19, 1993  
Revised:  
Expiration Date: January 30, 1998

**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>
<del>Module 4</del>	<del>15.9</del>	<del>65.4</del>
<del>Module 5</del>	<del>32.9</del>	<del>135.2</del>
<del>Module 6</del>	<del>32.9</del>	<del>135.2</del>
<del>Module 7</del>	<del>29.8</del>	<del>122.1</del>
<del>Off-line Conversion, Presses</del>	<del>6.4</del>	<del>26.1</del>
Entire Facility	78.0 <del>118</del>	484 <del>319.1</del>

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;



Jeb Bush  
Governor

# Department of Environmental Protection

RECEIVED

MAR 06 2000

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

David B. Struhs  
Secretary

## CERTIFIED - RETURN RECEIPT

February 23, 2000

Mr. Gary V. Bishop, Plant Manager  
Metal Container Corporation  
5909 N. W. 18<sup>th</sup> Drive  
Gainesville, Florida 32653-1690

Dear Mr. Bishop:

PSD-FI-153B

Alachua County - AP  
Metal Container Corporation  
Project No. 0010046-003-AV  
Request for Additional Information Regarding Permit Revision Request

In accordance with Rule 62-213.420(1)(b)2., F.A.C., and Rule 62-4.055(1), F.A.C., the Department has reviewed your letter dated February 3, 2000, and has determined that the following information and questions need to be answered before the application can be further processed.

1. Per the February 17, 2000 telephone conversation between Mr. Alvaro Linero and Ms. Teresa Heron of Florida Department of Environmental Protection and Mr. Robert Lanham of Metal Container Corporation, will you apply for a PSD Synthetic Minor Source? If so, please submit a letter, certified by the responsible official, indicating such a request.
2. At the same time, as stated in previous requests for additional information concerning this project, your request of an increase in the production rate constitutes a modification, and shall be accomplished only through the issuance of an air construction permit pursuant to Rule 62-210.300(1)(b)1., F.A.C. Please complete and submit the appropriate pages of a construction permit application on form number 62-210.900(3) F.A.C.
3. If you will not apply for a PSD Synthetic Minor Source, please explain why the emissions from 1994 and 1995 were chosen as the baseline for the actual emission calculations. In accordance with Rule 62-210.210, F.A.C., **Actual Emissions** as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit.

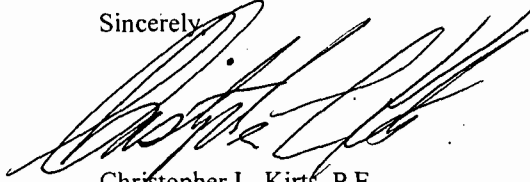
The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

Metal Container Corporation  
Request for Additional Information Regarding Permit Revision Request  
Page two

If you should have any questions, please call Hui Liang at (904) 448-4310, extension.255.

Sincerely,



Christopher L. Kirts, P.E.  
District Air Program Administrator

*CLK*  
CLK:HL

cc: Robert M. Lanham, P. E. – Metal Container Corporation  
Mary S. Mahaffey – Metal Container Corporation  
Thomas W. Davis, P. E. – Environmental Consulting & Technology, Inc.  
Lalit Lalwani, NED – Air, Gainesville Branch Office  
Teresa Heron, – BAR/DARM/NSR



Acid Rain unit at an Acid Rain source, and for the owners, operators and the designated representative of the Acid Rain source or the Acid Rain unit.

(8) "Acid Rain Program or Federal Acid Rain Program" - The national sulfur dioxide and nitrogen oxides air pollution control and emissions reduction program established pursuant to 42 U.S.C. Sections 7651-7651o and 40 CFR Parts 72, 73, 75, 76, 77, and 78, adopted and incorporated by reference in Rule 62-204.800, F.A.C.

(9) "Acid Rain Source" - A Title V source with one or more Acid Rain units.

(10) "Acid Rain Unit" - A fossil fuel-fired combustion device listed as subject to any Acid Rain emissions reduction requirement or Acid Rain emissions limitation at 40 CFR 72.6, adopted and incorporated by reference in Rule 62-204.800, F.A.C.

(11) "Acrylonitrile" - An organic chemical, formula  $C_3H_3N$ , used in the production of various resins, polymers and acrylic fibers. Synonyms for acrylonitrile are: 2- propenitrile, acrylon, acrylonitrile monomer, cyanoethylene, AN, VCN, and vinyl cyanide. The Chemical Abstract Service registration number is 107-13-1.

(12) "Actual Emissions" - The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:

(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

(b) The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that, for any regulated air pollutant, such unit-specific allowable emissions limits are federally enforceable.

(c) For any emissions unit (other than an electric utility steam generating unit specified in subparagraph (d) of this definition) which has not begun normal operations on a particular date, actual emissions shall equal the potential emissions of the emissions unit on that date.

(d) For an electric utility steam generating unit (other than a new unit or the replacement of an existing unit) actual emissions of the unit following a physical or operational change shall equal the representative actual annual emissions of the unit following the physical or operational change, provided the owner or operator maintains and submits to the Department on an annual basis, for a period of 5 years representative of normal post-change operations of the unit, within the period not longer than 10 years following the change, information demonstrating that the physical or operational change did not result in an emissions increase. The definition of

PSD - F1-153B



**Metal Container Corporation**

January 28, 2000

00 FEB 3 PM 1 40

Certified Mail Z 277 871 369

STATE OF FLORIDA  
DEP - NE DISTRICT  
JACKSONVILLE

Mr. Christopher L Kirts, P.E.  
District Air Program Administrator  
Department of Environmental Protection  
Northeast District  
7825 Baymeadows Drive  
Jacksonville, FL 32256-7590

Re: Metal Container Corporation  
Gainesville Lid Plant  
Project No. 0010046-003-AV

Dear Mr. Kirts:

In response to your letter dated October 26, 1999 and received on November 1, 1999, we offer the following response and comments to the questions raised. I will address each question separately and in the order consistent with your questions.

1. As previously stated, the average diameter of the lids we are producing is gradually being reduced. As market demand changes, we will adjust our production to meet customer demands. At this point in time, it is impossible to provide an exact distribution of the specific number of the various diameter lids we will be producing and I would not want that incorporated as a specific permit limit. Therefore, we would request that if a production limit is necessary, we would prefer to simply have a total number for lids.
2. As requested, I have reviewed our actual VOC emissions for the past 5 years. They are as follows:

1994	-	214.62 tons
1995	-	223.21 tons
1996	-	171.46 tons
1997	-	186.41 tons
1998	-	175.42 tons

After discussions with Teresa Heron and following accepted EPA protocol, using 1994 and 1995 as the baseline for our actual emission calculations, the average baseline would be 218.92 tons/year. I have attached two spreadsheets which calculates future potential emissions based on an annual production rate of 12.5 billion lids/year. The future potential emissions under this scenario are 66 pounds/hour and 257 tons/year. This would yield an increase (actual vs. potential) of 38 tons/year. Therefore, PSD would not be applicable in this instance.

Gainesville Lid Plant  
Potential VOC Emissions

1/27/2000

Maximum Hourly Production

1.6 MM lids

Material	Manufacturer	Usage Rate (gal/M lids)	Density (lb/gal)	VOC Content (% by wgt)	Emissions (lbs/hour)
End sealant Compound	Darex SLC 4163-6	0.0115	8.6	36	56.8
Tab Lube	Force Chemical	0.00001	5.56	100	0.1
Clean-up Solvents	Various	0.0009	6.6	100	9.2
Total					66.1

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00 FEB 3 PM 1 40  
STATE OF FLORIDA  
DEP - NE DISTRICT  
JACKSONVILLE

Gainesville Lid Plant  
 Potential VOC Emissions

1/27/2000

Annual Production

12500 MM lids

Material	Manufacturer	Usage Rate (gal/M lids)	Density (lb/gal)	VOC Content (% by wgt)	Emissions (tons/year)
End sealant Compound	Darex SLC 4163-6	0.0115	8.6	36	220.6
Tab Lube	Force Chemical	0.00001	5.56	100	0.4
Clean-up Solvents	Various	0.0009	6.6	100	36.1
Total					257.1

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00 FEB 3 PM 1 40  
 STATE OF FLORIDA  
 DEP - NE DISTRICT  
 JACKSONVILLE


Based upon the preceding, we request that the following conditions of Permit No. 0010046-002-AV be revised as follows:

**A.1. Permitted Capacity. The maximum production rate is 12.5 billion lids per consecutive 12 months.**

**A.6. VOC. Volatile Organic Compound emissions shall not exceed 66 pounds per hour and 257 tons per consecutive 12 months.**

Please contact me at (314) 957-0769 or Mary Mahaffey at (314) 957-0714 with any questions.

Sincerely,  
METAL CONTAINER CORPORATION



Robert M. Lanham, P.E.  
Director, Environmental Engineering  
c:\data\word\gms\psdresp.doc

Attachments

cc: Ms. Teresa Heron - FDEP

To: Ms. Teresa Heron

850. 922. 6979

From: Idui Liang

(904) 448-4363

<b>Metal Container VOC Emission Information</b>				
	Lid Prod. (MM)	Usage(gal/1000)	Total Ann. Emission (TPY)	Hourly Emission (Lbs/hr)
1994	7,705	0.01561	214.62	49.41
1995	8,304	0.01584	222.92	51.32
1996	8,126	0.01265	171.46	40.36
1997	8,746	0.01294	186.41	43.39
1998	9,112	0.01169	175.44	40.61
1999				
projected	12,500	0.01241	256.92	66.1

*Prepared by Hui Fang  
January 4, 2000*



Jeb Bush  
Governor

# Department of Environmental Protection

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

David B. Struhs  
Secretary

## CERTIFIED - RETURN RECEIPT

October 26, 1999

Mr. Gary V. Bishop, Plant Manager  
Metal Container Corporation  
5909 N. W. 18<sup>th</sup> Drive  
Gainesville, Florida 32653-1690

PSD-FI-153B

Dear Mr. Bishop:

Alachua County - AP  
Metal Container Corporation  
Project No. 0010046-003-AV  
Request for Additional Information Regarding Permit Revision Request

In accordance with Rule 62-213.420(1)(b)2., F.A.C., and Rule 62-4.055(1), F.A.C., the Department has reviewed your letter dated October 4, 1999 and has determined that the following information and questions need to be answered before the application can be further processed.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. In the letter, you stated that you are using the same amount of aluminum but producing a greater number of lids. Please provide all the calculations about the aluminum throughputs before and after the production rate increase, and the relevant VOC emissions.
2. Your request of an increase in the production rate, which is included in the Department air construction and air operation permit, is a modification in accordance with Rule 62-210.210, F.A.C., and may trigger the pre-construction review. The 40 tpy PSD significant net emission increase threshold is based on the net difference between the potential VOC emissions from the requested production rate (12.5 billion lids per year) and the current actual emissions (AOR data). Should a PSD permit application be necessary, it should be sent along with the correct processing fee to the attention of Clair Fancy, P.E., Bureau Chief at the Tallahassee Office. For issues concerning PSD applicability determinations and the required information for application submittal, please contact Alvaro Linero at (850) 921-9532 or Teresa Heron at (850) 488-0114, extension 284.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please call Hui Liang at (904) 448-4310, extension 255.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*



Metal Container Corporation  
Request for Additional Information Regarding Permit Revision Request  
Page two

Sincerely,



Christopher L. Kirts, P.E.  
District Air Program Administrator

ldL.  
CLK:HL

- cc: Robert M. Lanham, P. E. – Metal Container Corporation
- Mary S. Mahaffey – Metal Container Corporation
- Thomas W. Davis, P. E. – Environmental Consulting & Technology, Inc.
- Lalit Lalwani, NED – Air, Gainesville Branch Office
- Teresa Heron, – BAR/DARM/NSR

Al Cirro

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION) 3. \_\_\_\_\_  
 1. DARM - MS# 5500 4. Teresa Weron  
 2. \_\_\_\_\_ 5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

- \_\_\_\_ SECRETARY'S SIGNATURE
- \_\_\_\_ DIV/DIST DIR SIGNATURE
- \_\_\_\_ MY SIGNATURE
- \_\_\_\_ YOUR SIGNATURE
- \_\_\_\_ DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

- \_\_\_\_ DISCUSS WITH ME
- COMMENTS/ADVISE
- \_\_\_\_ REVIEW AND RETURN
- \_\_\_\_ SET UP MEETING
- \_\_\_\_ FOR YOUR INFORMATION
- \_\_\_\_ HANDLE APPROPRIATELY
- \_\_\_\_ INITIAL AND FORWARD
- \_\_\_\_ SHARE WITH STAFF
- \_\_\_\_ FOR YOUR FILES

COMMENTS:

Application and additional information for production rate increase from 10,000,000,000 lbs to 12.5 billion lbs, without increasing emission limit.

Their actual emission rate is 175.44 tons/yr. VOC.

John St

RECEIVED

OCT 13 1999

BUREAU OF AIR REGULATION

PSD-FI-153B

FROM: NED - JAX Dereen - AIR DATE: \_\_\_\_\_ PHONE: SC ext 233 880-4310

DEP 15-026 (12/93)

Hui Liang

10/11/99 SC: 880-4310

ext. 255



**Metal Container Corporation**

ONE OF THE ANHEUSER-BUSCH COMPANIES

June 21, 1999

Certified Mail No. P 459 062 772

Christopher L. Kirts, P.E.  
Florida Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

RECEIVED

JUN 23 1999

PSD - FI - 153B

**RE: PERMIT REVISION REQUEST  
FINAL PERMIT NO. 0010046-002-AV  
METAL CONTAINER CORPORATION  
GAINESVILLE, FLORIDA**

Dear Mr. Kirts:

This correspondence serves as a written request for a revision of permit condition A.1 of the Metal Container Corporation (MCC), Gainesville facility Operating Permit (Final Permit No. 0010046-002-AV). The current permit limits the maximum production rate to 10.049 billion lids per consecutive 12 months. Although no construction is planned at the facility, continued increases in operating efficiency have resulted in production increases each year and the actual production level is approaching the permit limit.

MCC requests that condition A.1 of Final Permit No. 0010046-002-AV be revised as follows:

**A.1. Permitted Capacity. The maximum production rate is 12.5 billion lids per consecutive 12 months.**

The facility maintains compliance with the VOC emissions limit through the use of compliant coatings and maintaining appropriate material usage rates. Therefore, an increase in the allowable production rate will not cause the facility to exceed the current VOC emission limit (319 tpy).

If you have any questions, please contact me at (314) 957-0714 or Bob Lanham at (314) 957-0769.

Sincerely,  
METAL CONTAINER CORPORATION

Mary S. Mahaffey



**Metal Container Corporation**

ONE OF THE ANHEUSER-BUSCH COMPANIES

October 4, 1999

Certified Mail No. Z 277 871 499

**RECEIVED**

OCT - 7 1999

Mr. Christopher L Kirts, P.E.  
District Air Program Administrator  
Department of Environmental Protection  
Northeast District  
7825 Baymeadows Drive  
Jacksonville, FL 32256-7590

STATE OF FLORIDA  
DEPT. OF ENV. PROTECTION  
NORTHEAST DISTRICT-JAX

Re: Metal Container Corporation  
Gainesville Lid Plant  
Project No. 0010046-003-AV

Dear Mr. Kirts:

In response to your letter dated July 26, 1999, we offer the following response and comments to the questions raised. I will address each question separately and in the order consistent with your questions. As requested, there is one original and two copies of the requested information.

Handwritten notes on the left margin:  
40  
175  
40  
215  
2019/10/10

1. An application on form number 62-210.900 (1) containing information related to this request is attached.
2. I have attached two spreadsheets which outline the requested increase in the number of lids produced and the associated potential emissions. One spreadsheet outlines potential hourly emissions and the other annual emissions. In both cases, compliance with the current limits (i.e. 78 lbs/hr and 319 tpy) is shown.
3. The requested change is not a "modification" as defined in 62-210.200 and therefore would not trigger a pre-construction review or comparison of actual to potential emissions. A modification is defined as follows under 62-210.200:

"(188) "Modification" -- Any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Act, including any not previously emitted, from any emissions unit or facility.

(a) A physical change or change in the method of operation shall not include:

1. Routine maintenance, repair, or replacement of component parts of an emissions unit; or
2. A change in ownership of an emissions unit or facility.

(b) For any pollutant that is specifically regulated by the EPA under the Clean Air Act, a change in the method of operation shall not include an increase in the hours of operation or in the production rate, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975.

- (c) For any pollutant that is not specifically regulated by the EPA under the Clean Air Act, a change in the method of operation shall not include an increase in the hours of operation or in the production rate, unless such change would exceed any restriction on hours of operation or production rate included in any applicable Department air construction or air operation permit.”

What we are requesting does not meet any of the criteria as defined in the regulations. We have discussed this issue on several occasions with Teresa Heron and explained that the production number is an arbitrary figure that we expect to increase through efficiencies in our process without making any modifications. In fact there are two reasons why this number needs to be increased at the present time. First, our facility has become more proficient at operating the equipment and has realized a year to year increase in throughput without making any changes to the equipment. Second, and more importantly, since the initial production limit was established the trend by our customers has been to reduce the diameter of the lids that they are using. From an economic standpoint, the smaller the diameter lid reduces the cost of materials. Therefore, from a process throughput standpoint, we are still using the same amount of aluminum but producing a greater number of lids (i.e. more lids per pound of aluminum throughput). The associated amount of end sealant used per lid is also reduced since the circumference is smaller. The trend toward smaller diameter lids should continue to some degree in the future, so inherently we will be making even a greater number of lids without an increase in the amount (pounds) of aluminum throughput.

4. The Responsible Official (R.O.) certification statement as required by Rule 62-213.420(4) is attached.
5. The Professional Engineer (P.E.) certification statement as required by Rule 62-4.050(3) is attached.

Based upon the preceding explanations, we request that condition A.1 of Permit No. 0010046-002-AV be revised to include a maximum production rate of 12.5 billion lids per consecutive 12 month period. If this production limit needs to be changed to a different method of measure (e.g. aluminum throughput) to ensure that the original permit conditions are intact, we will be happy to work with you to establish a corresponding value.

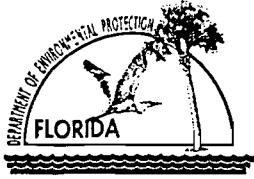
Please contact me at (314) 957-0769 or Mary Mahaffey at (314) 957-0714 with any questions.

Sincerely,  
METAL CONTAINER CORPORATION



Robert M. Lanham, P.E.  
Director, Environmental Engineering  
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**bcc:** Gary Bishop  
Jon Ridner  
Mary Mahaffey  
Jules Budd  
Bob Kreutz



# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

RECEIVED

#### I. APPLICATION INFORMATION

OCT - 7 1999

#### Identification of Facility

1. Facility Owner/Company Name: Metal Container Corporation		STATE OF FLORIDA DEPT. OF ENV. PROTECTION NORTHEAST DISTRICT-JAX
2. Site Name: Gainesville Lid Plant		
3. Facility Identification Number: 31GVL010046 <span style="float: right;">[ ] Unknown</span>		
4. Facility Location: Street Address or Other Locator: 5909 N.W. 18 <sup>th</sup> Drive City: Gainesville                      County: Aluchua                      Zip Code: 32653-1690		
5. Relocatable Facility? [ ] Yes      [X] No	6. Existing Permitted Facility? [X] Yes      [ ] No	

#### Application Contact

1. Name and Title of Application Contact:  Robert M. Lanham; Director, Environmental Engineering
2. Application Contact Mailing Address: Organization/Firm: Metal Container Corporation Street Address: 3636 South Geyer Road City: St. Louis                      State: MO                      Zip Code: 63127
3. Application Contact Telephone Numbers: Telephone: (314 )957 -0769                      Fax: (314 )957 -0719

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit 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: \_\_\_\_\_

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

Current construction permit number: \_\_\_\_\_

Operation permit number to be revised: \_\_\_\_\_

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: \_\_\_\_\_

- Title V air operation permit revision 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 number to be revised: 0010046-002-AV

Reason for revision: To increase the permitted capacity to 12.5 billion

**Air Construction Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

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



**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: Gary V. Bishop
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Metal Container Corporation Street Address: 5909 N.W. 18 <sup>th</sup> Drive City: Gainesville State: Florida Zip Code: 32653-1690
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (352 )378-8800 Fax: (352 )378 -1281
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ ], if so) 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. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained 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. 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: <u>Gary V. Bishop</u> Date: <u>9-29-99</u>

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: Robert George Kreutz Registration Number: PE 43079
2. Professional Engineer Mailing Address: Organization/Firm: Anheuser-Busch Companies Street Address: One Busch Place (124-1) City: St. Louis State: Missouri Zip Code: 63118
3. Professional Engineer Telephone Numbers: Telephone: (314 )577 -2000 Fax: (314 )577 -7757

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 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; and*

*(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.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify 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.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that 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.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further 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.*

*Robert George Harty*  
Signature

*9/24/99*  
Date

(seal)

\* Attach any exception to certification statement.

**Scope of Application**

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	All production-related activities, including shell presses, end liner, conversion presses, and cleanup activities	NA	NA

**Application Processing Fee**

Check one:  Attached - Amount: \$\_\_\_\_\_  Not Applicable

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

NA

2. Projected or Actual Date of Commencement of Construction:

3. Projected Date of Completion of Construction:

**Application Comment**

**Refer to cover letter.**

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:	12.5 billion lids per year	
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

Gainesville Lid Plant  
 Potential VOC Emissions

9/28/99

Annual Production

12500 MM lids

Material	Manufacturer	Usage Rate (gal/M lids)	Density (lb/gal)	VOC Content (% by wgt)	Emissions (tons/year)
End sealant Compound	Darex SLC 4163-6	0.0143	8.6	36	276.1
Tab Lube	Force Chemical	0.00003	5.56	100	1.0
Clean-up Solvents	Various	0.0010	6.6	100	41.3

Total 318.4

0.01533 ✓

175.46

0.013

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Gainesville Lid Plant  
Potential VOC Emissions

9/28/99

Maximum Hourly Production

1.532 MM lids

Material	Manufacturer	Usage Rate (gal/M lids)	Density (lb/gal)	VOC Content (% by wgt)	Emissions (lbs/hour)
End sealant Compound	Darex SLC 4163-6	0.0143	8.6	36	67.7
Tab Lube	Force Chemical	0.00003	5.56	100	0.3
Clean-up Solvents	Various	0.0010	6.6	100	10.1
Total					78.0

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gainesville Office

5700 Southwest 34 Street, Suite 1204

Phone 352/955-2095

N.E District

904/448-4300



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have an impact on the Class I area equal to or greater than 1.0 microgram per cubic meter (24-hour average).

2. Except as provided under Rule 62-212.400(2)(f)3., F.A.C., below, for a proposed modification subject to the preconstruction review requirements of this rule pursuant to Rule 62-212.400(2)(d)4., F.A.C., the preconstruction review requirements of this rule shall apply to all pollutants regulated under the Act for which the modification would result in: a significant net emissions increase (as set forth in Rule 62-212.400(2)(e)2., F.A.C., or a net emissions increase (as set forth in Rule 62-212.400(2)(e)1., F.A.C.,) when the facility to be modified is located within 10 kilometers of a Class I area and the net emissions increase would have an impact on the Class I area equal to or greater than 1.0 microgram per cubic meter (24-hour average).

3. For a proposed new facility or modification subject to the preconstruction review requirements of this rule which would construct in an area designated as nonattainment for any pollutant other than ozone under Rule 62-204.340, F.A.C., the preconstruction review requirements of this rule shall not apply to emissions of the affected pollutant. For a proposed new facility or modification subject to the preconstruction review requirements of this rule which would construct in an ozone nonattainment area, the preconstruction review requirements of this rule shall not apply to emissions of volatile organic compounds; however, in such case the preconstruction review requirements of this rule shall apply to emissions of nitrogen oxides, even if the proposed new facility or modification would also be subject to the preconstruction review requirements of Rule 62-212.500, F.A.C., for nitrogen oxides.

(g) Relaxations of Restrictions on Pollutant Emitting Capacity. If a previously permitted facility or modification becomes a facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it.

(3) Limited Exemptions and Special Provisions. The provisions of this subsection establish exemptions and exclusions from certain of the General Provisions of Rule 62-212.400(4), F.A.C., and PSD Review Requirements of Rule 62-212.400(5), F.A.C.

(a) Relocatable Facilities. A relocatable facility which has a valid Department operation permit and which has previously been reviewed and issued a construction permit pursuant to 40 CFR 52.21 or to the preconstruction review requirements of this rule shall obtain permission to relocate and operate such facility at a new location through an amendment to the facility's operation permit, provided the following conditions are met:

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

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

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

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Gary V. Bishop, Plant Mgr  
 Metal Container Corp  
 5909-NW 18th Dr  
 Gainesville, FL 32606

4a. Article Number  
 2392 979 028

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

7. Date of Delivery  
 8/26/95

5. Signature (Addressee)  
 [Signature]

6. Signature (Agent)  
 [Signature]

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

Thank you for using Return Receipt Service.

2 392 979 028



**Receipt for Certified Mail**

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

PS Form 3800, March 1993

Sent to	Gary Bishop
Street and No.	Metal Container
City, State and ZIP Code	Gainesville, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark, or, Date	8-24-95
AC01-265409	
PSO-FI-153A	

STATE OF FLORIDA  
COUNTY OF ALACHUA

Before the undersigned authority personally appeared Naomi Williams Jordan

who on oath says that he/she is Assistant Classified Mgr. of THE GAINESVILLE SUN, a daily newspaper published at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a Notice of Intent

in the matter of .....  
in the ..... Court, was published in said newspaper in the issue of, .....  
July 11, ..... 1995.....

Affiant further says that the said THE GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said Alachua County, each day, and has been entered as second class mail matter at the post office in Gainesville, in said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount for publication in the said newspaper.

Sworn to and subscribed before me this

11 day of July, D. 1995  
Martha A. Pattison  
(Seal) Notary Public



Naomi Williams-Jordan

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may differ from the position taken in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the rules specified above and be filed (received) within 14 days of publication of this Notice in the Office of General Counsel at the above address of the Department. Failure to file a 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 be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at: Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301

Department of Environmental Protection, Northeast District Office, 5700 Southwest 34th Street, Suite 204, Gainesville, Florida 32605

Any person may send written comments on the proposed action to Administrator, New Source Review at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 9505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 30 days of the publication of this Notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person whose request must be submitted within 30 days of this Notice. (9924) 7:11

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT  
AC 01-265408  
PSD-FL-153A

The Department of Environmental Protection gives notice of its intent to issue a 01-265408 permit, No. AC 01-265408, to Petal Container Corporation, 5095 Northwest 18th Drive, Gainesville, Alachua County, Florida, 32605, for the modification of the Gainesville Lid plant. The modification consists of a switch to a new sealant used to attach lids to aluminum cans. Allowable emissions of volatile organic compounds per year (TPY) from present limit of 464 TPY from present permit will be reduced to low volatility solvents and sealants. The new sealant is less toxic and less is required due to a trend toward smaller lids.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301, within 14 days of publication of this Notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative hearing under Section 120.57, F.S.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner; (b) the applicant's name and address; the Department file number and the County in which the project is proposed; (c) A statement of how and when each petitioner received notice of the Department's action or proposed action; (d) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (e) A statement of material facts disputed by the petitioner; (f) A statement of fact upon which the petitioner contends warrant reversal or modification of the Department's action or proposed action; (g) A statement of which rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; (h) A statement of the relief requested by the petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

Z 392 979 042



**Receipt for Certified Mail**

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

PS Form 3800, March 1993

Sent to <i>Gary Bishop</i>	
Street and No. <i>Metal Container</i>	
P.O., State, and ZIP Code <i>Gainesville, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>AC 01-265409 7-6-95</i> <i>PSO-FI-153A</i>	

no green card  
as of 12-18-95  
KWW  
per Patty Adams

Z 311 902 931



**Receipt for  
Certified Mail**

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

PS Form 3800, March 1993

Sent to	Dean Pusch	
Sheet and No.	Cinheuser Busch	
P.O., State and ZIP Code	St. Louis, MO	
Postage		\$
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, and Addressee's Address		
TOTAL Postage & Fees		\$
Postmark or Date	5-9-95	
	AC01-265409	
	PSD-FI-153	

no green card  
 as of 12-18-95  
 KKW  
 per Patty Adams

Z 311 902 949



**Receipt for  
 Certified Mail**

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

PS Form 3800, March 1993

Sent to <i>Robert H. Lanham</i>	
Street and No. <i>Omheuser Busch</i>	
P.O., State and ZIP Code <i>St. Louis, MO</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>3-10-95</i>
<i>AC 01-185835</i>	
<i>PSD-F1-153</i>	

Check Sheet

Company Name: Metal Container Corporation  
Permit Number: AC 01-265409  
PSD Number: PSD PL-153A  
Permit Engineer: \_\_\_\_\_

**Application:**

- |  |                          |
|--|--------------------------|
| <input checked="" type="checkbox"/> Initial Application    | Cross References:        |
| <input checked="" type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Responses              | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action       | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response               |                          |
| <input type="checkbox"/> Other                             |                          |

**Intent:**

- Intent to Issue
  - Notice of Intent to Issue
  - Technical Evaluation
  - BACT or LAER Determination
  - Unsigned Permit
- Correspondence with:
- EPA
  - Park Services
  - Other
- Proof of Publication
  - Petitions - (Related to extensions, hearings, etc.)
  - Waiver of Department Action
  - Other

**Final**

**Determination:**

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other

BEST AVAILABLE COPY

PATS03 265409

APPLICATION TRACKING SYSTEM CLOCK INFORMATION

10/25/95

APPLICATION NUMBER:265409

APPLICATION TYPE:AC

A DATE APPLICATION WAS RECEIVED - - - - - 02/15/95

B DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - - - \_\_\_/\_\_\_/\_\_\_

C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - - \_\_\_/\_\_\_/\_\_\_--\_\_\_/\_\_\_/\_\_\_

E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - 03/10/95--03/21/95

E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - 04/13/95--05/15/95

E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - \_\_\_/\_\_\_/\_\_\_--\_\_\_/\_\_\_/\_\_\_

E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - \_\_\_/\_\_\_/\_\_\_--\_\_\_/\_\_\_/\_\_\_

E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - \_\_\_/\_\_\_/\_\_\_--\_\_\_/\_\_\_/\_\_\_

E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - \_\_\_/\_\_\_/\_\_\_--\_\_\_/\_\_\_/\_\_\_

F DATE LAST 45 DAY LETTER WAS SENT - - - - - \_\_\_/\_\_\_/\_\_\_

G DATE FIELD REPORT WAS REQ--REC - - - - - \_\_\_/\_\_\_/\_\_\_--\_\_\_/\_\_\_/\_\_\_

H DATE DNR REVIEW WAS COMPLETED - - - - - \_\_\_/\_\_\_/\_\_\_

I DATE APPLICATION WAS COMPLETE - - - - - 05/15/95

K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - - 07/06/95--\_\_\_/\_\_\_/\_\_\_

L DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - - - 07/06/95

M DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - - - - 07/19/95

N WAIVER BEGIN DATE--END DATE (DAY 90) - - - - - \_\_\_/\_\_\_/\_\_\_--\_\_\_/\_\_\_/\_\_\_

TAB TO HERE: \_