



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

NOTICE OF PERMIT

CERTIFIED-RETURN RECEIPT

September 01, 2000

RECEIVED

SEP 11 2000

BUREAU OF AIR REGULATION

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

Dear Mr. Bishop:

Alachua County - AP
Metal Container Corporation
Permit Modification of AC01-265409/PSD-FL-153A
AIRS ID Number: 0010046

Enclosed is Permit Number 0010046-004-AC to construct the subject air pollution emissions unit(s), issued pursuant to Section 403.087, Florida Statutes (FS).

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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

bh
CLK: HL

cc: Office of General Counsel - Air Permitting
Robert George Kreutz, P. E. - Anheuser-Busch Companies
Robert M. Lanham, P. E. - Metal Container Corporation
Lalit Lalwani, NED - Air, GBO
Teresa Heron, - BAR/DARM/NSR

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.
Dorothy Benefield 9/7/00
Clerk Date

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

PERMITTEE:

Metal Container Corporation
5909 N. W. 18th Drive
Gainesville, Florida 32653-1690

I.D. Number: 0010046
Permit/Cert Number: 0010046-004-AC
Date of Issue: September 01, 2000
Expiration Date: March 01, 2001
County: Alachua
Latitude/Longitude: 29° 42' 05" N; 82°20'53" W
UTM: E-(17) 369.4; N-3287.2
Project: Permit Modification of
AC01-265409/PSD-FL-153A

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the modification of permit No. AC01-265409/PSD-FL-153A to reclassify this facility as a PSD Synthetic Minor Source by limiting annual VOC emission to 249 tons. This modification is also to remove the production rate limitations from permit, as well as references to the Florida Ambient Reference Concentrations (FARCs) per Department Guidance Memo No. DARM-PER-28.

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

In accordance with:

Air Construction Permit AC01-265409/PSD-FL-153A
Permit Revision Request received 06-28-1999
Request for Additional Information dated 07-26-1999, 10-26-1999 and 02-23-2000
Application for Permit Modification received 10-07-1999
Additional information received 02-03-2000, 05-09-2000 and 06-02-2000

"More Protection, Less Process"

Printed on recycled paper.

PERMITTEE:

Metal Container Corporation
5909 N. W. 18th Drive
Gainesville, Florida 32653-1690

I.D. Number: 0010046
Permit/Cert Number: 0010046-004-AC
Date of Issue: September 01, 2000
Expiration Date: March 01, 2001

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, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the 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), Florida Statutes, 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 not 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 no 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 permitted to cause pollution in contravention of Florida Statutes 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 and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law 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 record 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.

PERMITTEE:

Metal Container Corporation
5909 N. W. 18th Drive
Gainesville, Florida 32653-1690

I.D. Number: 0010046
Permit/Cert Number: 0010046-004-AC
Date of Issue: September 01, 2000
Expiration Date: March 01, 2001

GENERAL CONDITIONS:

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 non-compliance, 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 Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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:

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

PERMITTEE:

Metal Container Corporation
5909 N. W. 18th Drive
Gainesville, Florida 32653-1690

I.D. Number: 0010046
Permit/Cert Number: 0010046-004-AC
Date of Issue: September 01, 2000
Expiration Date: March 01, 2001

GENERAL CONDITIONS:

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 measurement;
 - 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.

PERMITTEE:

Metal Container Corporation
5909 N. W. 18th Drive
Gainesville, Florida 32653-1690

I.D. Number: 0010046
Permit/Cert Number: 0010046-004-AC
Date of Issue: September 01, 2000
Expiration Date: March 01, 2001

SPECIFIC CONDITIONS:

1. The ID Number and Project Name for this source shall be used on all correspondences.
2. The Permittee shall not use coatings with a VOC content greater than those listed below:

Material	VOC Content (pounds VOC/Gallon)
End Sealant	3.5 (excluding water)
Tab Lube	6.0 (excluding water)
Cleanup Solvents	6.6

[Air Construction Permit AC01-265409/PSD-FL-153A]

3. This emission unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; Air Construction Permit AC01-265409/PSD-FL-153A]
4. Total Volatile Organic Compound emissions at this facility shall not exceed 249 tons per consecutive 12 months.
[Applicant request dated 06-02-2000]
5. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants that cause or contribute to an objectionable odor from this emission unit.
[Air Construction Permit AC01-265409/PSD-FL-153A.]
6. Compliance with the VOC content of each coating stated in Specific Condition No.2., shall be determined by either EPA Method 24 or 24A as described in 40 CFR 60 Appendix A and adopted by reference in Rule 62-297, F.A.C. The methods outlined in EPA Document EPA 450/3-84-019 may be used to determine compliance in lieu of the Method 24 or 24A tests.
[Air Construction Permit AC01-265409/PSD-FL-153A.]
7. New coatings or those supplied by another manufacturer shall be tested via the methods stated in Specific condition No.6. prior to initial use in production.
[Air Construction Permit AC01-265409/PSD-FL-153A.]
8. Each coating shall be tested after dilution with the maximum amount of solvent used by the permittee for production.
[Air Construction Permit AC01-265409/PSD-FL-153A.]
9. The permittee shall maintain a record of the clean-up solvents used at the facility on a twelve-month basis.
[Air Construction Permit AC01-265409/PSD-FL-153A.]
10. The Permittee shall provide prior written notification to the Northeast District Office of the proposed use of any coating or solvent that was not included in the AC01-265409 permit application with a VOC content greater than that is permitted. The notification shall include the VOC content test results as outlined in Specific Condition No.6.
[Air Construction Permit AC01-265409/PSD-FL-153A.]
11. Material Safety and Data Sheets shall be maintained for all materials that are used by the facility.
[Air Construction Permit AC01-265409/PSD-FL-153A.]

PERMITTEE:

Metal Container Corporation
5909 N. W. 18th Drive
Gainesville, Florida 32653-1690

I.D. Number: 0010046
Permit/Cert Number: 0010046-004-AC
Date of Issue: September 01, 2000
Expiration Date: March 01, 2001

SPECIFIC CONDITIONS:

- 12. Compliance shall be determined by recording VOC emissions in lb/month and ton/yr for each material used that contains VOC. This shall be based on material balance reports.
- 13. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to the air compliance section of this office. The report shall also include the following at a minimum:
 - Material balance reports
 - Quantity of lids processed by the facility
 - VOC emissions [lb/month and ton/yr]
 - Manufacturer's certification of VOC content of coating
 - Coating and solvent usage records
 - Hours of operation
 - Compliance test results [VOC content of dilution]
[Air Construction Permit AC01-265409/PSD-FL-153A.]
- 14. A report of the data required by Specific Condition No.12. shall be submitted to the Northeast District Branch Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

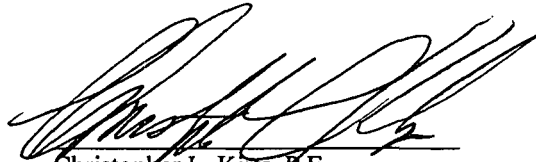
Reporting Period	Report Due Date
January - March	May 15
April - June	August 15
July - September	November 15
October - December	March 1 ¹

¹The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report. The fourth quarterly report shall be due on March 1, 1999 (Same date as the AOR).
[Rules 62-4.070(3) and 62-213.440, F.A.C.]

- 15. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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

FILING AND ACKNOWLEDGEMENT
 FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.
Dorothy Benefield 9/7/00
 Clerk Date

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. DARM - MS# 5500

2. Teresa Heron

3. _____

4. _____

5. _____

PLEASE PREPARE REPLY FOR:

____ SECRETARY'S SIGNATURE

____ DIV/DIST DIR SIGNATURE

____ MY SIGNATURE

____ YOUR SIGNATURE

____ DUE DATE _____

COMMENTS:

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

File
PSD-#1-153A

FROM: NED - JAX
Deven - AIR

DATE: _____

SC ext 233
PHONE: 880-4310



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 05, 2000

RECEIVED

SEP 11 2000

BUREAU OF AIR REGULATION

CERTIFIED - RETURN RECEIPT

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

Re: PROPOSED Revision of Title V Air Operation Permit No.: 0010046-002-AV, Project 003
Gainesville Lid Plant

Dear Mr. Bishop:

One copy of the "PROPOSED PERMIT DETERMINATION" for Metal Container Corporation at Gainesville Lid Plant located at 5909 N.W. 18th Drive, Gainesville, Alachua County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit revision has become a PROPOSED permit revision.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Hui Liang at (904)- 448-4310, extension 238.

Sincerely,

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

CLK:HL
Enclosures

Copy furnished to:
Robert George Kreutz, P. E. – Anheuser-Busch Companies
Robert M. Lanham, P. E. – Metal Container Corporation
Lalit Lalwani, NED – Air, GBO
Teresa Heron, – BAR/DARM/NSR
Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Gracy Danois, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Barbara Boutwell, Bureau of Air Regulation (E-mail)

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PROPOSED PERMIT DETERMINATION

PROPOSED Revision of Title V Permit No.: 0010046-002-AV

Project 003

Page 1 of 1

I. Public Notice.

An "INTENT TO ISSUE A AIR CONSTRUCTION PERMIT and A TITLE V OPERATION PERMIT REVISION" to Metal Container Corporation at Gainesville Lid Plant located at 5909 N.W. 18th Drive, Gainesville, Alachua County was clerked on July 13, 2000. The "PUBLIC NOTICE OF INTENT TO ISSUE A AIR CONSTRUCTION PERMIT and A TITLE V OPERATION PERMIT REVISION" was published in the GAINESVILLE SUN on July 26, 2000. The DRAFT Revision of the Title V Air Operation Permit was available for public inspection at the Northeast District Office in Jacksonville. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A AIR CONSTRUCTION PERMIT and A TITLE V OPERATION PERMIT REVISION" was received on July 31, 2000.

II. Public Comment(s).

Comments were received and the DRAFT Revision of the Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Revision of the Title V Permit and require another Public Notice.

A. Letter from Mary Mahaffey, Metal Container Corporation, dated August 21, 2000.

As a result of the comments, the description about the immersion cleaning system has been removed from the permit since it is no longer used by the facility.

The facility had also requested that the proposed quarterly reporting to demonstrate compliance with the 249 tons per year VOC emissions limit, be reduced to a semi-annual frequency instead. Based on guidance from the Division of Air Resources Management (DARM), the Department has determined the quarterly reporting requirement appropriate.

The facility had also requested the use of another method of determining the VOC content of the coating used by the facility instead of the previously permitted options of either EPA Method 24/24A or the methods stated in EPA Document EPA 450/3-84-019. The facility proposed the use of VOC content data provided by the manufacturer that would be based on product formulation or analysis. Based on guidance from the EPA and the Emission Monitoring Group in Tallahassee, either the facility or the manufacturer would need to use EPA Method 24/24A for the determination of compliance. Since generally, the facility does not have such documentation from the manufacturer, the Department believes the current requirement for the facility to use these methods (EPA Method 24/24A or that in EPA Document EPA 450/3-84-019) is appropriate.

The enclosed PROPOSED Revision of the Title V Air Operation Permit includes the aforementioned change to the DRAFT Revision of the Title V Air Operation Permit.

Document(s) on file with the permitting authority:

A. Letter from Mary Mahaffey, Metal Container Corporation, dated August 21, 2000.

III. Conclusion.

The permitting authority hereby issues the PROPOSED Revision of the Permit No.: 0010046-002-AV, with any change noted above.

PROPOSED Permit Electronic Posting Courtesy Notification

**Metal Container Corporation, Inc.
Gainesville Lid Plant
Facility ID No.: 0010046
Alachua County**

**Title V Air Operation Permit
Proposed Revision of Permit No.: 0010046-002-AV**

The electronic version of the PROPOSED permit revision was posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review on September 05, 2000.

USEPA's review period ends on the 45th day after the permit posting date. Day 45 is October 20, 2000. If an objection (veto) is received from USEPA, the permitting authority will provide a copy of the objection to the applicant.

Provided an objection is not received from USEPA, the PROPOSED permit will become a FINAL permit by operation of law on the 55th day after the permit posting date. Day 55 is October 30, 2000.

The web site address is <http://www2.dep.state.fl.us/air>.

Metal Container Corporation, Inc.
Gainesville Lid Plant

Facility ID No.: 0010046
Alachua County

Title V Air Operation Permit
Proposed Revision of Permit No.: 0010046-002-AV

Project Description:

Project No. 003, Permit Revision to Limit
Annual VOC Emissions to 249 Tons

Permitting Authority:

Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: 904/448-4310
Fax: 904/448-4363

Compliance Authority:

Department of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, Florida 32607-1609
Telephone: 352/333-2850
Fax: 352/333-2856

Title V Air Operation Permit
Proposed Revision of Permit No.: 0010046-002-AV
Project No. 003

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Permittee:
Metal Container Corporation

PROPOSED Revision of
Permit No.: 0010046-002-AV
Facility ID No.: 0010046
SIC Nos.: 34
Project: Revise Title V Air Operation Permit to
Limit Annual VOC Emissions to 249 tons

This permit is for the operation of the air sources at Metal Container Corporation., Gainesville Lid Plant. This facility is located at 5909 N.W. 18th Drive, Gainesville, Alachua County, Florida; UTM Coordinates: Zone 17, 369.4 km East and 3287.2 km North; Latitude: 29° 42' 05" North and Longitude: 82°20'53" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

~~APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)~~

APPENDIX TV-3, TITLE V CONDITIONS (version dated 4/30/99)

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Effective Date: April 13, 1998

Revision Date: _____ *

Renewal Application Due Date: February 13, 2003

Expiration Date: April 13, 2003

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

CLK: HL

* To be inserted upon FINAL issuance

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Section I. Facility Information

Subsection A. Facility Description.

Metal Container Corporation manufactures lids that are used for beverage cans. The Gainesville Lid Plant consists of shell presses, end liners, conversion presses, scrap cyclones, and ancillary support equipment used in the manufacturing beverage lids.

Aluminum coil stock is punched and pressed into "shells". These shell rims are then curled and formed in the shell presses. End sealant compound is injected/applied into the curl to ensure that an adequate seal between the lid and can will be formed. Finishing steps occur at the conversion press. These steps include incising, scoring of the opening, tab fabrication and riveting of the finished tabs to the incised and scored ends.

The facility also utilizes a solvent (heptane) for cleaning metal surfaces during routine maintenance operations ~~and (1) immersion cleaning system for cleaning production line die sets.~~ All solvent receptacles are equipped with covers that remain closed when not in use. ~~The immersion system has a liquid capacity of 200 gallons and uses mineral spirits as the cleaning solvent. One of the cold parts cleaning washers used mineral spirits as the solvent and the other uses heptane.~~ The facility has installed a solvent recovery distillation unit to purify heptane recovered from the manufacturing process.

A 7,000 gallon bulk storage tank and a 500 gallon day tank are used to store lid "End Sealant" compound. Both tanks are vented to the atmosphere.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
-001	All production-related activities, including shell presses, end liner, conversion presses, and cleanup activities.

~~Equipment/Activities Regulated Under Clean Air Act Title VI:~~

E.U. ID No.	Brief Description
-002	Shell Press Chilled Water System: (2) units with a 50 pound refrigerant charge.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Title V Air Operation Permit 0010046-002-AV

Permit Revision Request received 06-28-1999

Additional Information Request dated 07-26-1999, 10-26-1999 and 02-23-2000

Application for Permit Revision received 10-07-1999

Additional Information received 02-03-2000, 05-09-2000 and 06-02-2000

Letter from Mary Mahaffey received 08-25-2000

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX ~~IV-1~~ TV-3, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX ~~IV-1~~ TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. [Not federally enforceable.] General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
- ~~4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:~~
 - ~~a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and~~
 - ~~b. certification forms and/or RMPs according to the promulgated rule schedule.~~
4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable ; and
 - b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
6. Not federally enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. At a minimum, the following procedures shall be followed to minimize pollutant emissions:
 - Maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.

- Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC so that it can be covered when not in use
- All fittings, valves, lines, etc., shall be properly maintained

All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rule 62-296.320(1)(a), F.A.C.; Air Construction permit AC01-265409/PSD-FL-153A]

7. [Not federally enforceable.] Reasonable precautions to prevent emissions of unconfined particulate matter at this facility are stated as follows:

Emissions Source Operations	Description & Control Measures
Vehicular traffic on paved roads.	_____
Wind-blown dust from yard areas.	Chemical or water application to unpaved yard areas. Paving and maintenance of roads, parking areas and yards. Landscaping or planting of vegetation. Other techniques, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the Title V permit application additional submittal received November 13, 1997.]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District Branch Office, Air Section:

Department of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, Florida 32607-1609
Telephone: 352/333-2850
Fax: 352/333-2856

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
~~Operating Permits Section~~
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
~~Telephone: 404/562-9099~~
~~Fax: 404/562-9095~~
Telephone: 404/562-9155, Fax: 404/562-9164

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U.

ID No. Brief Description

001 Lid Module Nos. 1, 2, & 3 and Off-line Conversion Presses

Emission Unit 001 identifies Lid Module Nos. 1, 2, & 3, and Off-line Conversion Presses. Cleanup activities, including ~~the operation of the immersion system for production die sets,~~ maintenance solvent cleaning, the solvent recovery distillation unit, and the two end seal compound storage tanks. Process emissions associated with these activities are emitted to the atmosphere through the general building ventilation system that consists of a series of building stacks and vents.

This emissions unit is regulated in accordance with FAC Rule 62-212.400, Prevention of Significant Deterioration, which required a BACT determination approved August 23, 1995.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

~~A.1. Permitted Capacity. The maximum production rate is 10.049 billion lids per consecutive 12 months.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Air Construction Permit AC01-265409/PSD-FL-153A]~~

~~A.2. Permitted Capacity - Maximum usage Rate. A maximum usage rate of all coatings and solvents shall not exceed 0.019 gallons per 1000 lids.
[Rule 62-213.410, F.A.C.; Air Construction permit AC01-265409/PSD-FL-153A]~~

A.1. Methods of Operation. VOC Content. The maximum VOC content of the coatings and solvents shall not exceed the following:

Material	VOC Content (pounds VOC/Gallon)
End Sealant	3.5 (excluding water)
Tab Lube	6.0 (excluding water)
Mineral Spirits	6.32
Heptane	5.84
Cleanup Solvents	<u>6.6</u>

[Air Construction permit AC01-265409/PSD-FL-153A]

A.2. The Permittee shall not use coatings with a VOC content greater than those stated in Specific Condition A.1.

[Air Construction permit AC01-265409/PSD-FL-153A.]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.; Air Construction permit AC01-265409/PSD-FL-153A]

Emission Limitations and Standards

Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

A.4. VOC. Volatile Organic Compound emissions shall not exceed ~~78 pounds per hour and 319 tons~~ 249 tons per consecutive 12 months.

[Air Construction permit AC01-265409/PSD-FL-153A.]

A.5. Odor. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants that cause or contribute to an objectionable odor from this emissions unit.

[Air Construction permit AC01-265409/PSD-FL-153A.]

~~**A.8. Ambient Reference Concentrations.** The ambient reference concentrations levels for the following pollutants shall not be exceeded:~~

Pollutant	Ambient Reference Concentrations (ug/m3)		
	8-hour	24-hour	Annual
n-hexane	1,760	419	200
Toluene	1,880	448	400
Benzene	30	7	0.12

~~[Air Construction permit AC01-265409/PSD-FL-153A.]~~

Monitoring of Operations

A.6. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

A.7. VOC Content. Compliance with the VOC content of each coating stated in Specific Condition A.1., shall be determined by either EPA Method 24 or 24A as described in 40 CFR 60 Appendix A and adopted by reference in Rule 62-297, F.A.C. The methods outlined in EPA Document EPA 450/3-84-019 may be used to determine compliance in lieu of the Method 24 or 24A tests.

[Air Construction permit AC01-265409/PSD-FL-153A.]

A.8. New coatings or those supplied by another manufacturer shall be tested via the methods stated in Specific condition A.7. prior to initial use in production.

[Air Construction permit AC01-265409/PSD-FL-153A.]

A.9. Each coating shall be tested after dilution with the maximum amount of solvent used by the permittee for production.

[Air Construction permit AC01-265409/PSD-FL-153A.]

~~A.13. Compliance with ambient reference concentrations stated in Specific Condition A.8. shall be demonstrated with calculations based on actual operating conditions. These calculations shall be certified by a Professional Engineer registered in the State of Florida.~~

Recordkeeping and Reporting Requirements

A.10. The Permittee shall provide prior written notification to the Northeast District Office of the proposed use of any coating or solvent that was not included in the AC01-265409 permit application with a VOC content greater than that is permitted. The notification shall include the VOC content test results as outlined in Specific Condition A.7.

[Air Construction permit AC01-265409/PSD-FL-153A.]

A.11. Material Safety and Data Sheets shall be maintained for all materials that are used by the facility.

[Air Construction permit AC01-265409/PSD-FL-153A.]

A.12. The permittee shall maintain a record of the clean-up solvents used at the facility on a twelve-month basis.

[Air Construction permit AC01-265409/PSD-FL-153A.]

A.13. Compliance shall be determined by recording VOC emissions in ~~lb/hr (monthly average), lb/day (monthly average),~~ lb/month and ton/yr for each material used that contains VOC. This shall be based on material balance reports.

A.14. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following calendar year and submitted to the air compliance section of this office. The report shall also include the following at a minimum:

- Material balance reports
- Quantity of lids processed by the facility
- VOC emissions [lb/month and ton/yr]
- Manufacturer's certification of VOC content of coating
- Coating and solvent usage records
- Hours of operation
- Compliance test results [VOC content of dilution]

[Rule 62-210.370(3), F.A.C.; Air Construction permit AC01-265409/PSD-FL-153A]

A.15. A report of the data required by Specific Condition A.13. shall be submitted to the Northeast District Branch Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

<u>Reporting Period</u>	<u>Report Due Date</u>
<u>January - March</u>	<u>May 15</u>
<u>April - June</u>	<u>August 15</u>
<u>July - September</u>	<u>November 15</u>
<u>October - December</u>	<u>March 1¹</u>

¹The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report. The fourth quarterly report shall be due on March 1 of the following calendar year (Same date as the AOR).

[Rules 62-4.070(3); 62-213.440, F.A.C.; Air Construction Permit 0010046-004-AC]

STATEMENT OF BASIS

Metal Container Corporation
Gainesville Lid Plant
Facility ID No.: 0010046
Alachua County

Title V Air Operation Permit
Proposed Revision of Permit No.: 0010046-002-AV

Project Description:

Project No. 003, Permit Revision to Limit
Annual VOC Emissions to 249 Tons

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Metal Container Corporation manufactures lids that are used for beverage cans. The Gainesville Lid Plant consists of shell presses, end liners, conversion presses, scrap cyclones, and ancillary support equipment used in the manufacturing beverage lids.

Aluminum coil stock is punched and pressed into "shells". These shell rims are then curled and formed in the shell presses. End sealant compound is injected/applied into the curl to ensure that an adequate seal between the lid and can will be formed. Finishing steps occur at the conversion press. These steps include incising, scoring of the opening, tab fabrication and riveting of the finished tabs to the incised and scored ends.

The facility also utilizes a solvent (heptane) for cleaning metal surfaces during routine maintenance operations ~~and (1) immersion cleaning system for cleaning production line die sets.~~ All solvent receptacles are equipped with covers that remain closed when not in use. ~~The immersion system has a liquid capacity of 200 gallons and uses mineral spirits as the cleaning solvent.~~ The facility has installed a solvent recovery distillation unit to purify heptane recovered from the manufacturing process.

A 7,000-gallon bulk storage tank and a 500-gallon day tank are used to store lid "end" compound. Both tanks are vented to the atmosphere. Process emissions associated with these activities are emitted to the atmosphere through the general building ventilation system that consists of a series of building stacks and vents. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Project 003 is an amendment to the existing Title V permit, 0010046-002-AV, that became effective on April 13, 1998. On June 28, 1999, the facility requested a permit modification to increase the production rate. The construction permit No. 0190011-004-AC was issued at the same time with this Title V permit revision. The construction permit was for the modification of Air Construction Permit AC01-265409/PSD-FL-153A to remove the production rate limitations

and reclassify the facility as a PSD Synthetic Minor Source by limiting annual VOC emissions to 249 tons. This amendment is to incorporate the construction permit modification.

Based on the initial Title V permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

Appendix H-1, Permit History/ID Number Changes

Metal Container Corporation
Gainesville Lid Plant

Facility ID No.: 0010046

Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
-xxx	Lid Module No. 1	AC01-48261	01/20/82	08/01/83		
	Lid Module No. 2	AC01-48262	01/20/82	08/01/83		
	Lid Module No. 3	AC01-48263	01/20/82	08/01/83		
	Lid Module Nos1 -3	AO01-68876	05/23/83	05/01/88		05/09/86
	Lid Module No. 4	AC01-100439	02/20/85	05/30/86		
	Lid Module No. 5	AC01-146396	05/17/88	10/28/88		
	Lid Module No. 6	AC01-159304		07/31/91		
	Lid Module Nos. 1 - 4	AO01-144728	04/20/88	05/01/93		09/23/88
	Lid Module Nos. 4 - 7	AC01-185835/ PSD153		01/30/93		
	Lid Module No. 4 - 7	AO01-220792	03/19/93	01/30/98		07/02/93; 08/24/93
	Lid Module No. 4 - 7	AC01-265409/ PSD153A	08/24/95	07/30/96		09/01/00
		0010046-002-AV	04/13/98	04/13/03		
		0010046-004-AC	09/01/00	03/01/01		
		0010046-002-AV	04/13/98	04/13/03		

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 31GVL010046

To: Facility ID No.: 0010046

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
 - 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
- {Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Table 1-1, Summary of Air Pollutant Standards and Terms

Metal Container Corporation
Gainesville Lid Plant

PROPOSED Revision of
Permit No.: 0010046-002-AV
Facility ID No.: 0010046 Project No: 003

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description
001: Lid Module Nos. 4,5,6,& 7 and Off-line Conversion Presses

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
VOC		8,760			249.0				III.A.4.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

Table 2-1, Summary of Compliance Requirements

Metal Container Corporation
Gainesville Lid Plant

PROPOSED Revision of
Permit No.: 0010046-002-AV
Facility ID No.: 0010046 Project No.: 003

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

001: Lid Module Nos. 4,5,6,& 7 and Off-line Conversion Presses

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	See permit condition(s)	
						CMS**	
VOC VOC Content		Recordkeeping EPA 24 or 24A or EPA 450/3-84-019	quarterly annually	monthly	n/a		III A.15. III A.9; A.14

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

[electronic file name: 00100462.xls]

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4, F.A.C.

1. Not federally enforceable. General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

2. Not federally enforceable. Procedure to Obtain Permits; Application.

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.

(2) All applications and supporting documents shall be filed in quadruplicate with the Department.

(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except when the application is for renewal of an air pollution operation permit at a minor facility as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.

(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.

(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.

(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.

(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.

(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this Subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.

(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application.

[Rule 62-4.050, F.A.C.]

3. Standards for Issuing or Denying Permits. Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules.

[Rule 62-4.070(7), F.A.C.]

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

4. Modification of Permit Conditions.

(1) For good cause and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee the Department may grant additional time. For the purpose of this section, good cause shall include, but not be limited to, any of the following: (also, see Condition No. 38)

- (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship.
- (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S.
- (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards.
- (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance.

(2) A permittee may request a modification of a permit by applying to the Department.

(3) A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Department in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. For construction permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. For all other permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. A permit for which the permit application fee was prorated in accordance with Rule 62-4.050(4)(1), F.A.C., shall not be extended. In no event shall a permit be extended or remain in effect longer than the time limits established by statute or rule.

[Rule 62-4.080, F.A.C.]

5. Renewals. Prior to one hundred eighty (180) days before the expiration of a permit issued pursuant to Chapter 62-213, F.A.C., the permittee shall apply for a renewal of a permit using forms incorporated by reference in the specific rule chapter for that kind of permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 180 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department or, if there is court review of the Department's final agency action, until a later date is required by Section 120.60, F.S., provided that, for renewal of a permit issued pursuant to Chapter 62-213, F.A.C., the applicant complies with the requirements of Rules 62-213.420(1)(b)3. and 4., F.A.C.

[Rule 62-4.090(1), F.A.C.]

6. Suspension and Revocation.

(1) Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.

(2) Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.

(3) A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or the permit holder's agent:

- (a) Submitted false or inaccurate information in application or operational reports.
- (b) Has violated law, Department orders, rules or permit conditions.
- (c) Has failed to submit operational reports or other information required by Department rules.
- (d) Has refused lawful inspection under Section 403.091, F.S.

[Rule 62-4.100, F.A.C.]

7. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules.

[Rule 62-4.110, F.A.C.]

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

8. Transfer of Permits.

(1) Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Permit" (DEP Form 62-1.201(1)) must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee.

(2) The Department shall approve the transfer of a permit unless it determines that the proposed new permittee cannot provide reasonable assurances that conditions of the permit will be met. The determination shall be limited solely to the ability of the new permittee to comply with the conditions of the existing permit, and it shall not concern the adequacy of these permit conditions. If the Department proposes to deny the transfer, it shall provide both the permittee and the proposed new permittee a written objection to such transfer together with notice of a right to request a Chapter 120, F.S., proceeding on such determination.

(3) Within 30 days of receiving a properly completed Application for Transfer of Permit form, the Department shall issue a final determination. The Department may toll the time for making a determination on the transfer by notifying both the permittee and the proposed new permittee that additional information is required to adequately review the transfer request. Such notification shall be served within 30 days of receipt of an Application for Transfer of Permit form, completed pursuant to Rule 62-4.120(1), F.A.C. If the Department fails to take action to approve or deny the transfer within 30 days of receipt of the completed Application for Transfer of Permit form, or within 30 days of receipt of the last item of timely requested additional information, the transfer shall be deemed approved.

(4) The permittee is encouraged to apply for a permit transfer prior to the sale or legal transfer of a permitted facility. However, the transfer shall not be effective prior to the sale or legal transfer.

(5) Until this transfer is approved by the Department, the permittee and any other person constructing, operating, or maintaining the permitted facility shall be liable for compliance with the terms of the permit. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility.

[Rule 62-4.120, F.A.C.]

9. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. (also, see Condition No. 10)

[Rule 62-4.130, F.A.C.]

10. For purposes of notification to the Department pursuant to Condition No. 9, Condition No. 12(8), and Rule 62-4.130, F.A.C., Plant Operation-Problems, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays; and, for purposes of 40 CFR 70.6(a)(3)(iii)(B), "prompt" shall have the same meaning as "immediately". [also, see Conditions Nos. 9 and 12(8)]

[40 CFR 70.6(a)(3)(iii)(B)]

11. Not federally enforceable. Review. Failure to request a hearing within 14 days of receipt of notice of proposed or final agency action on a permit application or as otherwise required in Chapter 62-103, F.A.C., shall be deemed a waiver of the right to an administrative hearing.

[Rule 62-4.150, F.A.C.]

12. Permit Conditions. All permits issued by the Department shall include the following 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 403.141, 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 this permit.

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

- (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 and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- (7) The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, 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 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 reasonable 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: (also, see Condition No. 10)
- (a) A description of and cause of noncompliance; and,
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 403.111 and 403.73, 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.
- (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 Rule 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.
- (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 five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. the date, exact place, and time of sampling or measurements;
 - 2. the person responsible for performing the sampling or measurements;
 - 3. the dates analyses were performed;
 - 4. the person responsible for performing the analyses;
 - 5. the analytical techniques or methods used; and,
 - 6. 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 the 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.

[Rules 62-4.160 and 62-213.440(1)(b), F.A.C.]

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13. Construction Permits.

(1) No person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department unless exempted by statute or Department rule. In addition to the requirements of Chapter 62-4, F.A.C., applicants for a Department Construction Permit shall submit the following as applicable:

- (a) A completed application on forms furnished by the Department.
- (b) An engineering report covering:
 - 1. plant description and operations,
 - 2. types and quantities of all waste material to be generated whether liquid, gaseous or solid,
 - 3. proposed waste control facilities,
 - 4. the treatment objectives,
 - 5. the design criteria on which the control facilities are based, and,
 - 6. other information deemed relevant.

Design criteria submitted pursuant to Rule 62-4.210(1)(b)5., F.A.C., shall be based on the results of laboratory and pilot-plant scale studies whenever such studies are warranted. The design efficiencies of the proposed waste treatment facilities and the quantities and types of pollutants in the treated effluents or emissions shall be indicated. Work of this nature shall be subject to the requirements of Chapter 471, F.S. Where confidential records are involved, certain information may be kept confidential pursuant to Section 403.111, F.S.

- (c) The owners' written guarantee to meet the design criteria as accepted by the Department and to abide by Chapter 403, F.S. and the rules of the Department as to the quantities and types of materials to be discharged from the installation. The owner may be required to post an appropriate bond or other equivalent evidence of financial responsibility to guarantee compliance with such conditions in instances where the owner's financial resources are inadequate or proposed control facilities are experimental in nature.

(2) The construction permit may contain conditions and an expiration date as determined by the Secretary or the Secretary's designee.

(3) When the Department issues a permit to construct, the permittee shall be allowed a period of time, specified in the permit, to construct, and to operate and test to determine compliance with Chapter 403, F.S., and the rules of the Department and, where applicable, to apply for and receive an operation permit. The Department may require tests and evaluations of the treatment facilities by the permittee at his/her expense.

[Rule 62-4.210, F.A.C.]

14. Not federally enforceable. Operation Permit for New Sources. To properly apply for an operation permit for new sources, the applicant shall submit certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.

[Rule 62-4.220, F.A.C.]

Chapters 28-106 and 62-110, F.A.C.

15. Public Notice, Public Participation, and Proposed Agency Action. The permittee shall comply with all of the requirements for public notice, public participation, and proposed agency action pursuant to Rule 62-110.106 and Rule 62-210.350, F.A.C.

[Rules 62-110.106, 62-210.350 and 62-213.430(1)(b), F.A.C.]

16. Administrative Hearing. The permittee shall comply with all of the requirements for a petition for administrative hearing or waiver of right to administrative proceeding pursuant to Rules 28-106.201, 28-106.301 and 62-110.106, F.A.C.

[Rules 28-106.201, 28-106.301 and 62-110.106, F.A.C.]

Chapter 62-204, F.A.C.

17. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.

[40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

Chapter 62-210, F.A.C.

18. Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law.

(1) Air Construction Permits.

(a) Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of this chapter, Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C. Except as provided under Rule 62-213.415, F.A.C., the owner or operator of any facility seeking to create or change an air emissions bubble shall obtain an air construction permit in accordance with all the applicable provisions of this chapter, Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(b) Notwithstanding the expiration of an air construction permit, all limitations and requirements of such permit that are applicable to the design and operation of the permitted facility or emissions unit shall remain in effect until the facility or emissions unit is permanently shut down, except for any such limitation or requirement that is obsolete by its nature (such as a requirement for initial compliance testing) or any such limitation or requirement that is changed in accordance with the provisions of Rule 62-210.300(1)(b)1., F.A.C. Either the applicant or the Department can propose that certain conditions be considered obsolete. Any conditions or language in an air construction permit that are included for informational purposes only, if they are transferred to the air operation permit, shall be transferred for informational purposes only and shall not become enforceable conditions unless voluntarily agreed to by the permittee or otherwise required under Department rules.

1. Except for those limitations or requirements that are obsolete, all limitations and requirements of an air construction permit shall be included and identified in any air operation permit for the facility or emissions unit. The limitations and requirements included in the air operation permit can be changed, and thereby superseded, through the issuance of an air construction permit, federally enforceable state air operation permit, federally enforceable air general permit, or Title V air operation permit; provided, however, that:

a. Any change that would constitute an administrative correction may be made pursuant to Rule 62-210.360, F.A.C.;

b. Any change that would constitute a modification, as defined at Rule 62-210.200, F.A.C., shall be accomplished only through the issuance of an air construction permit; and

c. Any change in a permit limitation or requirement that originates from a permit issued pursuant to 40 CFR 52.21, Rule 62-204.800(10)(d)2., F.A.C., Rule 62-212.400, F.A.C., Rule 62-212.500, F.A.C., or any former codification of Rule 62-212.400 or 62-212.500, F.A.C., shall be accomplished only through the issuance of a new or revised air construction permit under Rule 62-204.800(10)(d)2., F.A.C., 62-212.400 or 62-212.500, F.A.C., as appropriate.

2. The force and effect of any change in a permit limitation or requirement made in accordance with the provisions of Rule 62-210.300(1)(b)1., F.A.C., shall be the same as if such change were made to the original air construction permit.

3. Nothing in Rule 62-210.300(1)(b), F.A.C., shall be construed as to allow operation of a facility or emissions unit without a valid air operation permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in Chapter 62-210 or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of Chapter 62-210, Chapter 62-213, and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;

2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.

3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.
- a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.
 - b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:
 - (i) the owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and,
 - (ii) the owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and,
 - (iii) the emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.
 - c. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in Rule 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.
 - d. The operation permit for an electric utility generating unit on cold standby or long-term reserve shutdown shall be renewed for a five-year period, and additional five-year periods, even if the unit is not maintained in operational condition, provided the conditions given in Rules 62-210.300(2)(a)3.b.(i) through (iii), F.A.C., are met.
4. In the case of an emissions unit permitted pursuant to Rules 62-210.300(2)(a)3.b., c., and d., F.A.C., include reasonable notification and compliance testing requirements for reactivation of such emissions unit and provide that the owner or operator demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.

[Rules 62-210.300(1) & (2), F.A.C.]

19. Not federally enforceable. Notification of Startup. The owner or operator of any emissions unit or facility which has a valid air operation permit and which has been shut down more than one (1) year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of sixty (60) days prior to the intended startup date.

- (a) The notification shall include the planned startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
- (b) If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

20. Emissions Unit Reclassification.

- (a) Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.

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(b) If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.
[Rule 62-210.300(6), F.A.C.]

21. Public Notice and Comment.

(1) Public Notice of Proposed Agency Action.

(a) A notice of proposed agency action on permit application, where the proposed agency action is to issue the permit, shall be published by any applicant for:

1. An air construction permit;
2. An air operation permit, permit renewal or permit revision subject to Rule 62-210.300(2)(b), F.A.C., (i.e., a FESOP), except as provided in Rule 62-210.300(2)(b)1.b., F.A.C.; or
3. An air operation permit, permit renewal, or permit revision subject to Chapter 62-213, F.A.C., except those permit revisions meeting the requirements of Rule 62-213.412(1), F.A.C.

(b) The notice required by Rule 62-210.350(1)(a), F.A.C., shall be published in accordance with all otherwise applicable provisions of Rule 62-110.106, F.A.C. A public notice under Rule 62-210.350(1)(a)1., F.A.C., for an air construction permit may be combined with any required public notice under Rule 62-210.350(1)(a)2. or 3., F.A.C., for air operation permits. If such notices are combined, the public notice must comply with the requirements for both notices.

(c) Except as otherwise provided at Rules 62-210.350(2) and (5), F.A.C., each notice of intent to issue an air construction permit shall provide a 14-day period for submittal of public comments.

(2) Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment - Area Preconstruction Review.

(a) Before taking final agency action on a construction permit application for any proposed new or modified facility or emissions unit subject to the preconstruction review requirements of Rule 62-212.400 or 62-212.500, F.A.C., the Department shall comply with all applicable provisions of Rule 62-110.106, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:

1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S., and the Department's analysis of the effect of the proposed construction or modification on ambient air quality, including the Department's preliminary determination of whether the permit should be approved or disapproved;
2. A 30-day period for submittal of public comments; and,
3. A notice, by advertisement in a newspaper of general circulation in the county affected, specifying the nature and location of the proposed facility or emissions unit, whether BACT or LAER has been determined, the degree of PSD increment consumption expected, if applicable, and the location of the information specified in paragraph 1. above; and notifying the public of the opportunity for submitting comments and requesting a public hearing.

(b) The notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-110.106, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.

(c) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall also be sent by the Department to the Regional Office of the U. S. Environmental Protection Agency and to all other state and local officials or agencies having cognizance over the location of such new or modified facility or emissions unit, including local air pollution control agencies, chief executives of city or county government, regional land use planning agencies, and any other state, Federal Land Manager, or Indian Governing Body whose lands may be affected by emissions from the new or modified facility or emissions unit.

(d) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be displayed in the appropriate district, branch and local program offices.

(e) An opportunity for public hearing shall be provided in accordance with Chapter 120, F.S., and Rule 62-110.106, F.A.C.

(f) Any public comments received shall be made available for public inspection in the location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., is available and shall be considered by the Department in making a final determination to approve or deny the permit.

(g) The final determination shall be made available for public inspection at the same location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., was made available.

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(h) For a proposed new or modified emissions unit which would be located within 100 kilometers of any Federal Class I area or whose emissions may affect any Federal Class I area, and which would be subject to the preconstruction review requirements of Rule 62-212.400, F.A.C., or Rule 62-212.500, F.A.C.:

1. The Department shall mail or transmit to the Administrator a copy of the initial application for an air construction permit and notice of every action related to the consideration of the permit application.
2. The Department shall mail or transmit to the Federal Land Manager of each affected Class I area a copy of any written notice of intent to apply for an air construction permit; the initial application for an air construction permit, including all required analyses and demonstrations; any subsequently submitted information related to the application; the preliminary determination and notice of proposed agency action on the permit application; and any petition for an administrative hearing regarding the application or the Department's proposed action. Each such document shall be mailed or transmitted to the Federal Land Manager within fourteen (14) days after its receipt by the Department.

(3) Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.

(a) Before taking final agency action to issue a new, renewed, or revised air operation permit subject to Chapter 62-213, F.A.C., the Department shall comply with all applicable provisions of Rule 62-110.106, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:

1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S.; and,
2. A 30-day period for submittal of public comments.

(b) The notice provided for in Rule 62-210.350(3)(a), F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-110.106, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.

(c) The notice shall identify:

1. The facility;
2. The name and address of the office at which processing of the permit occurs;
3. The activity or activities involved in the permit action;
4. The emissions change involved in any permit revision;
5. The name, address, and telephone number of a Department representative from whom interested persons may obtain additional information, including copies of the permit draft, the application, and all relevant supporting materials, including any permit application, compliance plan, permit, monitoring report, and compliance statement required pursuant to Chapter 62-213, F.A.C. (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), and all other materials available to the Department that are relevant to the permit decision;
6. A brief description of the comment procedures required by Rule 62-210.350(3), F.A.C.;
7. The time and place of any hearing that may be held, including a statement of procedure to request a hearing (unless a hearing has already been scheduled); and,
8. The procedures by which persons may petition the Administrator to object to the issuance of the proposed permit after expiration of the Administrator's 45-day review period.

[Rule 62-210.350, F.A.C.]

22. Administrative Permit Corrections.

(1) A facility owner shall notify the Department by letter of minor corrections to information contained in a permit. Such notifications shall include:

- (a) Typographical errors noted in the permit;
- (b) Name, address or phone number change from that in the permit;
- (c) A change requiring more frequent monitoring or reporting by the permittee;
- (d) Changes listed at 40 CFR 72.83(a)(1), (2), (6), (9) and (10), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o;
- (e) Changes listed at 40 CFR 72.83(a)(11), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o, provided the notification is accompanied by a copy of any EPA determination concerning the similarity of the change to those listed at Rule 62-210.360(1)(d), F.A.C.; and
- (f) Any other similar minor administrative change at the source.

(2) Upon receipt of any such notification the Department shall within 60 days correct the permit and provide a corrected copy to the owner.

(3) After first notifying the owner, the Department shall correct any permit in which it discovers errors of the types listed at Rule 62-210.360(1)(a) and (b), F.A.C., and provide a corrected copy to the owner.

(4) For Title V source permits, other than general permits, a copy of the corrected permit shall be provided to EPA and any approved local air program in the county where the facility or any part of the facility is located.

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(5) The Department shall incorporate requirements resulting from issuance of a new or revised construction permit into an existing Title V source permit, if the construction permit or permit revision incorporates requirements of federally enforceable preconstruction review, and if the applicant requests at the time of application that all of the requirements of Rule 62-213.430(1), F.A.C., be complied with in conjunction with the processing of the construction permit application.

[Rule 62-210.360, F.A.C.]

23. Reports.

(3) Annual Operating Report for Air Pollutant Emitting Facility.

(a) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year.

(c) The annual operating report shall be submitted to the appropriate Department District or Department approved local air pollution control program office by March 1 of the following year unless otherwise indicated by permit condition or Department request.

[Rule 62-210.370(3), F.A.C.]

24. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

25. Forms and Instructions. The forms used by the Department in the stationary source control program are adopted and incorporated by reference in this section. The forms are listed by rule number, which is also the form number, with the subject, title and effective date. Forms 62-210.900(1),(3),(4) and (5), F.A.C., including instructions, are available from the Department as hard-copy documents or executable files on computer diskettes. Copies of forms (hard-copy or diskette) may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Notwithstanding the requirement of Rule 62-4.050(2), F.A.C., to file application forms in quadruplicate, if an air permit application is submitted using the Department's electronic application form, only one copy of the diskette and signature pages is required to be submitted.

(1) Application for Air Permit - Title V Source, Form and Instructions (Effective 2-11-99).

(a) Acid Rain Part (Phase II), Form and Instructions (Effective 7-1-95).

1. Repowering Extension Plan, Form and Instructions (Effective 7-1-95).

2. New Unit Exemption, Form and Instructions (Effective 7-1-95).

3. Retired Unit Exemption, Form and Instructions (Effective 7-1-95).

4. Phase II NOx Compliance Plan, Form and Instructions (Effective 1-6-98).

5. Phase II NOx Averaging Plan, Form (Effective 1-6-98).

(b) Reserved.

(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions (Effective 2-11-99).

[Rule 62-210.900, F.A.C.]

Chapter 62-213, F.A.C.

26. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions.

[Rules 62-213.205 and 62-213.900(1), F.A.C.]

27. Annual Emissions Fee. Failure to pay timely any required annual emissions fee, penalty, or interest constitutes grounds for permit revocation pursuant to Rule 62-4.100, F.A.C.

[Rule 62-213.205(1)(g), F.A.C.]

28. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

[Rule 62-213.205(1)(j), F.A.C.]

29. Annual Emissions Fee. A completed DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be submitted by the responsible official with the annual emissions fee.

[Rule 62-213.205(1)(k), F.A.C.]

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

30. Air Operation Permit Fees. After December 31, 1992, no permit application processing fee, renewal fee, modification fee or amendment fee is required for an operation permit for a Title V source.

[Rule 62-213.205(4), F.A.C.]

31. Permits and Permit Revisions Required. All Title V sources are subject to the permit requirements of Chapter 62-213, F.A.C.

(1) No Title V source may operate except in compliance with Chapter 62-213, F.A.C.

(2) Except as provided in Rule 62-213.410, F.A.C., no source with a permit issued under the provisions of this chapter shall make any changes in its operation without first applying for and receiving a permit revision if the change meets any of the following:

(a) Constitutes a modification;

(b) Violates any applicable requirement;

(c) Exceeds the allowable emissions of any air pollutant from any unit within the source;

(d) Contravenes any permit term or condition for monitoring, testing, recordkeeping, reporting or of a compliance certification requirement;

(e) Requires a case-by-case determination of an emission limitation or other standard or a source specific determination of ambient impacts, or a visibility or increment analysis under the provisions of Chapters 62-212 or 62-296, F.A.C.;

(f) Violates a permit term or condition which the source has assumed for which there is no corresponding underlying applicable requirement to which the source would otherwise be subject;

(g) Results in the trading of emissions among units within a source except as specifically authorized pursuant to Rule 62-213.415, F.A.C.

(h) Results in the change of location of any relocatable facility identified as a Title V source pursuant to paragraph (a)-(e), (g) or (h) of the definition of "major source of air pollution" at Rule 62-210.200, F.A.C.

(i) Constitutes a change at an Acid Rain Source under the provisions of 40 CFR 72.81(a)(1),(2),or (3),(b)(1) or (b)(3), hereby incorporated by reference;

(j) Constitutes a change in a repowering plan, nitrogen oxides averaging plan, or nitrogen oxides compliance deadline extension at an Acid Rain Source.

(k) Is a request for exemption pursuant to Rule 62-214.340, F.A.C.

[Rule 62-213.400(1) & (2), F.A.C.]

32. Changes Without Permit Revision. Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation in each alternative method of operation:

(1) Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;

(2) Permitted sources may implement the terms or conditions of a new or revised construction permit if;

(a) The application for construction permit complied with the requirements of Rule 62-213.420(3) and (4), F.A.C.;

(b) The terms or conditions were subject to federally enforceable preconstruction review pursuant to Chapter 62-212, F.A.C.; and,

(c) The new or revised construction permit was issued after the Department and the applicant complied with all the requirements of Rule 62-213.430(1), F.A.C.;

(3) A permitted source may implement operating changes after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;

(a) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;

(b) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;

(4) Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.

[Rule 62-213.410, F.A.C.]

33. Immediate Implementation Pending Revision Process.

(1) Those permitted Title V sources making any change that constitutes a modification pursuant to the definition of modification at Rule 62-210.200, F.A.C., but which would not constitute a modification pursuant to 42 USC 7412(a) or to 40 CFR 52.01, 60.2, or 61.15, adopted and incorporated by reference at Rule 62-204.800, F.A.C., may implement such change prior to final issuance of a permit revision in accordance with this section, provided the change:

(a) Does not violate any applicable requirement;

(b) Does not contravene any permit term or condition for monitoring, testing, recordkeeping or reporting, or any compliance certification requirement;

- (c) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis under the provisions of Chapter 62-212 or 62-296, F.A.C.;
 - (d) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject including any federally enforceable emissions cap or federally enforceable alternative emissions limit.
- (2) A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. The Title V source may conform its application for construction permit to include all information required by Rule 62-213.420, F.A.C., in lieu of submitting separate application forms.
- (3) The Department shall process the application for operation permit revision in accordance with the provisions of Chapter 62-213, F.A.C., except that the Department shall issue a draft permit revision or a determination to deny the revision within 60 days of receipt of a complete application for operation permit revision or, if the Title V source has submitted a construction permit application conforming to the requirements of Rule 62-213.420, F.A.C., the Department shall issue a draft permit or a determination to deny the revision at the same time the Department issues its determination on issuance or denial of the construction permit application. The Department shall not take final action until all the requirements of Rule 62-213.430(1)(a), (c), (d), and (e), F.A.C., have been complied with.
- (4) Pending final action on the operation permit revision application, the source shall implement the changes in accordance with the terms and conditions of the source's new or revised construction permit.
- (5) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes until after the Department takes final action to issue the operation permit revision.
- (6) If the Department denies the source's application for operation permit revision, the source shall cease implementation of the proposed changes.
- [Rule 62-213.412, F.A.C.]

34. Permit Applications.

- (1) **Duty to Apply.** For each Title V source, the owner or operator shall submit a timely and complete permit application in compliance with the requirements of Rules 62-213.420, 62-4.050(1) & (2), and 62-210.900, F.A.C.
- (a) **Timely Application.**
 - 3. For purposes of permit renewal, a timely application is one that is submitted in accordance with Rule 62-4.090, F.A.C.
 - (b) **Complete Application.**
 - 1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on DEP Form No. 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.
 - 2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)1., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rules 62-213.420(1)(b)3. and 4. F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rules 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

[Rules 62-213.420(1)(a)3. and 62-213.420(1)(b)1., 2., 3. & 4., F.A.C.]

35. Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA. (also, see Condition No. 50.)
[Rule 62-213.420(2), F.A.C.]

36. Standard Application Form and Required Information. Applications shall be submitted under Chapter 62-213, F.A.C., on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions unit. An application must include information sufficient to determine all applicable requirements for the Title V source and each emissions unit and to evaluate a fee amount pursuant to Rule 62-213.205, F.A.C.
[Rule 62-213.420(3), F.A.C.]

37. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
[Rule 62-213.420(4), F.A.C.]

38. a. Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

b. Permit Revision Procedures. Permit revisions shall meet all requirements of Chapter 62-213, F.A.C., including those for content of applications, public participation, review by approved local programs and affected states, and review by EPA, as they apply to permit issuance and renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference. The below requirements from 40 CFR 70.7(f) are adopted and incorporated by reference in Rule 62-213.430(4), F.A.C.:

o 40 CFR 70.7(f): Reopening for Cause. (also, see Condition No. 4)

(1) This section contains provisions from 40 CFR 70.7(f) that specify the conditions under which a Title V permit shall be reopened prior to the expiration of the permit. A Title V permit shall be reopened and revised under any of the following circumstances:

- (i) Additional applicable requirements under the Act become applicable to a major Part 70 source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii).
- (ii) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approved by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (iii) The permitting authority or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- (iv) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(2) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(3) Reopenings under 40 CFR 70.7(f)(1) shall not be initiated before a notice of such intent is provided to the Part 70 source by the permitting authority at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

[Rules 62-213.430(3) & (4), F.A.C.; and, 40 CFR 70.7(f)]

39. Insignificant Emissions Units or Pollutant-Emitting Activities.

(a) All requests for determination of insignificant emissions units or activities made pursuant to Rule 62-213.420(3)(m), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to Chapter 62-213, F.A.C. Insignificant emissions units or activities shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under Chapter 62-213, F.A.C., shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to Rule 62-213.430(6), F.A.C.

(b) An emissions unit or activity shall be considered insignificant if:

1. Such unit or activity would be subject to no unit-specific applicable requirement;
2. Such unit or activity, in combination with other units or activities proposed as insignificant, would not cause the facility to exceed any major source threshold(s) as defined in Rule 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); and
3. Such unit or activity would not emit or have the potential to emit:
 - a. 500 pounds per year or more of lead and lead compounds expressed as lead;
 - b. 1,000 pounds per year or more of any hazardous air pollutant;
 - c. 2,500 pounds per year or more of total hazardous air pollutants; or
 - d. 5.0 tons per year or more of any other regulated pollutant.

[Rule 62-213.430(6), F.A.C.]

40. Permit Duration. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five (5) years.

[Rule 62-213.440(1)(a), F.A.C.]

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

41. Monitoring Information. All records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses.
[Rule 62-213.440(1)(b)2.a., F.A.C.]
42. Retention of Records. Retention of records of all monitoring data and support information shall be for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
[Rule 62-213.440(1)(b)2.b., F.A.C.]
43. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports.
[Rule 62-213.440(1)(b)3.a., F.A.C.]
44. Deviation from Permit Requirements Reports. The permittee shall report in accordance with the requirements of Rules 62-210.700(6) and 62-4.130, F.A.C., any deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.
[Rule 62-213.440(1)(b)3.b., F.A.C.]
45. Reports. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C.
[Rule 62-213.440(1)(b)3.c., F.A.C.]
46. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect.
[Rule 62-213.440(1)(d)1., F.A.C.]
47. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity.
[Rule 62-213.440(1)(d)3., F.A.C.]
48. A Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C.
[Rule 62-213.440(1)(d)4., F.A.C.]
49. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference.
[Rule 62-213.440(1)(d)5., F.A.C.]
50. Confidentiality Claims. Any permittee may claim confidentiality of any data or other information by complying with Rule 62-213.420(2), F.A.C. (also, see Condition No. 35.)
[Rule 62-213.440(1)(d)6., F.A.C.]

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

51. Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit. Such statements shall be submitted to the Department and EPA annually, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement. Such statements shall be accompanied by a certification in accordance with Rule 62-213.420(4), F.A.C. The statement of compliance shall include all the provisions of 40 CFR 70.6(c)(5)(iii), incorporated by reference at Rule 62-204.800, F.A.C.

o 40 CFR 70.6(c)(5)(iii). The compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(A) The identification of each term or condition of the permit that is the basis of the certification;

(B) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required under 40 CFR 70.6(a)(3). If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

(C) The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph (c)(5)(iii)(B) of this section. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under part 64 of this chapter occurred; and

(D) Such other facts as the permitting authority may require to determine the compliance status of the source.

The statement shall be accompanied by a certification by a responsible official, in accordance with Rule 62-213.420(4), F.A.C. The responsible official may treat compliance with all other applicable requirements as a surrogate for compliance with Rule 62-296.320(2), Objectionable Odor Prohibited.

[Rule 62-213.440(3), F.A.C.]

52. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, provided that the source included such applicable requirements in the permit application. Nothing in Rule 62-213.460, F.A.C., or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program.

{Permitting note: The permit shield is not in effect until the effective date of the permit.}

[Rule 62-213.460, F.A.C.]

53. Forms and Instructions. The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The form is listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or by contacting the appropriate permitting authority.

(1) Major Air Pollution Source Annual Emissions Fee (AEF) Form.

[Rule 62-213.900(1), F.A.C.]

Chapter 62-256, F.A.C.

54. Not federally enforceable. Open Burning. This permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C. Source shall comply with Chapter 62-256, F.A.C., for any open burning at the source.

[Chapter 62-256, F.A.C.]

Chapter 62-281, F.A.C.

55. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Rule 62-281.100, F.A.C. Those requirements include the following restrictions:

(1) Any facility having any refrigeration equipment normally containing 50 (fifty) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added pursuant to 40 CFR 82.166;

APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99) (continued)

- (2) No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided at 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved pursuant to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
- (3) No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or Class II substance at 40 CFR 82, Subpart A, Appendices A and B, except in compliance with Rule 62-281.100, F.A.C., and 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;
- (4) No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or Class II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined at 40 CFR 82.152) for service, maintenance or repair unless the person has been properly trained and certified pursuant to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance pursuant to 40 CFR 82.158 and unless the person observes the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;
- (5) No person may dispose of appliances (except small appliances, as defined at 40 CFR 82.152) without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;
- (6) No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined at 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82, Subpart F.
[40 CFR 82; and, Chapter 62-281, F.A.C. (Chapter 62-281, F.A.C., is not federally enforceable)]

Chapter 62-296, F.A.C.

56. Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:

- (a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or
- (b) An emergency exists which requires immediate action to protect human health and safety; or
- (c) A county or municipality would use a portable air curtain incinerator to burn yard trash generated by a hurricane, tornado, fire or other disaster and the air curtain incinerator would otherwise be operated in accordance with the permitting exemption criteria of Rule 62-210.300(3), F.A.C.

[Rule 62-296.320(3), F.A.C.]

58. Unconfined Emissions of Particulate Matter.

(4)(c)1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

3. Reasonable precautions may include, but shall not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the emissions unit to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

4. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

[Rules 62-296.320(4)(c)1., 3., & 4. F.A.C.]

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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

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

Dear Mr. Pusch:

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

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

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

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

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

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

Odor None Objectionable

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

Pollutant	Acceptable Ambient Concentration (ug/m ³)		
	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;

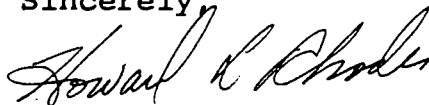
Mr. Dean E. Pusch
August 22, 1994
Page Three

- (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. Pontwell 8/25/94
Clerk Date

SENDER:

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

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

1 Addressee's Address

2 Restricted Delivery
Consult postmaster for fee.

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

4a Article Number:
P 872 562 707

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

7 Date of Delivery:
8/30/94

5 Signature (Addressee)

6 Signature (Agent)

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

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

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service

P 872 562 707



Receipt for Certified Mail


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

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

PS Form 3800, JUNE 1991

Memorandum

Florida Department of
Environmental Protection

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

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

The Bureau recommends your approval.

CF/TH/pm



Lawton Chiles
Governor

Florida Department of Environmental Protection

PERMIT WITH FLA DEP
CHANGES THRU 8/29/93

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

Virginia B. Wetherell
Secretary

PERMITTEE:

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

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

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

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

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

In accordance with:

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

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

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

GENERAL CONDITIONS:

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

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

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

GENERAL CONDITIONS:

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

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

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

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

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

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

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

GENERAL CONDITIONS:

13. This permit also constitutes:

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

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

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

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

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

<u>3.2 lbs VOC</u>	<u>6.0 lbs VOC</u>
gal end sealant	gal tab lube
(excluding water)	(excluding water)
Clean up Solvent: <u>6.32 lbs VOC</u>	<u>and</u> <u>5.84 lbs VOC</u>
gal mineral spirits	gal heptane

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

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

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

I.D. Number: 31GVL01004601
Permit/Cert: 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>
Module 4	15.9	65.4
Module 5	32.9	135.2
Module 6	32.9	135.2
Module 7	29.8	122.1
Off-line Conversion Presses	6.4	26.1
Entire Facility	118	484

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

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

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

SPECIFIC CONDITIONS:

SC No. 13 Cont'd.

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

14. Compliance shall be determined by recording the following data for each material used:

- a.¹ amount
- b.² density (lbs/gal)
- c. VOC factor (% by wt and type)
- d. time factor (hrs)
- e. total cumulative emissions (in tons for each VOC)
- f. emissions rate (lbs/hr, lbs/day, lbs/month, tons/yr)

¹Maintain a file of plant usage logs

²Maintain a file of mfr. spec's data

15. Submit an Annual Operations Report for this source that demonstrates compliance by providing a record of the data required in Specific Condition #14. Also include a copy of the mfr. spec's data sheet(s) for each material used.
16. In each test report, submit the maximum lid production and input rate at which this source was operated since the most recent test.
17. The Annual Operations Report shall be submitted on the form supplied by the Department for each calendar year on or before March 1.
18. The ID No. and ID Name for this source is to be used on all correspondence.
19. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
20. Forms for renewal will be sent 5 months prior to 01-30-98 and the completed forms with the test results are due 90 days prior to 01-30-98.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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

0004977



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

RECEIVED
DER - MAIL ROOM
1994 JUL -5 PM 3:08

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

Dear Mr. Fancy:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Mr. Clair Fancy
July 1, 1994
Page 4

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

Your timely processing of this request would be greatly appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

A handwritten signature in black ink, appearing to read "Dean E. Pusch". The signature is fluid and cursive, with a large initial "D" and "P".

Dean E. Pusch
Manager, Regulatory Issues
Environmental Affairs Department

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



ANHEUSER-BUSCH
COMPANIES, INC.

CHECK NUMBER

0004977 No. 70148824

5972701

DATE 07/01/94

2397-09

62-26
311

TWO HUNDRED FIFTY AND 00/100***** \$250.00

PAY TO THE ORDER OF

FLORIDA DEPT OF ENVIRONMENTAL PROTECTION
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-6564

VOID 80 DAYS AFTER ISSUANCE

CHEMICAL BANK DELAWARE
WILMINGTON, DELAWARE



DRAFT STUB-NOT NEGOTIABLE EXPLANATION OF PAYMENT - DETACH AND RETAIN FOR YOUR RECORDS

70148824

REFER ALL INQUIRIES TO ANHEUSER BUSCH COMPANIES INC ST LOUIS MO

VOUCHER NUMBER	REFERENCE DATE	REFERENCE NUMBER	TYPE	GROSS AMOUNT	NET AMOUNT
540120	06/30/94		A	250.00	250.00

DRAFT STUB-NOT NEGOTIABLE EXPLANATION OF PAYMENT - DETACH AND RETAIN FOR YOUR RECORDS

70148824

REQUESTORS NAME - PEGGY MCDONOUGH 577-4161

John

① Copy for all
MTG Participants

② Copy for Patty
Admin

③ Pls brief me
on each item
before MTG

John

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



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 18, 1993

Mr. Dean E. Pusch
Environmental Affairs Department
Anheuser-Busch Companies, Inc.
Executive Offices
One Busch Place
St. Louis, MO U.S.A. 63118-1852

Dear Mr. Pusch:

RE: AC 01-185835
Lid Modules 4-7 and Off-Line Conversion Presses
Metal Container Corporation - Gainesville, Florida

The Department is in receipt of your letter dated October 8, 1993, requesting the addition of two additional liners at the Metal Container facility. These liners will bring the plant total to 16. These two additional liners will not increase production capacity, but will allow more efficient operation of the existing presses. This request is acceptable as proposed since there will be no change in the facility production or allowable emissions.

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. 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, Florida Statutes.

Mr. Dean E. Pusch
AC 01-185835
Permit Amendment
November 18, 1993
Page 2 of 3

The Petition shall contain the following information:

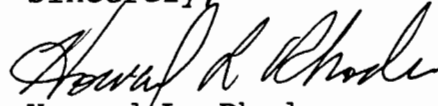
- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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;
- (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, F.A.C.

Mr. Dean E. Pusch
AC 01-185835
Permit Amendment
November 18, 1993
Page 3 of 3

This letter must be attached to the above mentioned permit and shall become a part of that permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/bjb

Attachment to be Incorporated:

Mr. Dean Pusch's letter of October 8, 1993.

cc: Robert Leetch, NED
Emerson Raulerson, NED
DEP Gainesville, Air Section

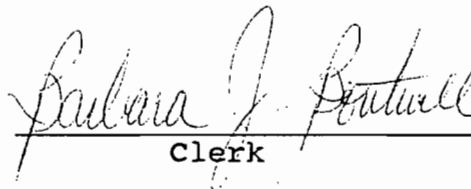
CERTIFICATE OF SERVICE

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 11/18/93 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

11/18/93
Date

John

11-2

Ivusa would prefer to handle this with a letter amendment. Is this OK with you? We'll need to ask for a fee (letter attached)

thanks
Patty

Date updated

241047

OK
JTB
w/cover
notes

OK
GPL
11/7

P 872 562 499



Receipt for Certified Mail

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

Sent to Mr. Dean E. Pusch	
Street and No. One Busch Place	
P.O., State and ZIP Code St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 11/19/93 AC 01-185835	

PS Form 3800, JUNE 1991

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes
FROM: Clair Fancy *CHF*
DATE: November 18, 1993
SUBJ: Approval of an Amendment to Construction Permit
AC 01-185835, PSD-FL-153
Metal Container Corporation
Alachua County

Attached for your approval and signature is an amendment to a construction permit prepared by the Bureau of Air Regulation for the above referenced company. The purpose of the amendment is to allow two additional liners at Metal Container's facility. These two additional liners will not increase production capacity, or allowable emissions, but will allow more efficient operation of the existing presses.

I recommend your approval and signature.

CHF/TH/bjb

Attachment



ANHEUSER-BUSCH COMPANIES

November 15, 1993

RECEIVED

NOV 16 1993

Division of Air
Resources Management

Via Federal Express #821-000-9636

Mr. C. H. Fancy, 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 Lid Plant
Permit AC 01-137740**

Dear Mr. Fancy:

Attached please find check #70127122 in the amount of \$250.00 to cover the processing fee for my request dated October 8, 1993 (copy attached) regarding the referenced permit.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

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

Dean E. Pusch
Environmental Affairs Department

DEP:lb



USE THIS AIRBILL FOR SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII.
USE THE INTERNATIONAL AIR WAYBILL FOR SHIPMENTS TO PUERTO RICO AND ALL NON U.S. LOCATIONS.
QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

8210009636

3245M

8210009636

RECIPIENT'S COPY

From (Your Name) Please Print D. E. Pusch		Your Phone Number (Very Important) 314) 577-4162		To (Recipient's Name) Please Print Mr. C. H. Fancy, Chief		Recipient's Phone Number (Very Important) ()			
Company HEUSER-BUSCH CO INC		Department/Floor No.		Company Bureau of Air Regulation		Department/Floor No.			
Street Address BUSCH PLACE				Street Address Florida Dept. of Envir. Protection					
City LOUIS				City Tallahassee,		City 2600 Blair Stone Road			
State MO		ZIP Required 63118		State FL		ZIP Required 32399-24			
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on Invoice.) 164-1907-162				IF HOLD AT FEDEX LOCATION, Print FEDEX Address Here Street Address					
PAYMENT 1 <input type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card				City State ZIP Required					
5 <input type="checkbox"/> Cash 6 <input type="checkbox"/> Check		7 <input type="checkbox"/> Cash 8 <input type="checkbox"/> Check		9 <input type="checkbox"/> Cash 10 <input type="checkbox"/> Check					
SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)		PACKAGES		WEIGHT In Pounds Only			
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> OTHER PACKAGING 16 <input type="checkbox"/> FEDEX LETTER* 12 <input type="checkbox"/> FEDEX PAK* 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY* Government Overnight (Restricted for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE		Weekday Service 1 <input type="checkbox"/> HOLD AT FEDEX LOCATION WEEKDAY (Fill in Section H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY Saturday Service 31 <input type="checkbox"/> HOLD AT FEDEX LOCATION SATURDAY (Fill in Section H) 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) Special Handling 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 6 <input type="checkbox"/> DRY ICE (Dangerous Goods Shipper's Declaration not required) Dry Ice, IRI 1945, _____ X _____ kg. 904 III		Total Total Total DIM SHIPMENT (Chargeable Weight) _____ lbs. L x W x H _____ x _____ x _____		Emp. No. _____ Date _____ <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address _____ City _____ State _____ Zip _____ Received By: X Date/Time Received _____ FedEx Employee Number _____		Federal Express Use Base Charges _____ Declared Value Charge _____ Other 1 _____ Other 2 _____ Total Charges _____ REVISION DATE 12/92 PART #137204 FXEM 8/93 FORMAT #158 158 © 1992-93 FEDEX PRINTED IN U.S.A.	
70 <input type="checkbox"/> OVERNIGHT FREIGHT (Confirmed reservation required)		80 <input type="checkbox"/> TWO-DAY FREIGHT**		1 <input checked="" type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		7 <input type="checkbox"/> Release Signature: _____			



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 2, 1993

CERTIFIED MAIL-RETURN RECEIPT

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

Dear Mr. Pusch:

RE: Metal Container Corp., Gainesville Lid Plant
AC01-137740, Request for Permit Amendment

The Bureau of Air Regulation received your October 8, 1993, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$250 processing fee for a permit amendment; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

for *Patricia G. Adams*
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

cc: Teresa Heron

P 872 562 491



**Receipt for
Certified Mail**

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

Sent to Mr. Dean E. Pusch	
Street and No. One Busch Place	
P.O. State and ZIP Code St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 11/03/93 AC01-137740	

PS Form 3800, JUNE 1991



ANHEUSER-BUSCH COMPANIES

RECEIVED

OCT 18 1993

Division of Air
Resources Management

October 8, 1993

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

**Re: Metal Container Corporation - Gainesville Lid Plant
ID # 31GVL001004601
Lid Modules 4-7 and Off-Line Conversion Presses**

Dear Ms. Heron:

In order to optimize production efficiency at the Gainesville Lid Center, Metal Container Corporation intends to add two liners. These liners will bring the plant total to 16. The two additional liners will not increase production capacity, but will allow more efficient operation of the existing presses. Since the facility's permitted emissions (Permit Number A001-220792) are based on conversion press capacity, there will not be any change in potential emissions due to the additional liners.

The following table will update the Department's files to show the plant's configuration after the proposed addition of the two liners - one each on Modules 6 and 7.

<u>PRODUCTION MODULE DESIGNATION</u>		<u>EQUIPMENT QUANTITIES</u>		
<u>FLA DER</u>	<u>PLANT</u>	<u>SHELL PRESSES</u>	<u>LINERS</u>	<u>CONVERSION PRESSES</u>
7	1	1	5	1
6	3	1	5	3
5	2	1	4	3
4	4	1	2	2
Offline Presses	Offline Module	-	-	2
Facility Totals		4	16	12

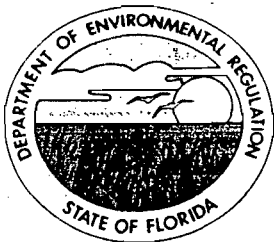
Please call me at 314/577-4162 if you have any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Environmental Affairs Department

DEP:lb
I:\envall\word\dep\10893



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 18, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dean E. Pusch, Senior Environmental Scientist
Anheuser-Busch Companies, Inc.
One Busch Place
St. Louis, MO 63118-1852

Dear Mr. Pusch:

Re: Metal Container Corporation
Permit No. AC 01-185835 & PSD-FL-153
Part Cleaners and Storage Tanks
Gainesville, Alachua County, Florida

In response to the July 30, 1992, telephone conversation between you and Teresa Heron of our staff, the Department wants to clarify that, when this permit was reviewed, emissions from the above referenced sources were included in the overall allowable emissions (484 tons VOC per year) for this facility. These emission estimates were submitted in your correspondence of December 10, 1990. Therefore, Specific Condition No. 3 of Permit No. AC 01-185835 & PSD-FL-153 will not be changed.

If you have any question regarding this matter, please feel free to call Teresa Heron at (904) 488-1344.

Sincerely,

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

CHF/TH/plm

cc: Emerson Raulerson, NED

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 Fee will provide you the signature of the person delivered to and the date of delivery.

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Dean E. Pusch
Senior Environmental Scientist
Anheuser-Busch Companies, Inc.
One Busch Place
St. Louis, MO 63118-1852

4a. Article Number
P 062 921 992

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

7. Date of Delivery

5. Signature (Addressee)

6. Signature (Agent)

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

PS Form 3811, November 1990 U.S. GPO: 1991

DOMESTIC RETURN RECEIPT

"1459"
"OK 8/18"
"GFL"

P 062 921 992

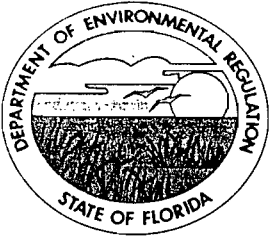


Receipt for Certified Mail

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

Sent to Mr. Dean E. Pusch, AB Company	
Street and No. One Busch Place	
P.O., State and ZIP Code St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8-19-92 Permit: AC 01-185835 PSD-FL-153	

PS Form 3800, June 1991



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 5, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dean E. Pusch
Sr. Environmental Scientist
Anheuser-Busch Companies
Executives Offices
One Busch Place
St. Louis, MO 63118-1852

Dear Mr. Pusch:

Re: Permit No. AC 01-185835

The Department is in receipt of your letter dated January 10, requesting a modification of Specific Condition No. 3 of the above referenced permit. This request is acceptable as proposed since there will be no change in the facility production or the total allowable emissions. Specific Condition No. 3 will be changed as follows:

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

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

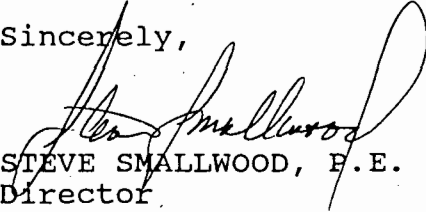
To: The total permitted VOC emissions from coatings and organic solvents shall not exceed the following limits:

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

Mr. Dean E. Pusch
Page 2 of 2

This letter must be attached to the above mentioned permit and shall become a part of that permit.

Sincerely,



STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/TH/plm

Attachment to be Incorporated

Mr. Dean Pusch's letter of January 10, 1992

c: Andrew Kutyna, NED
Shannon Baruck, NED
J. Hauser, EPA

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 Fee will provide you the signature of the person delivered to and the date of delivery		I also wish to receive the following services (for an extra fee): 1. <input checked="" type="checkbox"/> Addressee's Address 2. <input checked="" type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. Dean E. Pusch Sr. Environmental Scientist Anheuser-Busch Companies Executive Offices One Busch Place St. Louis, MO 63118-1852 <i>D. E. Pusch</i>	4a. Article Number P 832 538 779	4b. Service Type <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input checked="" type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature (Addressee) <i>Anheuser-Busch</i>	6. Signature (Agent)	7. Date of Delivery 8. Addressee's Address (Only if requested and fee is paid)
PS Form 3811, November 1990 U.S. GPO: 1991-287-066		DOMESTIC RETURN RECEIPT

P 832 538 779



Certified Mail Receipt

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

Sent to	
Mr. Dean E. Pusch, A-B Co.	
Street & No.	
One Busch Place	
P.O., State & ZIP Code	
St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 2-21-92	
Permit: AC 01-185835	
PSD-FL-153	

PS Form 3800, June 1990



ANHEUSER-BUSCH COMPANIES

February 5, 1992

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

RECEIVED
 FEB 10 1992
 Division of Air
 Resources Management

**RE: Metal Container Corporation - Gainesville
 Lid Plant, DER File No. AC01-185835**

The continued availability of the end sealant currently used at the Gainesville Lid Plant is questionable. In order to have an available alternative, if needed, Metal Container Corporation requests approval from the Department to use a different end sealant compound/solvent combination. In order to change end sealant, the plant's lid customer must test and approve lids having the new compound. Metal Container Corporation will produce 25 million lids, or about eight days production, for this "trial".

The proposed compound has a lower VOC content and a lower density than the compound currently being used in production. Its n-hexane content of 26% is also lower than that of the current compound (30%). An additional solvent that is mist applied to clean the lid liners is required with this compound. MSDS's for the compound and the solvent are attached, as well as an EPA VOC Data Sheet for the compound.

The attached spreadsheet shows that there will be no increase in emissions during the trial run above the emissions from production of the same quantity of lids using the current compound.

Metal Container Corporation requests approval from the Department to utilize the additional required solvent during the compound trial run. Given the urgency in obtaining customer approval of the new compound, a rapid response to this letter would be greatly appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES

D. E. Pusch
 D. E. Pusch
 Environmental Affairs

DEP/tms
 Attachment

2/11
@Leul & John:
Do you see
any problem
with this new
compared, regarding
toxics? Let me
know. ~~resp~~ ^{re: resp}

Teresa 2/10/92
This looks OK!
I agree with you
Peter

Teresa
No obvious new
air toxics problems
FSG
2/13



ANHEUSER-BUSCH COMPANIES

January 10, 1992

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

RECEIVED
JAN 21 1992
Division of Air
Resources Management

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

Dear Ms. Heron:

In order to optimize production capabilities at its Gainesville Lid Plant, Metal Container Corporation plans to operate three conversion presses as part of Module 6 and two conversion presses as part of Module 7. The plant configuration, identified in the referenced permit and the application, shows two presses on Module 6 and three on Module 7.

There will be no change in facility production or emissions that were previously represented and that are allowed by the permit. The only change is relocation of one conversion press and "reassignment" of it's emissions to Module 6 from Module 7.

A marked up version of the emissions summary table (originally submitted to DER April 25, 1991) is attached to show the "exchange" of the conversion press to Module 6 from Module 7. Also attached is a marked up version of Specific Condition 3 of the permit that reflects the switch in emission limits.

Please call me at 314/577-4162 if you have any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Sr. Environmental Scientist
Attachment

cc: J. Heron
A. Kutyma, DE list
G. Harper, EPA

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

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

- 1. *Steve Smallwood*
- 2. *OHF*
- 3.
- 4.

Remarks:

Permit, amendment letter for your signature.

From:

C. Jones

Date

2/11

Phone

**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 2	1800	5400 3600	2.659 billion 1.773 billion
6	2 3	1800	3600 5400	1.773 billion 2.659 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

Coating/Solvent Specifications

<u>compound</u>	<u>typical mfg ident</u>	<u>density [lb/gal]</u>	<u>VOC content [wt frax]</u>	<u>usage rate [gal/1000lids]</u>
end sealant	DM 2140	7.82	0.405	0.0169
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 6.1	37.5 25.0
Texsolve C	4.7	19.3
Amsco 1241	0.4 0.3	1.6 1.1
total	32.9 29.8	135.2 122.1

	pounds/hr	tons/yr
Module 6		
end sealant	18.7	76.8
tab lube	6.1 9.1	25.0 37.5
Texsolve C	4.7	19.3
Amsco 1241	0.9 0.4	1.1 1.6
total	29.8 32.9	122.1 135.2

Module 5		
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

Module 4		
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

Off-line Conversion Presses		
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

Entire Facility		
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

09-Jan-92
01:33 PM

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

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

<u>Pollutant</u>	<u>No-Threat Levels</u> (ug/m3)		
	<u>8-hr</u>	<u>24-hr</u>	<u>Annual</u>
n-hexane	1,800	430	--
n-heptane	32,000	15,238	--
cyclohexane	1,000	238	--
cyclohexylmethane	32,000	7,619	--
toluene	--	--	2,000
benzene	--	--	0.123
stoddard solvent	5,250	1,250	--

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

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

Operating Requirements

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

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

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

**METAL CONTAINER CORPORATION
 GAINESVILLE LID PLANT
 END COMPOUND TRIAL**

VOC Emissions Basis

lid production 25 million
 usage rates 1989 & 1990 actual

Coating/Solvent Specifications

<u>compound</u>	<u>typical mfg ident</u>	<u>density [lb/gal]</u>	<u>VOC content [wt frac]</u>	<u>usage rate [gal/1000lids]</u>
proposed				
end sealant	Darex S 9384	7.80	0.392	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
	Exxon Isopar H	6.33	1.000	0.0003
current				
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

Emissions from Production of 25 million Lids (in tons)

	<u>Proposed</u>	<u>Current</u>
end sealant	0.646	0.669
tab lube	0.353	0.353
solvents	0.206	0.183
total	1.204	1.205

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
COATING SUPPLIER
VOC DATA SHEET

Coating Manufacturer: W. R. Grace & Company, Dewey and Almy Chemical Division

Coating Identification: DAREX EXP CMPD S9384

Batch Identification: ---

Supplied To: Metal Container Corporation

Properties of the coating as supplied* to the customer:

A. Coating Density (D_c)_s: 7.8 lb/gal 0.9 kg/l
(ASTM D1475)

B. Total Volatiles (W_v)_s: 39.5 Weight Percent
 ASTM D2369 Other**

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

2. (V_w)_s 0.3 Volume Percent

Calculated Other**

D. Organic Volatiles (W_o)_s: 39.2 Weight Percent

E. Nonvolatiles Content (V_n)_s: 46.3 Volume Percent

F. VOC Content (VOC)_s: 3.1 lb/gal less water 0.4 kg/l less water
and 6.7 lb/gal solids 0.8 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.
**Method identified under "Remarks".

Signed: C. A. Medina Date: 9/24/91

SAFETY DATA

W. R. GRACE & CO. - CONN.
 DEWEY AND ALMY CHEMICAL DIVISION
 55 HAYDEN AVENUE
 LEXINGTON, MA 02173

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EMERGENCY PHONE NO. (617) 861-8600

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

PRODUCT (TRADE) NAME: DAREX CMPD S9384

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>
n-hexane	26 approx.	50	50
other hexanes	10 approx.	500 (1000 STEL)	500 (1000 STEL)
ethyl alcohol	4 approx.	1000	1000

* 29 CFR Section 1910.1000, July 1, 1991

** 1991-1992 recommendation, American Conference of Governmental Industrial Hygienists

Other Ingredients % by Weight
 Rubber, resin, filler, pigment, and modifiers (including water). 60 approx.

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

Vapor density of n-hexane (air=1): 3.0 Specific Gravity (water=1): 0.9 approx
Solubility in water: not soluble Volatiles, including water (% by weight): 40 approx.
Appearance and Odor: Gray liquid; petroleum solvent odor

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

Flash Point: below 20°F (Pensky-Martens)
Flammable Limits (n-hexane): 1.1 - 7.5%
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.

*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

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DAREX CMPD S9384

SECTION VI-SPILL OR LEAK PROCEDURES

Handling Precautions: See Section VIII.

For small spills: Wipe up, or absorb with sand or other absorbent material. Collect waste in sealed containers.

For large spills: Dike area to prevent spreading. Shovel or pump to drum or salvage tank. Absorb residual material with sand, or other absorbent material.

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

EPA Hazardous Waste Number is: D001

SECTION VII-HEALTH HAZARD DATA

Threshold Limit Values: See Section II.

Signs & Symptoms of Acute Exposure

Emergency First Aid Procedures

Inhalation: Vapors can produce headache, nausea, dizziness, disorientation, numbness in fingers and toes, and irritation of nose and throat.

Remove to fresh air.

Eyes: Irritation upon direct contact.

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

Skin: Irritation upon direct contact.

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

Ingestion: Harmful if swallowed.

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

Chronic Effects: Prolonged or repeated overexposure to the solvent system by inhalation can produce central nervous system depression and/or nerve damage. Prolonged or repeated overexposure by skin contact can produce dermatitis.

Medical Conditions Aggravated by Overexposure: Preexisting nervous system disorders and skin diseases may be aggravated.

GET MEDICAL ATTENTION IF SYMPTOMS PERSIST

PREPARED 01/31/92

PAGE : 2 OF 3

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

SAFETY DATA

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DAREX CMPD S9384

~~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 01/31/92

PAGE : 3 OF

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EXXON
CHEMICAL

MATERIAL SAFETY DATA SHEET

 EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
 A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION

ISOPAR H

 PAGE: 1
 DATE PREPARED: MAY 22, 1991
 NO.: 92839640

SECTION 1 PRODUCT IDENTIFICATION & EMERGENCY INFORMATION

PRODUCT NAME: ISOPAR H

CHEMICAL NAME:

Not Applicable: Blend

CAS 64742-48-9

CHEMICAL FAMILY:

Synthetic Isoparaffinic Hydrocarbon

PRODUCT DESCRIPTION:

Clear colorless liquid.

EMERGENCY TELEPHONE NUMBERS: EXXON CHEMICAL AMERICAS
 CHEMTREC

 713-870-6000
 800-424-9300

SECTION 2 HAZARDOUS INGREDIENT INFORMATION

This product is hazardous as defined in 29 CFR 1910.1200.

OSHA HAZARD
 Combustible

For additional information see Section 3.

SECTION 3 HEALTH INFORMATION & PROTECTION

NATURE OF HAZARD

EYE CONTACT:

Slightly irritating but does not injure eye tissue.

SKIN CONTACT:

Frequent or prolonged contact may irritate and cause dermatitis.

Low order of toxicity.

Skin contact may aggravate an existing dermatitis condition.

INHALATION:

High vapor/aerosol concentrations (greater than approximately 1000 ppm) are irritating to the eyes and the respiratory tract, may cause headaches, dizziness, anesthesia, drowsiness, unconsciousness, and other central nervous system effects, including death.

INGESTION:

Small amounts of this product aspirated into the respiratory system during ingestion or vomiting may cause mild to severe pulmonary injury, possibly progressing to death.

Minimal toxicity.

FIRST AID

EYE CONTACT:

Flush eyes with large amounts of water until irritation subsides. If irritation persists, get medical attention.

SKIN CONTACT:

Flush with large amounts of water; use soap if available.

Remove grossly contaminated clothing, including shoes, and launder before reuse.



MATERIAL SAFETY DATA SHEET

EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION

ISOPAR H

PAGE: 2
DATE PREPARED: MAY 22, 1991
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INHALATION:

Using proper respiratory protection, immediately remove the affected victim from exposure. Administer artificial respiration if breathing is stopped. Keep at rest. Call for prompt medical attention.

INGESTION:

If swallowed, DO NOT induce vomiting. Keep at rest. Get prompt medical attention.

ACUTE TOXICITY DATA IS AVAILABLE UPON REQUEST.

WORKPLACE EXPOSURE LIMITS

EXXON RECOMMENDS THE FOLLOWING OCCUPATIONAL EXPOSURE LIMITS:

300 ppm total hydrocarbon based on composition.

PRECAUTIONS

SPECIAL PRECAUTIONS:

Health studies have shown that many petroleum hydrocarbons pose potential human health risks which may vary from person to person. As a precaution, exposure to liquids, vapors, mists or fumes should be minimized.

PERSONAL PROTECTION:

For open systems where contact is likely, wear safety glasses with side shields, long sleeves, and chemical resistant gloves.

Where contact may occur, wear safety glasses with side shields.

Where concentrations in air may exceed the limits given in this Section and engineering, work practice or other means of exposure reduction are not adequate, NIOSH/MSHA approved respirators may be necessary to prevent overexposure by inhalation.

VENTILATION:

The use of mechanical dilution ventilation is recommended whenever this product is used in a confined space, is heated above ambient temperatures, or is agitated.

CHRONIC EFFECTS:

Laboratory animal studies have shown that prolonged and repeated inhalation exposure to light hydrocarbon vapors in the same naphtha boiling range as this product can produce adverse kidney effects in male rats. However, these effects were not observed in similar studies with female rats and male and female mice and in limited studies with other animal species. Additionally, in a number of human studies, there was no clinical evidence of such effects at normal occupational levels. It is therefore highly unlikely that the kidney effects observed in male rats have significant implications for humans exposed at or below recommended vapor limits in the workplace.

CHRONIC TOXICITY DATA IS AVAILABLE UPON REQUEST

SECTION 4 FIRE & EXPLOSION HAZARD

FLASHPOINT: 120 Deg F. METHOD: TCC NOTE: Minimum

FLAMMABLE LIMITS: LEL: 0.6 UEL: 7.0

AUTOIGNITION TEMPERATURE: 660 Deg F. NOTE: Greater than; ASTM D 2155



MATERIAL SAFETY DATA SHEET

EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION

ISOPAR H

PAGE: 3
DATE PREPARED: MAY 22, 1991
NO.: 92839640

GENERAL HAZARD:

Combustible Liquid, can form combustible mixtures at temperatures at or above the flashpoint.
Static Discharge, material can accumulate static charges which can cause an incendiary electrical discharge.
"Empty" containers retain product residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND, OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION; THEY MAY EXPLODE AND CAUSE INJURY OR DEATH.
Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner, or properly disposed of.

FIRE FIGHTING:

Use water spray to cool fire exposed surfaces and to protect personnel.
Isolate "fuel" supply from fire.
Use foam, dry chemical, or water spray to extinguish fire.
Avoid spraying water directly into storage containers due to danger of boilover.
This liquid is volatile and gives off invisible vapors. Either the liquid or vapor may settle in low areas or travel some distance along the ground or surface to ignition sources where they may ignite or explode.

HAZARDOUS COMBUSTION PRODUCTS:

No unusual

SECTION 5 SPILL CONTROL PROCEDURE

LAND SPILL:

Eliminate sources of ignition. Prevent additional discharge of material, if possible to do so without hazard. For small spills implement cleanup procedures; for large spills implement cleanup procedures and, if in public area, keep public away and advise authorities. Also, if this product is subject to CERCLA reporting (see Section 7) notify the National Response Center.
Prevent liquid from entering sewers, watercourses, or low areas. Contain spilled liquid with sand or earth. Do not use combustible materials such as sawdust.
Recover by pumping (use an explosion proof or hand pump) or with a suitable absorbent.
Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.

WATER SPILL:

Remove from surface by skimming or with suitable adsorbents. If allowed by local authorities and environmental agencies, sinking and/or suitable dispersants may be used in non-confined waters.
Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.

EXXON
CHEMICAL**MATERIAL SAFETY DATA SHEET**EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION

ISOPAR H

PAGE: 4
DATE PREPARED: MAY 22, 1991
NO.: 92839640**SECTION 6 NOTES****HAZARD RATING SYSTEMS:**

This information is for people trained in:
National Paint & Coatings Association's (NPCA)
Hazardous Materials Identification System (HMIS)
National Fire Protection Association (NFPA 704)
Identification of the Fire Hazards of Materials

	NPCA-HMIS	NFPA 704	KEY
HEALTH	2	2	4 = Severe
FLAMMABILITY	2	2	3 = Serious
REACTIVITY	1	1	2 = Moderate
			1 = Slight
			0 = Minimal

SECTION 7 REGULATORY INFORMATION**DEPARTMENT OF TRANSPORTATION (DOT):****DOT PROPER SHIPPING NAME:**

PETROLEUM NAPHTHA, Combustible Liquid UN 1255

DOT HAZARD CLASS: Combustible Liquid**DOT IDENTIFICATION NUMBER:** UN 1255

NAME: Naphtha, petroleum

TSCA:

This product is listed on the TSCA Inventory at CAS Registry Number 64742-48-9

CERCLA:

If this product is accidentally spilled, it is not subject to any special reporting under the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). We recommend you contact local authorities to determine if there may be other local reporting requirements.

SARA TITLE III:

Under the provisions of Title III, Sections 311/312 of the Superfund Amendments and Reauthorization Act, this product is classified into the following hazard categories:

Delayed Health, Fire.

SECTION 8 TYPICAL PHYSICAL & CHEMICAL PROPERTIES**SPECIFIC GRAVITY:**

0.76 at 60

6.3

SOLUBILITY IN WATER, WT. % AT °F:

Less than 0.10 at 68

SP. GRAV. OF VAPOR, at 1 atm (Air=1):

5.51

EVAPORATION RATE, n-Bu Acetate=1:

0.1

VAPOR PRESSURE, mmHg at °F:

1 at 68

3 at 100

VISCOSITY OF LIQUID, CST AT °F:

1 at 77

2 at 61

FREEZING/MELTING POINT, °F:

Less than 32

BOILING POINT, °F:

335 to 380 Approximately

FLASH POINT

120°F

MW = 152

EXXON (ALL) 1/1

EXXON
CHEMICAL**MATERIAL SAFETY DATA SHEET**EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A DIVISION OF EXXON CHEMICAL COMPANY, A DIVISION OF EXXON CORPORATION

ISOPAR H

PAGE: 5
DATE PREPARED: MAY 22, 1991
NO.: 92839640**SECTION 9 REACTIVITY DATA****STABILITY:**

Stable

HAZARDOUS POLYMERIZATION:

Will not occur

CONDITIONS TO AVOID INSTABILITY:

Not Applicable

MATERIALS AND CONDITIONS TO AVOID INCOMPATIBILITY:

Strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:

None

SECTION 10 STORAGE AND HANDLING**ELECTROSTATIC ACCUMULATION HAZARD:**

Yes, use proper grounding procedure

STORAGE TEMPERATURE, °F:

Ambient

LOADING/UNLOADING TEMPERATURE, °F:

Ambient

STORAGE/TRANSPORT PRESSURE, mmHg:

Atmospheric

VISC. AT LOADING/UNLOADING TEMP., CST:

2

REVISION SUMMARY:

Since MAY 9, 1991 this MSDS has been revised in Section(s):

3, 4

REFERENCE NUMBER:

HDHA-C-25036

DATE PREPARED:

May 22, 1991

SUPERSEDES ISSUE DATE:

May 9, 1991

FOR ADDITIONAL PRODUCT INFORMATION, CONTACT YOUR TECHNICAL SALES REPRESENTATIVE
FOR ADDITIONAL HEALTH/SAFETY INFORMATION, CALL 713-870-6885

THIS INFORMATION RELATES TO THE SPECIFIC MATERIAL DESIGNATED AND MAY NOT BE VALID FOR SUCH MATERIAL USED IN COMBINATION WITH ANY OTHER MATERIALS OR IN ANY PROCESS. SUCH INFORMATION IS TO THE BEST OF OUR KNOWLEDGE AND BELIEF, ACCURATE AND RELIABLE AS OF THE DATE COMPILED. HOWEVER, NO REPRESENTATION, WARRANTY OR GUARANTEE IS MADE AS TO ITS ACCURACY, RELIABILITY OR COMPLETENESS. IT IS THE USER'S RESPONSIBILITY TO SATISFY HIMSELF AS TO THE SUITABILITY AND COMPLETENESS OF THIS INFORMATION FOR HIS OWN PARTICULAR USE. WE DO NOT ACCEPT LIABILITY FOR ANY LOSS OR DAMAGE THAT MAY OCCUR FROM THE USE OF THIS INFORMATION NOR DO WE OFFER WARRANTY AGAINST PATENT INFRINGEMENT.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 COATING SUPPLIER
 VOC DATA SHEET

Coating Manufacturer: W. R. Grace & Company, Dewey and Almy Chemical Division

Coating Identification: DAREX EXP CMPD S9384

Batch Identification: ---

Supplied To: Metal Container Corporation

 Properties of the coating as supplied* to the customer:

A. Coating Density (D_c)_s: 7.8 lb/gal 0.9 kg/l

(ASTM D1475)

B. Total Volatiles (W_v)_s: 39.5 Weight Percent

ASTM D2369 Other**

C. Water Content: 1. (W_w)_s 0.3 Weight Percent

ASTM D3792 ASTM D4017 Other**

2. (V_w)_s 0.3 Volume Percent

Calculated Other**

D. Organic Volatiles (W_o)_s: 39.2 Weight Percent

E. Nonvolatiles Content (V_n)_s: 46.3 Volume Percent

F. VOC Content (VOC)_s: 3.1 lb/gal less water 0.4 kg/l less water

and 6.7 lb/gal solids 0.8 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.
 **Method identified under "Remarks".

Signed: C. A. Muelner Date: 9/24/91

SAFETY DATA

W. R. GRACE & CO. - CONN.
 DEWEY AND ALMY CHEMICAL DIVISION
 55 HAYDEN AVENUE
 LEXINGTON, MA 02173

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EMERGENCY PHONE NO. (617) 861-6600

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

PRODUCT (TRADE) NAME: DAREX CMPD S9384

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>
n-hexane	26 approx.	50	50
other hexanes	10 approx.	500 (1000 STEL)	500 (1000 STEL)
ethyl alcohol	4 approx.	1000	1000

* 29 CFR Section 1910.1000, July 1, 1991
 ** 1991-1992 recommendation, American Conference of Governmental Industrial Hygienists

<u>Other Ingredients</u>	<u>% by Weight</u>
Rubber, resin, filler, pigment, and modifiers (including water).	60 approx.

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

Vapor density of n-hexane (air=1): 3.0 Specific Gravity (water=1): 0.9 approx
Solubility in water: not soluble Volatiles, including water (% by weight): 40 approx.
Appearance and Odor: Gray liquid; petroleum solvent odor

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

Flash Point: below 20°F (Pensky-Martens)
Flammable Limits (n-hexane): 1.1 - 7.5%
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.

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SAFETY DATA

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DAREX CMPD S9384

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 01/31/92

PAGE : 2 OF 3

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

SAFETY DATA

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DAREX CMPD S9384

~~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 01/31/92

PAGE 1 3 OF

EXXON
CHEMICAL**MATERIAL SAFETY DATA SHEET**EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION

ISOPAR H

PAGE: 1
DATE PREPARED: MAY 22, 1991
NO.: 92839640**SECTION 1 PRODUCT IDENTIFICATION & EMERGENCY INFORMATION****PRODUCT NAME:** ISOPAR H**CHEMICAL NAME:**

Not Applicable: Blend

CAS 64742-48-9

CHEMICAL FAMILY:

Synthetic Isoparaffinic Hydrocarbon

PRODUCT DESCRIPTION:

Clear colorless liquid.

EMERGENCY TELEPHONE NUMBERS: EXXON CHEMICAL AMERICAS
CHEMTREC713-870-6000
800-424-9300**SECTION 2 HAZARDOUS INGREDIENT INFORMATION**

This product is hazardous as defined in 29 CFR 1910.1200.

OSHA HAZARD
Combustible

For additional information see Section 3.

SECTION 3 HEALTH INFORMATION & PROTECTION**NATURE OF HAZARD****EYE CONTACT:**

Slightly irritating but does not injure eye tissue.

SKIN CONTACT:

Frequent or prolonged contact may irritate and cause dermatitis.

Low order of toxicity.

Skin contact may aggravate an existing dermatitis condition.

INHALATION:

High vapor/aerosol concentrations (greater than approximately 1000 ppm) are irritating to the eyes and the respiratory tract, may cause headaches, dizziness, anesthesia, drowsiness, unconsciousness, and other central nervous system effects, including death.

INGESTION:

Small amounts of this product aspirated into the respiratory system during ingestion or vomiting may cause mild to severe pulmonary injury, possibly progressing to death.

Minimal toxicity.

FIRST AID**EYE CONTACT:**

Flush eyes with large amounts of water until irritation subsides. If irritation persists, get medical attention.

SKIN CONTACT:

Flush with large amounts of water; use soap if available.

Remove grossly contaminated clothing, including shoes, and launder before reuse.



MATERIAL SAFETY DATA SHEET

EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION

ISOPAR H

PAGE: 2
DATE PREPARED: MAY 22, 1991
NO.: 92838640

INHALATION:

Using proper respiratory protection, immediately remove the affected victim from exposure. Administer artificial respiration if breathing is stopped. Keep at rest. Call for prompt medical attention.

INGESTION:

If swallowed, DO NOT induce vomiting. Keep at rest. Get prompt medical attention.

ACUTE TOXICITY DATA IS AVAILABLE UPON REQUEST.

WORKPLACE EXPOSURE LIMITS

EXXON RECOMMENDS THE FOLLOWING OCCUPATIONAL EXPOSURE LIMITS:

300 ppm total hydrocarbon based on composition.

PRECAUTIONS

SPECIAL PRECAUTIONS:

Health studies have shown that many petroleum hydrocarbons pose potential human health risks which may vary from person to person. As a precaution, exposure to liquids, vapors, mists or fumes should be minimized.

PERSONAL PROTECTION:

For open systems where contact is likely, wear safety glasses with side shields, long sleeves, and chemical resistant gloves. Where contact may occur, wear safety glasses with side shields. Where concentrations in air may exceed the limits given in this Section and engineering, work practice or other means of exposure reduction are not adequate, NIOSH/MSHA approved respirators may be necessary to prevent overexposure by inhalation.

VENTILATION:

The use of mechanical dilution ventilation is recommended whenever this product is used in a confined space, is heated above ambient temperatures, or is agitated.

CHRONIC EFFECTS:

Laboratory animal studies have shown that prolonged and repeated inhalation exposure to light hydrocarbon vapors in the same naphtha boiling range as this product can produce adverse kidney effects in male rats. However, these effects were not observed in similar studies with female rats and male and female mice and in limited studies with other animal species. Additionally, in a number of human studies, there was no clinical evidence of such effects at normal occupational levels. It is therefore highly unlikely that the kidney effects observed in male rats have significant implications for humans exposed at or below recommended vapor limits in the workplace.

CHRONIC TOXICITY DATA IS AVAILABLE UPON REQUEST

SECTION 4 FIRE & EXPLOSION HAZARD

FLASHPOINT: 120 Deg F. METHOD: TCC NOTE: Minimum

FLAMMABLE LIMITS: LEL: 0.6 UEL: 7.0

AUTOIGNITION TEMPERATURE: 660 Deg F. NOTE: Greater than; ASTM D 2155

EXXON
CHEMICAL**MATERIAL SAFETY DATA SHEET**EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION**ISOPAR H**PAGE: 3
DATE PREPARED: MAY 22, 1991
NO.: 92839640**GENERAL HAZARD:**

Combustible Liquid, can form combustible mixtures at temperatures at or above the flashpoint.
Static Discharge, material can accumulate static charges which can cause an incendiary electrical discharge.
"Empty" containers retain product residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND, OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION; THEY MAY EXPLODE AND CAUSE INJURY OR DEATH.
Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner, or properly disposed of.

FIRE FIGHTING:

Use water spray to cool fire exposed surfaces and to protect personnel. Isolate "fuel" supply from fire.
Use foam, dry chemical, or water spray to extinguish fire.
Avoid spraying water directly into storage containers due to danger of boilover.
This liquid is volatile and gives off invisible vapors. Either the liquid or vapor may settle in low areas or travel some distance along the ground or surface to ignition sources where they may ignite or explode.

HAZARDOUS COMBUSTION PRODUCTS:

No unusual

SECTION 5 SPILL CONTROL PROCEDURE**LAND SPILL:**

Eliminate sources of ignition. Prevent additional discharge of material, if possible to do so without hazard. For small spills implement cleanup procedures; for large spills implement cleanup procedures and, if in public area, keep public away and advise authorities. Also, if this product is subject to CERCLA reporting (see Section 7) notify the National Response Center.
Prevent liquid from entering sewers, watercourses, or low areas. Contain spilled liquid with sand or earth. Do not use combustible materials such as sawdust.
Recover by pumping (use an explosion proof or hand pump) or with a suitable absorbent.
Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.

WATER SPILL:

Remove from surface by skimming or with suitable adsorbents. If allowed by local authorities and environmental agencies, sinking and/or suitable dispersants may be used in non-confined waters.
Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.



MATERIAL SAFETY DATA SHEET

EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A Division of EXXON CHEMICAL COMPANY, A Division of EXXON CORPORATION

ISOPAR H

PAGE: 4
DATE PREPARED: MAY 22, 1991
NO.: 92838640

SECTION 6 NOTES

HAZARD RATING SYSTEMS:

This information is for people trained in:
National Paint & Coatings Association's (NPCA)
Hazardous Materials Identification System (HMIS)
National Fire Protection Association (NFPA 704)
Identification of the Fire Hazards of Materials

	NPCA-HMIS	NFPA 704	KEY
HEALTH	2	2	4 = Severe
FLAMMABILITY	2	2	3 = Serious
REACTIVITY	1	1	2 = Moderate
			1 = Slight
			0 = Minimal

SECTION 7 REGULATORY INFORMATION

DEPARTMENT OF TRANSPORTATION (DOT):

DOT PROPER SHIPPING NAME:

PETROLEUM NAPHTHA, Combustible Liquid UN 1255

DOT HAZARD CLASS: Combustible Liquid

DOT IDENTIFICATION NUMBER: UN 1255

NAME: Naphtha, petroleum

TSCA:

This product is listed on the TSCA Inventory at CAS Registry Number 64742-48-9

CERCLA:

If this product is accidentally spilled, it is not subject to any special reporting under the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). We recommend you contact local authorities to determine if there may be other local reporting requirements.

SARA TITLE III:

Under the provisions of Title III, Sections 311/312 of the Superfund Amendments and Reauthorization Act, this product is classified into the following hazard categories:

Delayed Health, Fire.

SECTION 8 TYPICAL PHYSICAL & CHEMICAL PROPERTIES

SPECIFIC GRAVITY:

0.76 at 60 ^{6.3}

SOLUBILITY IN WATER, WT. % AT °F:

Less than 0.10 at 68

SP. GRAV. OF VAPOR, at 1 atm (Air=1):

5.51

EVAPORATION RATE, n-Bu Acetate=1:

0.1

VAPOR PRESSURE, mmHg at °F:

1 at 68

3 at 100

VISCOSITY OF LIQUID, CST AT °F:

1 at 77

2 at 61

FREEZING/MELTING POINT, °F:

Less than 32

BOILING POINT, °F:

335 to 380 Approximately

FLASH POINT

120°F

MW = 152

100% VOLATILE

PER EXXON (ALL) 1/11



MATERIAL SAFETY DATA SHEET

EXXON CHEMICAL AMERICAS, P.O. BOX 3272, HOUSTON, TEXAS 77001
A DIVISION OF EXXON CHEMICAL COMPANY, A DIVISION OF EXXON CORPORATION

ISOPAR H

PAGE: 5
DATE PREPARED: MAY 22, 1991
NO.: 92839640

SECTION 9 REACTIVITY DATA

STABILITY:

Stable

HAZARDOUS POLYMERIZATION:

Will not occur

CONDITIONS TO AVOID INSTABILITY:

Not Applicable

MATERIALS AND CONDITIONS TO AVOID INCOMPATIBILITY:

Strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:

None

SECTION 10 STORAGE AND HANDLING

ELECTROSTATIC ACCUMULATION HAZARD:

Yes, use proper grounding procedure

STORAGE TEMPERATURE, °F:

Ambient

LOADING/UNLOADING TEMPERATURE, °F:

Ambient

STORAGE/TRANSPORT PRESSURE, mmHg:

Atmospheric

VISC. AT LOADING/UNLOADING TEMP., cST:

2

REVISION SUMMARY:

Since MAY 9, 1991 this MSDS has been revised in Section(s):

3, 4

REFERENCE NUMBER:

HDHA-C-25036

DATE PREPARED:

May 22, 1991

SUPERSEDES ISSUE DATE:

May 9, 1991

FOR ADDITIONAL PRODUCT INFORMATION, CONTACT YOUR TECHNICAL SALES REPRESENTATIVE
FOR ADDITIONAL HEALTH/SAFETY INFORMATION, CALL 713-870-6885

THIS INFORMATION RELATES TO THE SPECIFIC MATERIAL DESIGNATED AND MAY NOT BE VALID FOR SUCH MATERIAL USED IN COMBINATION WITH ANY OTHER MATERIALS OR IN ANY PROCESS. SUCH INFORMATION IS TO THE BEST OF OUR KNOWLEDGE AND BELIEF, ACCURATE AND RELIABLE AS OF THE DATE COMPILED. HOWEVER, NO REPRESENTATION, WARRANTY OR GUARANTEE IS MADE AS TO ITS ACCURACY, RELIABILITY OR COMPLETENESS. IT IS THE USER'S RESPONSIBILITY TO SATISFY HIMSELF AS TO THE SUITABILITY AND COMPLETENESS OF THIS INFORMATION FOR HIS OWN PARTICULAR USE. WE DO NOT ACCEPT LIABILITY FOR ANY LOSS OR DAMAGE THAT MAY OCCUR FROM THE USE OF THIS INFORMATION NOR DO WE OFFER WARRANTY AGAINST PATENT INFRINGEMENT.

BEST AVAILABLE COPY

bcc: J. W. Sugar
J. V. Stier
J. E. Lambert
B. A. Boeglin
T. J. Leebolt
J. D. Young
J. J. Walters
D. Stewart
M. M. Accardo
J. A. Voda
R. F. Wellise



ANHEUSER-BUSCH COMPANIES

January 10, 1992

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

Re: Metal Container Corporation -
Gainesville Lid Plant
Permit No. AC 01-185835

314-70371032

Dear Ms. Heron:

In order to optimize production capabilities at its Gainesville Lid Plant, Metal Container Corporation plans to operate three conversion presses as part of Module 6 and two conversion presses as part of Module 7. The plant configuration, identified in the referenced permit and the application, shows two presses on Module 6 and three on Module 7.

There will be no change in facility production or emissions that were previously represented and that are allowed by the permit. The only change is relocation of one conversion press and "reassignment" of it's emissions to Module 6 from Module 7.

A marked up version of the emissions summary table (originally submitted to DER April 25, 1991) is attached to show the "exchange" of the conversion press to Module 6 from Module 7. Also attached is a marked up version of Specific Condition 3 of the permit that reflects the switch in emission limits.

Please call me at 314/577-4162 if you have any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch

Dean E. Pusch
Sr. Environmental Scientist
Attachment



ANHEUSER-BUSCH COMPANIES

FACSIMILE TRANSMISSION NO PAGES 4

TO:	T. HERON	PHONE:	904-922-6979
DEPT./CO.:	DER-FLORIDA		
FROM:	D. Pusch	PHONE:	314-577-4162
DEPT./CO.:	ENV. AFFAIRS		
COMMENTS:			

Anheuser-Busch Companies, Inc.
Executive Offices
One Busch Place
St. Louis, MO 63118-1852
Telex 441 100 ANBUSCH STL

ABC-7002 (2-89)

MESSAGE CONFIRMATION

JAN-27-'92 MON 14:48

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-6979

IP	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	HS
01	01-27	14:	00:01:54	9042342032		03	00

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

0684266951

1129M

0684266951

RECIPIENT'S COPY

Date
1/31/92

From (Your Name) Please Print Dan Stewart		Your Phone Number (Very Important) 904-378-8500		To (Recipient's Name) Please Print Fla. Dept. of Environmental Regulation		Recipient's Phone Number (Very Important)	
Company METAL CONTAINER CORP		Department/Floor No.		Company 2600 Blair Stone Road, Twin Towers Bldg.		Department/Floor No.	
Street Address 5909 NW 18TH DRIVE				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.)			
City GAINESVILLE		State FL		City Tallahassee, FL		State	
ZIP Required 32600		ZIP Required 32301					

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)				IF HOLD FOR PICK-UP, Print FEDEX Address Here			
PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card				Street Address			
5 <input type="checkbox"/> Cash 6 <input type="checkbox"/> Check				City			
				State			
				ZIP Required			

SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)		PACKAGES	WEIGHT (in pounds)	Emp. No.	Date	Federal Express Use
11 <input type="checkbox"/> YOUR PACKAGING	51 <input type="checkbox"/> YOUR PACKAGING	1 <input type="checkbox"/> HOLD FOR PICK-UP (if in box 1)	2 <input type="checkbox"/> DELIVER WEEKDAY			<input type="checkbox"/> Cash Received		Base Charges
16 <input checked="" type="checkbox"/> FEDEX LETTER	56 <input type="checkbox"/> FEDEX LETTER *	3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (not available to all locations)	4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge)			<input type="checkbox"/> Return Shipment		Declared Value Charge
12 <input type="checkbox"/> FEDEX PAK *	52 <input type="checkbox"/> FEDEX PAK *	5 <input type="checkbox"/> DRY ICE _____ Lbs.	7 <input type="checkbox"/> OTHER SPECIAL SERVICE _____	Total	Total	<input type="checkbox"/> Third Party <input type="checkbox"/> Chg To Del. <input type="checkbox"/> Chg To Hold		Other 1
13 <input type="checkbox"/> FEDEX BOX	53 <input type="checkbox"/> FEDEX BOX	8 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)				Street Address		Other 2
14 <input type="checkbox"/> FEDEX TUBE	54 <input type="checkbox"/> FEDEX TUBE	9 <input type="checkbox"/> HOLIDAY DELIVERY (in observance) (Extra charge)				City	State	Zip
Economy Two-Day (Delivery by second business day!)		Government Overnight (Restricted by additional rules only)		DIM SHIPMENT (Chargeable Weight)		Received By:		Total Charges
30 <input type="checkbox"/> ECONOMY	46 <input type="checkbox"/> GOVT LETTER			<input type="checkbox"/> _____ lbs.		Date/Time Received		REVISION DATE 1/91 PART #137204 FXEM 4/91 FORMAT #068
Freight Service (for Extra Large & over packages over 150 lbs.)				Received At:		FedEx Employee Number		068 © 1990-91 F.E.C. PRINTED IN U.S.A.
70 <input type="checkbox"/> OVERNIGHT FREIGHT **	80 <input type="checkbox"/> TWO-DAY FREIGHT **			1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input checked="" type="checkbox"/> B60 5 <input type="checkbox"/> Station		Release Signature: _____ Date/Time		



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

007674

CHECK DATE	CHECK NUMBER
1/31/92	007674

VOID 180 DAYS AFTER ISSUANCE

Manufacturers Hanover Bank (Delaware)
 1201 Market Street
 Wilmington, Delaware 19801

62-26
 311
 2339-09

PAY THIS AMOUNT

\$ ***250.00

METAL CONTAINER CORPORATION

TO THE ORDER OF

FLORIDA DEPT. OF ENVIRONMENTAL REGULATION
 2600 Blair Stone Road
 Twin Towers Office Building
 Tallahassee, FL 32301

AUTHORIZED SIGNATURE

L. M. King

AUTHORIZED SIGNATURE



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

007674

CHECK NO.	007674	DATE	1/31/92	VENDOR NO.	
VENDOR	Fl. Dept. of Env. Reg.				

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	GROSS AMOUNT	DISCOUNTS, TAXES, RETENTION	NET AMOUNT
	1/31/92	Modification of Permit # AC01-185835			\$250.00

947
 OF GPL Seams
 2/7 TO BE A
 TRADE!

00103

DETACH BEFORE DEPOSITING

TOTALS



GROSS AMOUNT

NET AMOUNT

\$250.00



ANHEUSER-BUSCH COMPANIES

April 30, 1991

RECEIVED
MAY 6 1991
Division of Air
Resources Management

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

Re: **MCC-Jacksonville Modernization**
DER File AC 01-185835

Dear Ms. Heron:

Specific Condition 5 of the draft permit, which specifies permitted materials and utilization rates, will change based on the April 25, 1991 revisions to the application. The condition should read as follows:

5. The permitted materials and utilization rates are as stated in the application and supporting documents. These rates include but are not limited to:
 - A maximum annual production of 10.047 billion lids,
 - A maximum usage rate (all coatings and solvents) of 0.0241 gallon//1000 lids,
 - A maximum input rate of 9450 lb/hr of aluminum shell and tab stock.

Please call me at (314) 577-4162 with any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Sr. Environmental Scientist
043091

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 next to the article number.

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

- Addressee's Address
- Restricted Delivery
Consult postmaster for fee.

3. Article Addressed to:
Mr. Joseph Water, Plant Manager
Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

4a. Article Number
P 832 539 854

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

7. Date of Delivery
7-1-91

5. Signature (Addressee)

6. Signature (Agent)
Joseph Water

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

PS Form 3811, October 1990 U.S. GPO: 1990-273-861 **DOMESTIC RETURN RECEIPT**

P 832 539 854



Certified Mail Receipt

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

Sent to	
Mr. Joseph Waters, Metal Container Corp.	
Street & No. 5909 N.W. 18th Drive	
P.O., State & ZIP Code Gainesville, FL 32606	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 6-28-91	
Permit: AC 01-185835	
PSD-FL-153	

PS Form 3800, June 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

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


DER File No. AC 01-185835
PSD-FL-153
Alachua County

Enclosed is Permit Number AC 01-185835/PSD-FL-153 to construct/modify the Lid Center at your facility located in Gainesville, Florida. This permit is issued pursuant to Sections 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 the 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 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 6-28-91 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.

Keri Doherty
(Clerk)

6-28-91
(Date)

Copies furnished to:

A. Kutyna, NE Dist.	S. Baruch, NE Dist. Branch
J. Harper, EPA	D. Pusch, A-BC
C. Shaver, NPS	J. Schamburgh, P.E.

Final Determination

Metal Container Corporation
Gainesville, Alachua County, Florida

Permit No. AC 01-185835
PSD-FL-153

Lid Modules 4 through 7

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

June 25, 1991

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct/modify the Gainesville Lid Center facility at the Metal Container Corporation complex in Gainesville, Alachua County, Florida, was distributed on March 21, 1991. The Notice of Intent to Issue was published in The Gainesville Sun on March 30, 1991. Copies of the evaluation were available for public inspection at the Department's Tallahassee and Jacksonville offices.

Comments were received from Mr. Dean E. Pusch, Sr. Environmental Scientist, of Anheuser Busch Companies and Mrs. Marlene Accardo, Manager Environmental Engineering, of Metal Container Corporation. Meetings were held in Tallahassee on April 11 and April 25, 1991, to discuss these comments. These comments referred specifically to the BACT determination and the permit specific conditions. Attendees were Clair Fancy, Barry Andrews, Dean E. Pusch, Marlene Accardo, and Teresa Heron. As a result of the meetings, the BACT determination was revisited and the Technical Evaluation and Preliminary Determination was modified. Some of the permit's specific conditions have been modified in accordance with the revised BACT determination and other comments made by the applicant (See company's letters (attached) dated April 23 and April 25, 1991).

The following specific conditions will be modified:

Specific Condition No. 1

FROM:

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

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

Clean up Solvent: 6.32 lbs VOC and 4.35 lbs VOC
gal mineral spirits gal hexane

TO:

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

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

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

Specific Condition No. 3

FROM:

The total permitted VOC emissions from coatings and organic solvents for the entire facility shall not exceed 87.6 lbs per hour and 384 tons per year.

TO:

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

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

Specific Condition No. 5

FROM:

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

- A maximum annual production of 11.445 billion lids.
- A maximum usage rate (all coatings and solvents) of 0.0248 gallons/1000 lids.
- A maximum input rate of 9510 lbs/hr aluminum shell and tab stock.

TO:

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

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

Specific Conditions Nos. 7 and 8

These conditions will be deleted.

Specific Condition No. 9

This condition will be modified and renumbered:

FROM:

The permittee or the coating manufacturer shall determine the VOC content of each coating using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A, and adopted by reference in F.A.C. Rule 17-2.700. 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 coatings or the same 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 (not included in the application) requires prior written notification. Notification shall be provided to the Northeast District office and shall include EPA Method 24 or Appendix B test results. Testing procedures shall be consistent with the requirements of F.A.C. Rule 17-2.700.

TO:

7. The permittee or the coating manufacturer shall determine the VOC content of each coating using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A, and adopted by reference in F.A.C. Rule 17-2.700. 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 coatings or the same 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. 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 the requirements of F.A.C. Rule 17-2.700.

Specific Condition No. 12

This condition will be modified and renumbered:

FROM:

The permittee shall maintain accurate recordkeeping of all paints and solvents in operation at the facility for at least a two year period.

Specific Condition No. 12 cont'd

TO:

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

Specific Condition No. 11

This condition will be modified and renumbered:

FROM:

The permittee shall maintain a record of the clean up solvents used and the waste solvents hauled off site on a quarterly basis. A composite sample of the VOC content in the waste solvents shall be established once per quarter using Method 24 or 24A.

TO:

9. 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 Method 24 or 24A.

The final action of the Department will be to issue construction permit AC 01-185835 and PSD-FL-153 with the changes stated in this Final Determination.



ANHEUSER-BUSCH COMPANIES

RECEIVED

JUN 27 1991

June 24, 1991

Division of Air
Resources Management

Mr. Barry Andrews, P.E., Administrator
Permitting and Standards Section
Bureau of Air Regulation
Florida Department of Environmental Regulations
2600 Blair stone Road
Tallahassee, Florida 32399-2400

Re: **Metal Container Corporation
Gainesville Lid Plant Modernization
Draft Final Conditions**

Dear Mr. Andrews:

I have reviewed the current conditions for the Gainesville project and offer the following comments:

Specific Condition No. 7

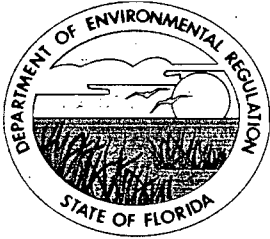
This condition requires that the Northeast District be notified prior to "use of a different coating not included in the application...." Since different coatings are used often, Metal Container Corporation requests that the condition be modified to require notification only in the event that the VOC content of a coating increases above that of the previously used coating. This condition would then be consistent with a similar condition contained in the recently issued permit for Metal Container's Jacksonville can plant.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Sr. Environmental Scientist

DEP:cd
0624



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Metal Container Corp.
5909 NW 18th Drive
Gainesville, Florida 32606

Permit Number: AC 01-185835
Expiration Date: January 30, 1993
County: Alachua
Latitude/Longitude: 29°42'5"
82°20'53"
Project: Lid Modules 4 thru 7

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the 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, DER Form 17-1.122(16), received on August 31, 1990.
2. Department's letter dated September 28, 1990.
3. Metal Container Corporation's letters dated October 5, November 6, and December 24, 1990; January 15, April 19, April 23, April 25, and June 24, 1991.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

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, Florida Statutes. 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), Florida Statutes, 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 acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, 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 Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

GENERAL CONDITIONS:

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.

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.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

GENERAL CONDITIONS:

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 Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, 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.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

GENERAL CONDITIONS:

- 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;
 - 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:

Emission Limits

1. 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

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

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

Pollutant	No-Threat Levels (ug/m3)		
	8-hr	24-hr	Annual
n-hexane	1,800	430	--
n-heptane	32,000	15,238	--
cyclohexane	1,000	238	--
cyclohexylmethane	32,000	7,619	--
toluene	--	--	2,000
benzene	--	--	0.123
stoddard solvent	5,250	1,250	--

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

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

Operating Requirements

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

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

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

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

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 or the coating manufacturer shall determine the VOC content of each coating using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A, and adopted by reference in F.A.C. Rule 17-2.700. 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 coatings or the same 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. 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 the requirements of F.A.C. Rule 17-2.700.

8. Compliance with the acceptable ambient 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. Ambient monitoring may be used in addition to modeling. These calculations shall be available upon request by the Department.

9. 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 Method 24 or 24A.

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

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

11. The permittee shall notify the Northeast District office in writing at least 30 days prior to any 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 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 17-2, 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 17-2 and 17-4, 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 (F.A.C. Rule 17-2.210(1)).

15. According to F.A.C. Rule 17-2.620(1)(a), 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 crew efficiency to minimize pollutant emissions. 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 use;
- o all fittings, valve lines etc., shall be properly maintained; and,
- o all VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

16. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.620(2).

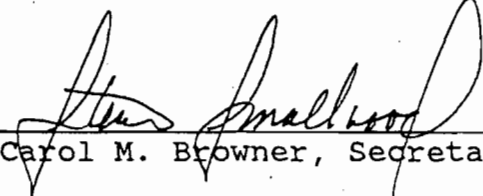
17. Pursuant to F.A.C. Rule 17-2.210(2), Air Operating Permits, the permittee shall be required to submit annual reports on the actual operation and emissions of the facility. Material balance reports are required and shall be sent to the Northeast District office to assess emissions and maintain VOC emissions inventory. The quantity of lids processed per module shall be included in the report. This report shall also include but not be limited to VOC limits (lbs/hr, lbs/day, lbs/month, tons/yr), manufacturer's certification, 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 BAR prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

19. An application for an operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant 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 (F.A.C. 17-4.220).

Issued this 28th day
of June, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

fm 

Carol M. Browner, Secretary

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

The applicant intends to modernize their aluminum lid manufacturing facility in Gainesville, Florida. The modernization will result in an increase in the facility's annual production, from an existing 6.528 billion lids to 10.047 billion lids. This increase in production will result in an annual potential increase of 161 tons of volatile organic compound emissions above the currently permitted 323 tons. Potential VOC emissions will be minimized through the use of low-solvent, high solids compounds.

In accordance with Rule 17-2.500(2)(f)(3) of the Florida Administrative Code (F.A.C.) a BACT review for volatile organic compounds 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:

Compound	VOC Content (weight fraction)
End Sealant	0.4048
Tab Lube	0.945
Solvents	1.0

Date Receipt of a BACT Application:

December 24, 1990

Review Group Members:

This determination was based upon comments received from the applicant and the Permitting and Standards Section.

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 17-2, 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 modernization project (VOC content equals 3.2 pounds/gallon).

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 compound,
2. collection and destruction of VOC emissions through the use of thermal incineration.

Both of these technologies were assessed from the standpoint of being control technology for the new modules to be added as part of the modernization. The two existing modules which remain will continue to operate using the existing high solid/low-solvent compound as they are currently permitted.

Water-Based End Sealant:

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

According to the applicant, water-base 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. In addition, the applicant's experience with water-base end sealant has shown significantly lower production efficiency than with low solvent/high solids sealant due to equipment downtime from tooling build-up and high spoilage rates.

In order to meet committed production quotas from this facility, additional equipment would be required if water-base sealant was used. A liner, dryer, balancer, conversion press, counter/bagger, and conveying equipment would be the minimum additional equipment required, as well as a new additional water-base compound bulk storage and delivery system.

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 \$1.34 million. When this cost is taken into consideration with the annual VOC reductions that would be realized by using water-base end sealant compound (191 tons per year) the cost per ton of controlling VOC's would be \$7,016.

This cost (\$7,016/ton) is not representative of costs that have been previously justified as BACT and is judged to be cost prohibitive 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 and ducting the VOC's which are "flashed-off" during the manufacturing process to an incinerator.

The applicant has stated that the lid manufacturing process does not easily lend itself to the capture of VOC due to the nature of the compounds used and the speed at which the ends pass through

thelines. 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 14 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 on the tab lube emissions. Based on the data of 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, however, be minimized by automated controls on the presses that will limit tab lube usage and not allow operators to arbitrarily increase usage.

The applicant has indicated that the total levelized annual cost to install and operate the additional equipment needed to capture and incinerate VOC emissions would be approximately \$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 \$16,527. This cost (\$16,527) 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-base 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	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

Although the use of water-base end sealant or thermal oxidation would reduce the amount of air toxics emitted from the facility, 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 impacts which are below the no-threat levels.

BACT Determination by DER:

Discussion:

The information presented by the applicant and the studies conducted by the Department indicates that the use of high solid/low VOC end sealant represents BACT for the proposed modernization of the facility. Although the use of water-base end sealant would provide the greatest VOC control, the resulting cost to control VOC (\$7,016/ton) is judged to be prohibitively expensive. The next level of control (thermal oxidation) was judged to be even more expensive.

The following table summarizes the cost-effectiveness of these two alternate technologies compared to the technology the applicant proposed as BACT. 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 automated equipment to regulate tab lube usage is BACT for the proposed lid plant modernization.

<u>Control Scenario</u>	<u>Controlled Emissions</u> (tons/year)	<u>Capital Investment (a)</u> (\$)	<u>Annualized Cost (a)</u> (\$)	<u>Cost Effectiveness</u> (\$/ton removed)
Water-base end sealant	150	4,460,347	1,339,460	7,106
Capture and incineration	95	1,835,651	1,570,034	16,527
Low solvent/ high solids and automated equipment to regulate tab lube usage	161	Baseline	Baseline	Baseline

(a) In excess of baseline scenario.

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 3.2 pounds VOC per gallon of sealant excluding water and b using automated equipment to regulate tab lube usage.

Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

C.H. Fancy

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

June 25, 1991

Date

Approved By:

Carol M. Browner

CM Carol M. Browner, Secretary
Dept. of Environmental Regulation

June 28, 1991

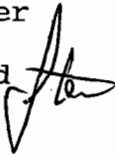
Date



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol M. Browner
FROM: Steve Smallwood 
DATE: June 25, 1991
SUBJ: Approval of Construction Permit AC 01-185835
Metal Container Corporation

Attached for your approval and signature is a permit and corresponding Best Available Control Technology (BACT) determination prepared by the Bureau of Air Regulation for the above mentioned company to construct/modify the Lid Center at their facility in Gainesville.

Comments were received from Mr. Dean E. Pusch and Mrs. Marlene Accardo of Metal Container Corporation. The project is not controversial.

I recommend your approval and signature.

CF/TH/plm

Attachments

Revised
Technical Evaluation
and
Preliminary Determination

Metal Container Corporation
Gainesville, Alachua County, Florida

Permit No. AC 01-185835
PSD-FL-153

Lid Modules 4 through 7

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

June 20, 1991

SYNOPSIS OF APPLICATION

I.1 Applicant Name and Address

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

I. 2 Reviewing and Process Schedule

Date of Receipt of Application: August 31, 1990

30 days of Completeness Review: Department's letter dated September 28, 1990.

Response to Incompleteness Letter: Company's letter dated October 5, 1990; and additional information received on November 6, 1990, December 24, 1990, and January 15, 1991.

Application Completeness Day: December 24, 1990.

II. FACILITY INFORMATION

II.1 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.

II.2 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

II.3 Facility Category

Metal Container Corporation (MCC) is classified as a major emitting facility for volatile organic compounds (VOC). Existing permitted emissions of VOC are 323 TPY. The proposed project will increase VOC emissions by 161 TPY. Total permitted volatile organic emissions for this facility after the modernization shall not be allowed to exceed 484 TPY.

III. PROJECT DESCRIPTION

Metal Container Corporation proposed to modernize its Gainesville Lid Center. This modernization will increase the facility's annual shell press production capacity to 10.047 billion lids from the existing 6.528 billion lids.

The modernization project will consist 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 currently permitted as Module 4,
- b) the shell press, three conversion presses, and three liners permitted as Module 6,
- c) the six additional 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).

Table I (page 7) lists the equipment at each module after the modification.

Table II (page 8) lists the equipment.

III.1 Background Information

- Year 1983 - Original permits to operate were received for Modules Nos. 1, 2, and 3.
- Year 1985 - Operating permit issued for Module No. 4.
- Year 1986 - Operating permits for all four modules were renewed in November. Permitted annual VOC emissions for the whole facility are 239.2.
- Year 1988 - Operating permit AO 01-144728, issued this year, included Module No. 5. Permitted annual VOC emissions for the whole facility are 235.6 tons per year.
- Year 1989 - Construction permit AC 01-159034 was issued for Module No. 6. This permit allowed an additional 87.4 tons of VOC per year, bringing the facility-wide total to 323 tons VOC per year. This construction permit was revised in March 1990 to incorporate the 13th conversion press, with no change in permitted emissions.

- Year 1990 - Application for the construction permit for the modernization project submitted on August 31, 1990.

- Year 1991 - Request to include the four end liner on new Module 5 (AC 01-159304) was approved. Permit AC 01-185835 and PSD-FL-153 will be issued. Permitted annual VOC emissions for the whole facility shall not exceed 484 tons per year.

IV. PROCESS DESCRIPTION

Major steps in this process are as follows:

Aluminum stock is stamped into lid "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.

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.) Rules 17-2 and 17-4.

Metal Container Corporation (MCC) is located in an area (Alachua County) currently designated attainment for all criteria pollutants, F.A.C. Rule 17-2.

MCC is a major emitting facility for volatile organic compounds (VOC) as defined in F.A.C. Rule 17-2.100(112). Permitted emissions of VOC for the entire facility after the proposed project, shall not exceed 484 TPY.

The proposed project, a modification to the lid manufacturing process, will be reviewed under F.A.C. Rule 17-2.500, Prevention of a Significant Deterioration (PSD), which requires the use of Best Available Control Technology (BACT) and an air quality analysis. The proposed project, increasing the facility's emissions by 161 VOC TPY, is considered under PSD regulations, a major modification to a major facility.

The proposed facility shall comply with F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards; F.A.C. Rule 17-2.630, BACT; and F.A.C. Rule 17-2.700, 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 compounds (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 the material safety data sheets (MSDS) as containing heptane, hexane, and petroleum hydrocarbons.

The permitted emissions for the entire facility shall not exceed 118 lbs VOC/hour and 484 tons VOC/year

Table III (page 9) summarizes the proposed VOC emissions at the facility by shell press production (module).

VI.2. Air Quality Analysis

The proposed project is subject to an air quality analysis for ozone since the projected increase in VOC emissions is greater than 100 TPY. However, there are no currently available air dispersion models for use in modeling VOC point sources in relation to ozone concentrations. For this reason and also since the proposed project is located in an ozone attainment area, it will be regulated through the BACT requirements and PSD review for it will be based primarily on the BACT determination.

The proposed project has also been evaluated in accordance with procedures contained in the Department's Air Toxics Permitting Strategy (Draft). The maximum hourly emissions of potential air toxics were modeled to determine the predicted off-property maximum ambient concentrations for comparison to the no-threat levels contained in the air toxics permitting strategy. The pollutants evaluated were n-hexane, n-heptane, cyclohexane, cyclohexylmethane, toluene, benzene and stoddard solvent. Since n-hexane was the principal VOC air toxic of interest, modeling was performed directly for n-hexane emissions. The maximum predicted concentrations for the other pollutants were based on the ratio of their projected emissions to those of n-hexane. Total facility-wide emissions of n-hexane are projected to be 21.7 lbs/hr and 89.2 tons per year. The emissions are released through 13 vents, stacks and exhausts located on the roof. The total emissions of each pollutant are distributed among the 13 emission points in proportion to the exhaust flowrate. Because the proposed project will result in an increase of n-hexane emissions, the applicant will improve the dispersion characteristics by raising stack heights and where possible by changing exhaust orientations from horizontal to vertical.

The EPA and Department-approved Industrial Source Complex Short-Term (ISCST) model was run with one year of meteorological data (Tallahassee surface and Waycross, GA upper air, 1986). Direction specific downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height. Since only one year of data was used, the highest predicted concentrations were compared with the no-threat levels. A receptor grid with 50-meter spacing between receptor points was used. The modeling results are given in the table below and show that maximum predicted off-property concentrations for each pollutant are below the applicable no-threat levels.

Pollutant	Maximum Predicted Concentration (ug/m3)			No-Threat Levels (ug/m3)		
	8-hr	24-hr	Annual	8-hr	24-hr	Annual
n-hexane	796	355	--	1,800	430	--
n-heptane	707	315	--	32,000	15,238	--
cyclohexane	143	64	--	1,000	238	--
cyclohexylmethane	59	27	--	32,000	7,619	--
toluene	--	--	11*	--	--	2,000
benzene	--	--	0.05*	--	--	0.123
stoddard solvent	53	24	--	5,250	1,250	--

*Annual concentrations were not modeled. Annual concentrations are conservatively assumed to equal the modeled 24 hour impact.

V. CONCLUSION

Based on the information provided by Metal Container Corporation, the Department has reasonable assurance that the construction of the proposed source, 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 or PSD increment, or violate any other technical provision of Chapter 17-2 of the Florida Administrative Code.

Table I
 METAL CONTAINER CORPORATION - GAINESVILLE LID CENTER
 MODERNIZATION PROJECT

Equipment Identification by Module

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

- (a) As designated in the August 15, 1990 permit application
 (b) As identified in Table II.A-1 of the August 15, 1990 permit application
 (c) Currently identified/permitted as Module 4 by Florida DER
 (d) Currently identified/permitted as Module 6 by Florida DER

Table II
 GAINESVILLE LID CENTER MODERNIZATION -
 EQUIPMENT LIST

Identification	Manufacturer
Shell Press	
SP-1	Minster/Redicon End Level II
SP-2	"
SP-3	"
SP-4	Minster/Redicon DAS-100-72
Conversion Press	
CP-1	Minster/Stolle
CP-2	"
CP-3	"
CP-4	"
CP-5	"
CP-6	Bruderer/Stolle
CP-7	"
CP-8	Minster/Stolle
CP-9	"
CP-10	"
CP-11	"
CP-12	"
End Liner	
EL-1	Preferred
EL-2	"
EL-3	"
EL-4	"
EL-5	"
EL-6	"
EL-7	"
EL-8	"
EL-9	"
EL-10	"
EL-11	"
EL-12	"
EL-13	"
EL-14	"

Table III
PROPOSED SUMMARY OF EMISSIONS

VOC Emissions (by shell press production)

Source	lbs/hr	tons/yr
Module 7		
end sealant	18.7	76.8
tab lube	9.1	37.5
Texsolve C	4.7	19.3
Amsco 1241	<u>0.4</u>	<u>1.6</u>
Total	<u>32.9</u>	<u>135.2</u>
Module 6		
end sealant	18.7	76.8
tab lube	6.1	25.0
Texsolve C	4.7	19.3
Amsco 1241	<u>0.3</u>	<u>1.1</u>
Total	<u>29.8</u>	<u>122.1</u>
Module 5		
end sealant	18.7	76.8
tab lube	9.1	37.5
Texsolve C	4.7	19.3
Amsco 1241	<u>0.4</u>	<u>1.6</u>
Total	<u>32.9</u>	<u>135.2</u>
Module 4		
end sealant	9.4	38.4
tab lube	4.1	16.7
Texsolve C	2.3	9.6
Amsco 1241	<u>0.2</u>	<u>0.7</u>
Total	<u>15.9</u>	<u>65.4</u>
Off-line Conversion Press		
end sealant	0.0	0.0
tab lube	6.1	25.0
Texsolve C	0.0	0.0
Amsco 1241	<u>0.3</u>	<u>1.1</u>
Total	<u>6.4</u>	<u>26.1</u>
Entire Facility		
end sealant	65.5	268.7
tab lube	34.5	141.7
Texsolve C	16.4	67.5
Amsco 1241	<u>1.5</u>	<u>6.0</u>
Total	<u>117.9</u>	<u>483.9</u>



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.

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
Module 6		
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
Module 5		
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
Module 4		
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
Off-line Conversion Presses		
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
Entire Facility		
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

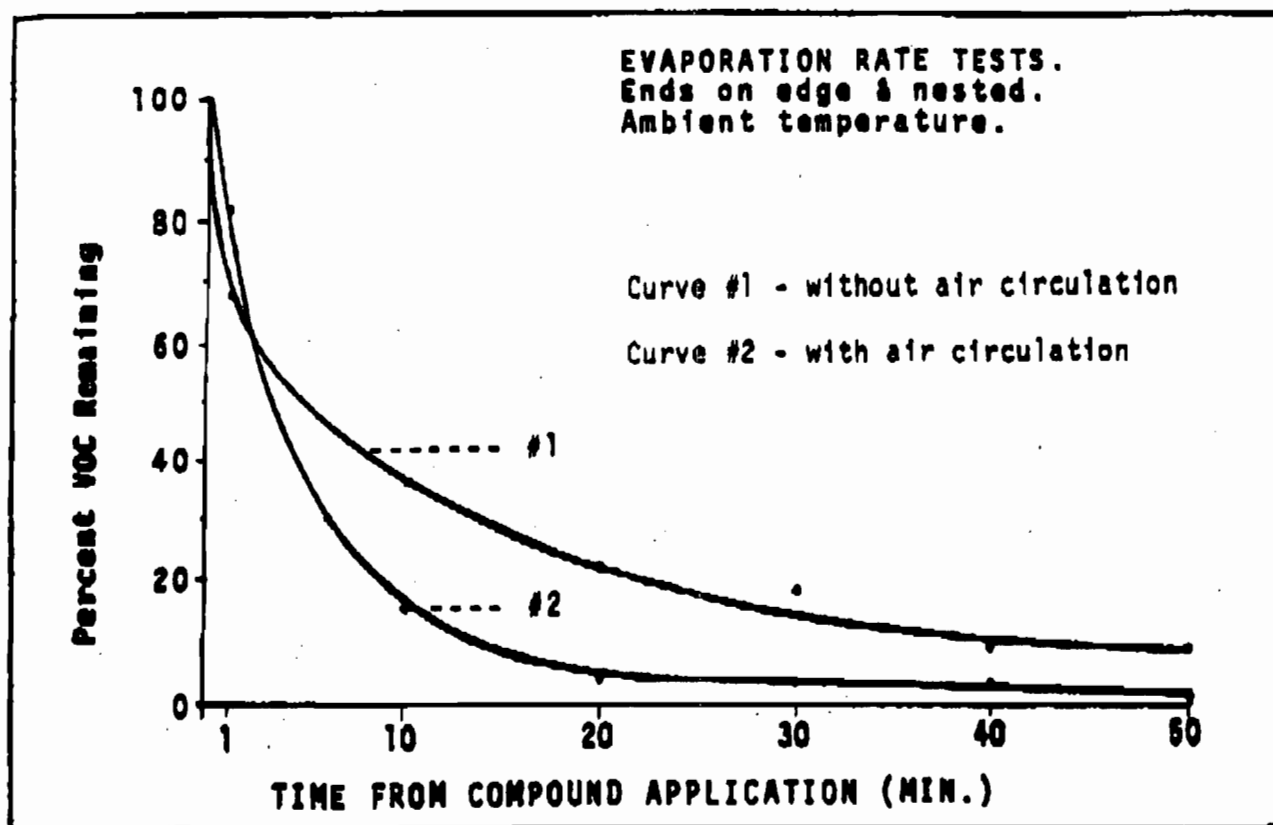
production	20400 lids/min;	10.047 billion lids/yr		
	<u>density</u> [lb/gal]	<u>usage rate</u> [gal/1000 lids]	<u>chemical</u>	<u>weight</u> <u>percent</u>
end sealant	7.82	0.0169	n-hexane	13
			n-heptane	3
			cyclohexane	2
			cyclohexylmethane	1
			benzene	0.001
Texsolve C	5.84	0.0023	n-hexane	4
		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

GRAPH I
(METHOD #1)

PERCENT NON-VOLATILES RECOVERY

OKLAHOMA TAB-LUBE (NO. 596)

CONDITIONS: AL. STRIPS @ 4" x 2" (16 IN.² SURFACE AREA)

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

○ A: 13.9 MG/IN.² ■ C: 14.3 MG/IN.²
● B: 22.1 MG/IN.² ▲ D: 14.8 MG/IN.²

% NON-VOLATILES RECOVERY

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

30

60

90

120

150

180

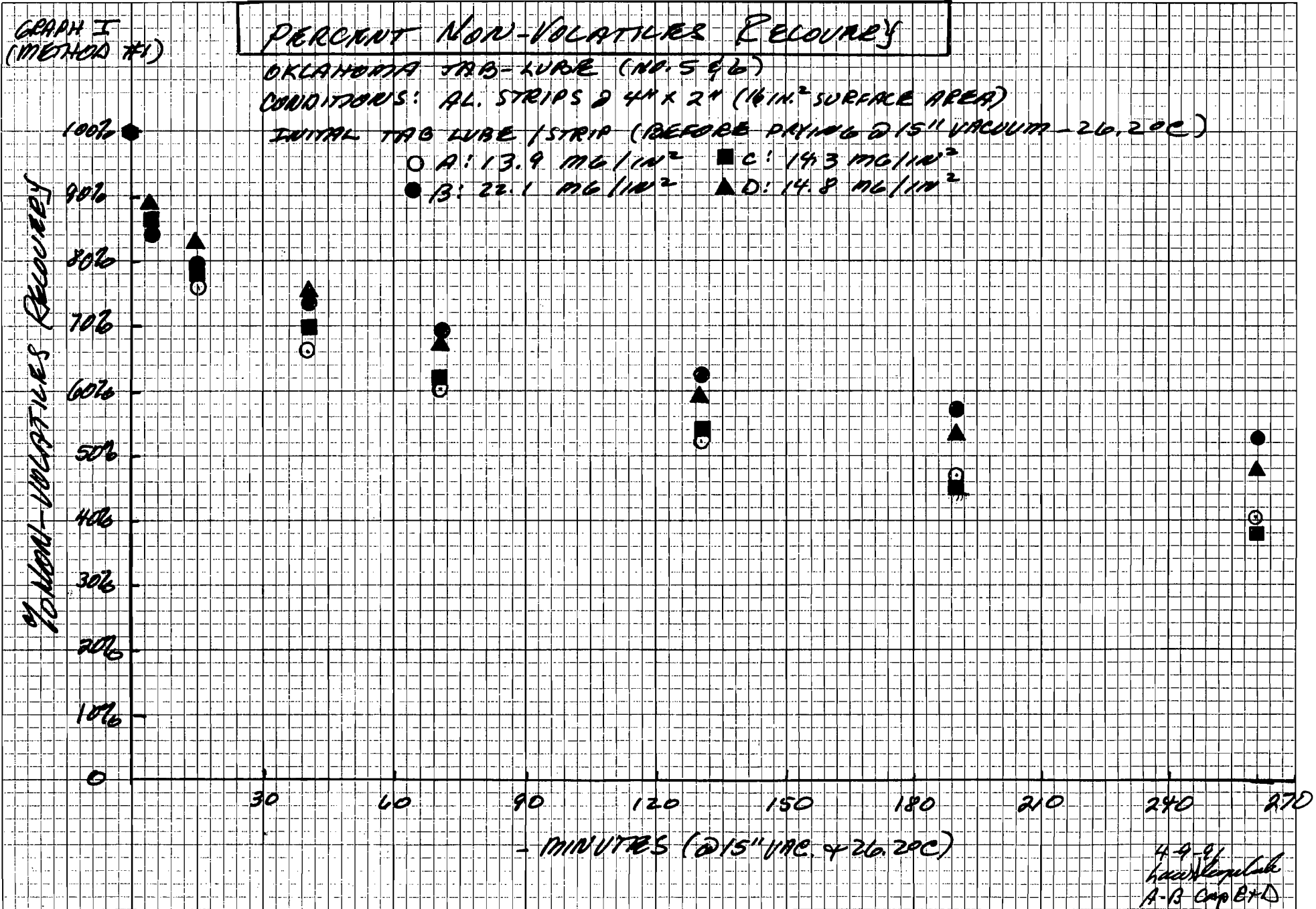
210

240

270

- MINUTES (@ 15" VAC. & 26.2°C)

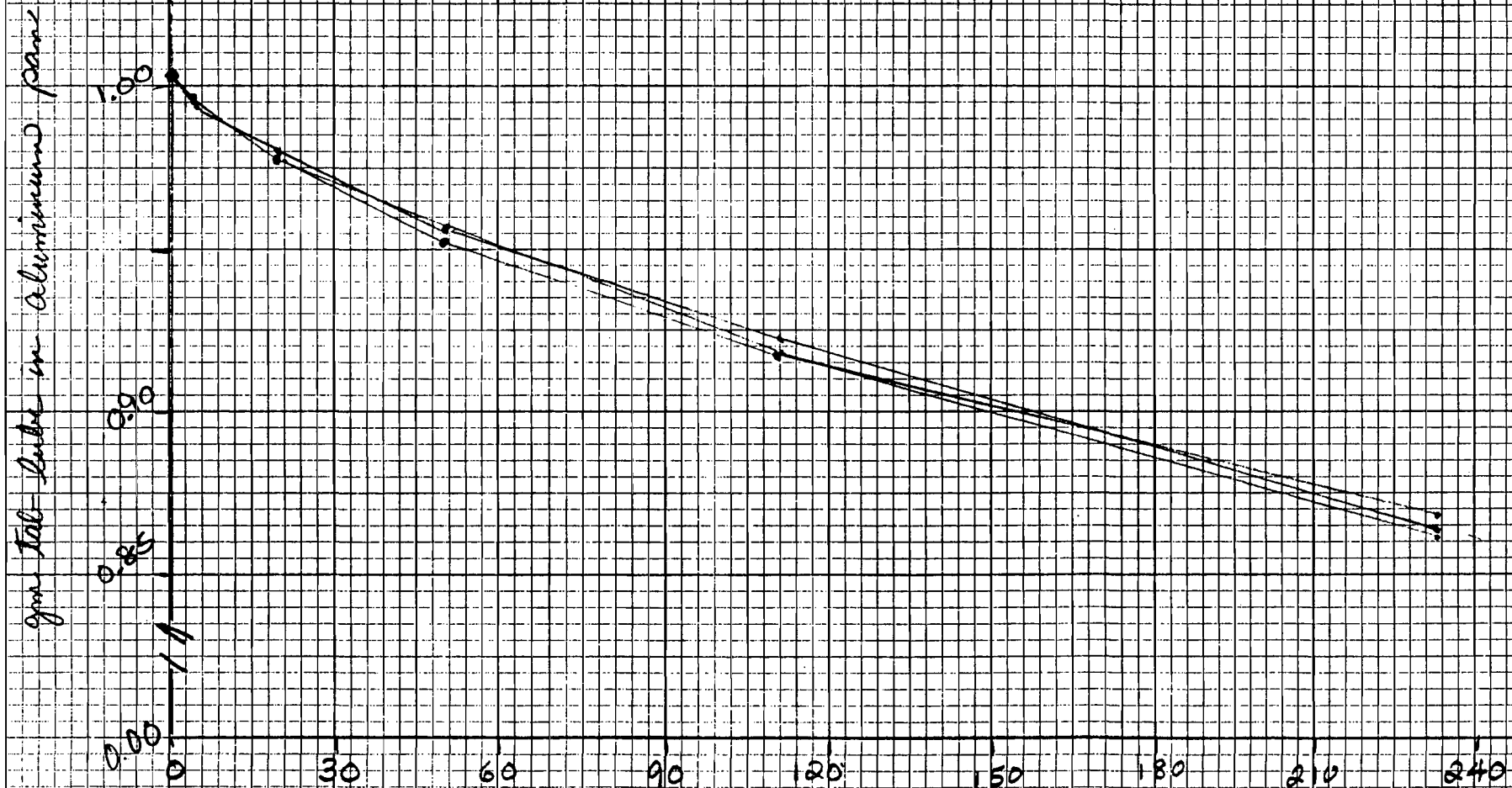
4-9-91
Hazen/Slopelak
A-B Cap B+D
1716-170,171



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 in²)



minutes under -15 in Hg vacuum

NEP 1434A/64-66

[Signature] 4/9/81

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	
CAPITAL COSTS:						
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
SUBTOTAL CAPITAL COST		1123.8	933.4			2057.2
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%)					
TOTAL CAPITAL COST		1606.6	1073.4			2680.0
EXPENSE COSTS:						
TOTAL EXPENSE COST						
TOTAL PROJECT COST		1606.6	1073.4			2680.0

BEST AVAILABLE COPY

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	52,839	77,763
DIRECT PROJECT COST:		6,731	183,735	87,154	852,955	933,489	2,057,333
895 Engineering							246,880
910 Construction Support							66,852
940 Equipment Contingency							140,023
940 Construction Contingency							168,577
940 Engineering Contingency							0
GRAND TOTAL:							2,679,665

FROM: ABC CORP. PKG. SHIPPING TO: ENVIRONMENTAL ENGR APR 24, 1991 4:05PM #566 P.03

ANHEUSER-BUSCH COMPANIES, INC.
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 \$
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" & 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 & Equipt</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 & Equipt 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	863,871	933,489	2,068,019

FROM: ABC CORP. PKG. SHIPPING TO: ENVIRONMENTAL ENGR APR 24, 1991 4:05PM #566 P.04

ANHEUSER-BUSCH COMPANIES, INC.
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	266,500
Yard Utilities TOTAL			1.00					0	0	0	266,500	0	266,500
<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	5,863
Railroads TOTAL			100.00					0	0	0	5,863	0	5,863
<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	2,324
320	216-140-000	Concrete - Equipt Foundations	150.00	CY	135.00	11.500	0.00	1,725	47,810	23,745	0	0	71,555
Concrete TOTAL			586.00					1,725	47,810	23,745	2,324	0	73,879
<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	82,508
320	218-122-000	Lexan Enclosures	5800.00	SF	7.50	0.700	2.50	4,060	112,527	51,008	22,424	0	185,959
Misc. Metals TOTAL			31600.00					4,060	112,527	51,008	104,932	0	268,467
<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	7,995
Siding TOTAL			500.00					0	0	0	7,995	0	7,995
<u>Doors & 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	36,887
Doors & Frames TOTAL			4.00					320	7,307	0	8,980	20,600	36,887
<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	15,990
Fire Protection TOTAL			1.00					0	0	0	15,990	0	15,990
<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	793,758
320	318-340-003	Freight	1.00	LS	0.00	0.000	0.00	0	0	0	0	36,050	36,050
Process Equipment TOTAL			2.00					600	15,395	5,863	0	808,550	829,808
<u>Process Misc. Metals</u>													

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

I N T E R O F F I C E M E M O R A N D U M

Date: 10-Apr-1991 11:28am GMT
From: Iris Littleton
LITTLETON_I
Dept: Office General Counsel
Tel No: 904/488-9730

TO: Ernest Frey

(FREY, ERNEST)

CC: Pat Manning

(MANNING_P)

CC: Andrew Kutyna

(KUTYNA, ANDREW)

Subject: New OGC Case Assignment

TO: Ernest Frey

FROM: Iris - OGC - Tallahassee

Received 4/08/91 request for an Administrative Hearing from
Metal Container Corp. concerning permit AC01-185835.

cc: B. Andrews
J. Heron
C. Holladay

BEST AVAILABLE COPY



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

RECEIVED
APR 4 1991
DER-BAQM

FEDERAL EXPRESS MAIL - 9401964714

April 3, 1991

Mr. Clair Fancy
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Metal Container Corporation
Gainesville, FL
AC 01-185835
PSD-FL-153

Dear Mr. Fancy:

Enclosed herewith is a copy of the Gainesville Sun publication "Notice of Intent" together with their original certification of publication for the referenced permit.

Please contact me at 904-378-8800 if you have any questions concerning this matter.

Sincerely,

Joseph J. Waters
Joseph J. Waters
Plant Manager

am

enclosures (2)

cc: M. Accardo
D. Pusch
D. Lafferty
J. Douglas

Teresa Heron }
Clemie Holladay } 4-5-91 00:00
Andy Kutyna, NED }

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE

AIRBILL
PACKAGE
TRACKING NUMBER

9401964714

9401964714

RECIPIENT'S COPY

Date 4/3/91		To (Recipient's Name) Please Print Mr. Clair Fancy		Recipient's Phone Number (Very Important)
From (Your Name) Please Print Joseph J. Waters		Your Phone Number (Very Important) 904-378-8800	Company St. of FL DER, Air Quality Management	
Company METAL CONTAINER CORP		Department/Floor No.	Department/Floor No.	
Street Address 5909 NW 18TH DRIVE		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes) Twin Towers Office Bldg. 2600 Blair Stone Rd.		
City GAINESVILLE	State FL	ZIP Required 32606	City Tallahassee	State FL
		ZIP Required 32399		

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

IF HOLD FOR PICK-UP: Print FEDEX Address Here

Street Address

City State ZIP Required

PAYMENT Bill Sender Bill Recipient's FedEx Acct. No. Bill 3rd Party FedEx Acct. No. Bill Credit Card

Cash Check

SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)			PACKAGES	WEIGHT in Pounds Oz.	YOUR DECLARED VALUE	Emp. No.	Date	Federal Express Use	
Priority Overnight Service (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 16 <input type="checkbox"/> FEDEX LETTER* 12 <input type="checkbox"/> FEDEX PAK* 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day Service (formerly Standard Air) (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY TWO-DAY SVC.	Standard Overnight Service (Delivery by next business afternoon) 51 <input type="checkbox"/> 56 <input checked="" type="checkbox"/> FEDEX LETTER* 52 <input type="checkbox"/> FEDEX PAK* 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Heavyweight Service (for Extra Large or any package over 150 lbs.) 70 <input type="checkbox"/> HEAVYWEIGHT** 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT**	1 <input type="checkbox"/> HOLD FOR PICK-UP (See Box H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE _____ lbs. 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> DESCRIPTION: _____ 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)								<input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: _____ Date/Time Received FedEx Employee Number	Base Charges Declared Value Charge Other 1 Other 2 Total Charges
DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> _____ lbs.							Received At <input type="checkbox"/> Regular Stop <input type="checkbox"/> Drop Box <input type="checkbox"/> On-Call Stop <input type="checkbox"/> B.S.C. <input type="checkbox"/> Station		REVISION DATE 8/90 PART # 119501, FXEM 10/90 FORMAT #041 041 © 1990 F.E.C. PRINTED IN U.S.A.		

THE GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA

STATE OF FLORIDA
COUNTY OF ALACHUA

Before the undersigned authority personally appeared Bette K. Congi

who on oath says that he/she is Classified Advertising 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,

..... March 30, 19 91

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

1 day of Apr. A.D., 19 91

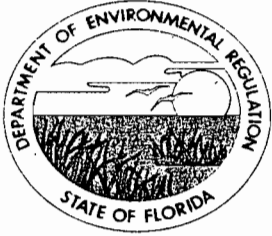
Martha A. Peterson
(Seal) Notary Public



"OFFICIAL NOTARY SEAL"
MARTHA A. PETERSON
MY COMM. EXP. 4/8/94

Bette Congi

STATE OF FLORIDA
Department of Environmental Regulation
Notice of Intent to Issue
The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Metal Container Corporation, 5905 N.W. 181st Drive, Gainesville, Alachua County, Florida, 32606, to construct/modify the Gainesville Lid Center facility. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.
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. 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 fourteen (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, Florida Statutes.
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 20-5.207, F.A.C.
The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays.
Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; Department of Environmental Regulation, Northeast District, 7825 Bay Meadows Way, Suite 2008 Jacksonville, Florida 32256-7577.
Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing may be requested by any person. Such requests must be submitted within 30 days of this notice.
(738) 3:30



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 21, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

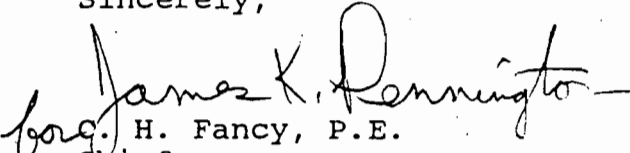
Mr. Joseph Waters, Plant Manager
Metal Container Corporation
5909 N.W. 18th Drive
Gainesville, Florida 32606

Dear Mr. Waters:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct/modify the Gainesville Lid Center facility.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,


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

CHF/TH/plm

Attachments

c: Andrew Kutyna, NE Dist.
Shannon K. Baruch, NE Dist.
John H. Schamburgh, P.E.
J. Harper, EPA
C. Shaver, NPS
D. Puseh, A-BC

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

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

DER File No. AC 01-185835
PSD-FL-153

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Metal Container Corporation, applied on August 31, 1990, to the Department of Environmental Regulation for a permit to construct/modify the Gainesville Lid Center facility.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, 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, at the address specified 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, Florida Statutes. 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 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, Florida Statutes.

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(s) 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 in 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 REGULATION

for James K. Pennington
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

Andrew Kutyna, NE Dist.
Shannon K. Baruch, NE Dist.
John H. Schamburgh, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 3-21-91.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52(9), Florida Statute, with the designated Department Clerk, receipt of which is hereby acknowledged.

Joni Dabe
Clerk

3-21-91
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Metal Container Corporation, 5909 N.W. 18th Drive, Gainesville, Alachua County, Florida 32606, to construct/modify the Gainesville Lid Center facility. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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. 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 fourteen (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, Florida Statutes.

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, F.A.C.

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

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing may be requested by any person. Such requests must be submitted within 30 days of this notice.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the RETURN TO Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1 Show to whom delivered, date and addressee's address. (Extra charge) 2 Restricted Delivery (Extra charge)

3 Article Addressed to:
Mr. Joseph Waters
Plant Manager
Metal Container Corp.
5909 N.W. 18th Drive
Gainesville, FL 32606

4 Article Number:
P 407 802 153

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED

5 Signature - Addressee
X

6 Signature - Agent
X *John Knight*

7 Date of Delivery
5-25-91

8 Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

P 407 802 153

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

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

PS Form 3800, June 1985

Sent to	Mr. Joseph Waters, Metal
Street and No.	Container Corp. 5909 N.W. 18th Dr.
P.O., State and ZIP Code	Gainesville, FL 32606
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	Mailed: 3-21-91 Permit: AC 01-185835 PSD-FL-153

Technical Evaluation
and
Preliminary Determination

Metal Container Corporation
Gainesville, Alachua County, Florida

Permit No. AC 01-185835
PSD-FL-153

Lid Modules 1 through 4

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

March 21, 1991

SYNOPSIS OF APPLICATION

I.1 Applicant Name and Address

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

I. 2 Reviewing and Process Schedule

Date of Receipt of Application: August 31, 1990

30 days of Completeness Review: Department's letter dated September 28, 1990.

Response to Incompleteness Letter: Company's letter dated October 5, 1990; and additional information received on November 6, 1990, December 24, 1990, and January 15, 1991.

Application Completeness Day: December 24, 1990.

II. FACILITY INFORMATION

II.1 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.

II.2 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

II.3 Facility Category

Metal Container Corporation (MCC) is classified as a major emitting facility for volatile organic compounds (VOC). Existing permitted emissions of VOC are 323 TPY. The proposed project will increase VOC emissions by 61 TPY. Total permitted volatile organic emissions for this facility after the modernization shall not be allowed to exceed 384 TPY.

III. PROJECT DESCRIPTION

Metal Container Corporation proposed to modernize its Gainesville Lid Center. This modernization will increase the facility's annual shell press production capacity to 11.445 billion lids from the existing 6.528 billion lids.

The modernization project will consist 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 currently permitted as Module 4,
- b) the shell press, three conversion presses, and three liners permitted as Module 6,
- c) the six additional 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).

Table I (page 7) lists the equipment at each module after the modification.

Table II (page 8) lists the equipment.

III.1 Background Information

- Year 1983 - Original permits to operate were received for Modules Nos. 1, 2, and 3.
- Year 1985 - Operating permit issued for Module No. 4.
- Year 1986 - Operating permits for all four modules were renewed in November. Permitted annual VOC emissions for the whole facility are 239.2.
- Year 1988 - Operating permit AO 01-144728, issued this year, included Module No. 5. Permitted annual VOC emissions for the whole facility are 235.6 tons per year.
- Year 1989 - Construction permit AC 01-159034 was issued for Module No. 6. This permit allowed an additional 87.4 tons of VOC per year, bringing the facility-wide total to 323 tons VOC per year. This construction permit was revised in March 1990 to incorporate the 13th conversion press, with no change in permitted emissions.

• Year 1990 - Application for the construction permit for the modernization project submitted on August 31, 1990.

• Year 1991 - Permit AC 01-185835 and PSD-FL-153 will be issued. Permitted annual VOC emissions for the whole facility shall not exceed 384 tons per year.

IV. PROCESS DESCRIPTION

Major steps in this process are as follows:

Aluminum stock is stamped into lid "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.

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.) Rules 17-2 and 17-4.

Metal Container Corporation (MCC) is located in an area (Alachua County) currently designated attainment for all criteria pollutants, F.A.C. Rule 17-2.

MCC is a major emitting facility for volatile organic compounds (VOC) as defined in F.A.C. Rule 17-2.100(112). Permitted emissions of VOC for the entire facility after the proposed project, shall not exceed 384 TPY.

The proposed project, a modification to the lid manufacturing process, will be reviewed under F.A.C. Rule 17-2.500, Prevention of a Significant Deterioration (PSD), which requires the use of Best Available Control Technology (BACT) and an air quality analysis. The proposed project, increasing the facility's emissions by 241 VOC TPY, is considered under PSD regulations, a major modification to a major facility.

The proposed facility shall comply with F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards; F.A.C. Rule 17-2.630, BACT; and F.A.C. Rule 17-2.700, 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 compounds (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 the material safety data sheets (MSDS) as containing heptane, hexane, and petroleum hydrocarbons.

The permitted emissions for the entire facility shall not exceed 87.6 lbs VOC/hour and 384 tons VOC/year

Table III (page 9) summarizes the proposed VOC emissions at the facility by shell press production (module).

VI.2. Air Quality Analysis

The proposed project is subject to an air quality analysis for ozone since the projected increase in VOC emissions is greater than 100 TPY. However, there are no currently available air dispersion models for use in modeling VOC point sources in relation to ozone concentrations. For this reason and also since the proposed project is located in an ozone attainment area, it will be regulated through the BACT requirements and PSD review for it will be based primarily on the BACT determination.

The proposed project has also been evaluated in accordance with procedures contained in the Department's Air Toxics Permitting Strategy (Draft). The maximum hourly emissions of potential air toxics were modeled to determine the predicted off-property maximum ambient concentrations for comparison to the no-threat levels contained in the air toxics permitting strategy. The pollutants evaluated were n-hexane, n-heptane, cyclohexane, cyclohexylmethane, toluene, benzene and stoddard solvent. Since n-hexane was the principal VOC air toxic of interest, modeling was performed directly for n-hexane emissions. The maximum predicted concentrations for the other pollutants were based on the ratio of their projected emissions to those of n-hexane. Total facility-wide emissions of n-hexane are projected to be 26.8 lbs/hr and 104.2 tons per year. The emissions are released through 13 vents, stacks and exhausts located on the roof. The total emissions of each pollutant are distributed among the 13 emission points in proportion to the exhaust flowrate. Because the proposed project will result in an increase of n-hexane emissions, the applicant will improve the dispersion characteristics by raising stack heights and where possible by changing exhaust orientations from horizontal to vertical.

The EPA and Department-approved Industrial Source Complex Short-Term (ISCST) model was run with one year of meteorological data (Tallahassee surface and Waycross, GA upper air, 1986). Direction specific downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height. Since only one year of data was used, the highest predicted concentrations were compared with the no-threat levels. A receptor grid with 50-meter spacing between receptor points was used. The modeling results are given in the table below and show that maximum predicted off-property concentrations for each pollutant are below the applicable no-threat levels.

Pollutant	Maximum Predicted Concentration (ug/m3)			No-Threat Levels (ug/m3)		
	8-hr	24-hr	Annual	8-hr	24-hr	Annual
n-hexane	796	355	--	1,800	430	--
n-heptane	707	315	--	32,000	15,238	--
cyclohexane	143	64	--	1,000	238	--
cyclohexylmethane	59	27	--	32,000	7,619	--
toluene	--	--	11*	--	--	2,000
benzene	--	--	0.05*	--	--	0.123
stoddard solvent	53	24	--	5,250	1,250	--

*Annual concentrations were not modeled. Annual concentrations are conservatively assumed to equal the modeled 24 hour impact.

V. CONCLUSION

Based on the information provided by Metal Container Corporation, the Department has reasonable assurance that the construction of the proposed source, 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 or PSD increment, or violate any other technical provision of Chapter 17-2 of the Florida Administrative Code.

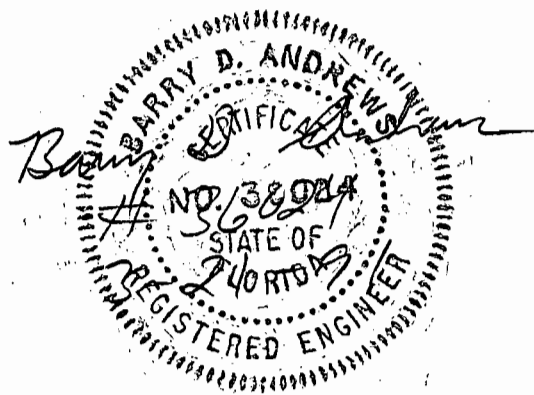


Table I
 METAL CONTAINER CORPORATION - GAINESVILLE LID CENTER
 MODERNIZATION PROJECT

Equipment Identification by Module

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

- (a) As designated in the August 15, 1990 permit application
 (b) As identified in Table II.A-1 of the August 15, 1990 permit application
 (c) Currently identified/permitted as Module 4 by Florida DER
 (d) Currently identified/permitted as Module 6 by Florida DER

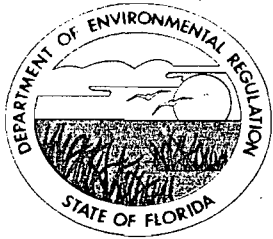
Table II
 GAINESVILLE LID CENTER MODERNIZATION -
 EQUIPMENT LIST

Identification	Manufacturer
Shell Press	
SP-1	Minster/Redicon End Level II
SP-2	"
SP-3	"
SP-4	Minster/Redicon DAS-100-72
Conversion Press	
CP-1	Minster/Stolle
CP-2	"
CP-3	"
CP-4	"
CP-5	"
CP-6	Bruderer/Stolle
CP-7	"
CP-8	Minster/Stolle
CP-9	"
CP-10	"
CP-11	"
CP-12	"
End Liner	
EL-1	Preferred
EL-2	"
EL-3	"
EL-4	"
EL-5	"
EL-6	"
EL-7	"
EL-8	"
EL-9	"
EL-10	"
EL-11	"
EL-12	"
EL-13	"
EL-14	"

Table III
PROPOSED SUMMARY OF EMISSIONS

VOC Emissions (by shell press production)

Source	lbs/hr	tons/yr
Machine 1 (Module 7)		
end sealant	24.5	95.4
tab lube	13.1	50.9
Amsco 1487	5.7	22.2
Amsco 1241	<u>0.5</u>	<u>2.1</u>
Total	43.9	170.6
Machine 2 (Module 6)		
end sealant	24.5	95.4
tab lube	13.1	50.9
Amsco 1487	5.7	22.2
Amsco 1241	<u>0.5</u>	<u>2.1</u>
Total	43.9	170.6
Machine 3 (Module 5)		
end sealant	21.8	84.8
tab lube	11.6	45.3
Amsco 1487	5.1	19.8
Amsco 1241	<u>0.5</u>	<u>1.8</u>
Total	39.0	151.7
Machine 4 (Module 4)		
end sealant	10.2	39.6
tab lube	5.4	21.1
Amsco 1487	2.4	9.2
Amsco 1241	<u>0.2</u>	<u>0.9</u>
Total	18.2	70.8
Entire Facility		
end sealant	81.1	315.2
tab lube	43.3	168.3
Amsco 1487	18.9	73.4
Amsco 1241	<u>1.8</u>	<u>6.9</u>
Total	145.0	563.8



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Metal Container Corp.
5909 NW 18th Drive
Gainesville, Florida 32606

Permit Number: AC 01-185835
Expiration Date: January 30, 1993
County: Alachua
Latitude/Longitude: 29°42'5"
82°20'53"

Project: Lid Modules 1 thru 4

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction/modification of the Lid Center (Modules 1 through 4) 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, DER Form 17-1.122(16), received on August 31, 1990.
2. Department's letter dated September 28, 1990.
3. Metal Container Corporation's letters dated October 5, November 6, and December 24, 1990; and January 15, 1991.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

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, Florida Statutes. 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), Florida Statutes, 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 acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, 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 Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

GENERAL CONDITIONS:

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.

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.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

GENERAL CONDITIONS:

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 Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, 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.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

GENERAL CONDITIONS:

- 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;
 - 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:

Emission Limits

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

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

Clean up Solvent:	<u>6.32 lbs VOC</u>	and	<u>4.35 lbs VOC</u>
	gal mineral spirits		gal hexane

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

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

Pollutant	No-Threat Levels (ug/m3)		
	8-hr	24-hr	Annual
n-hexane	1,800	430	--
n-heptane	32,000	15,238	--
cyclohexane	1,000	238	--
cyclohexylmethane	32,000	7,619	--
toluene	--	--	2,000
benzene	--	--	0.123
stoddard solvent	5,250	1,250	--

3. The total permitted VOC emissions from coatings and organic solvents for the entire facility shall not exceed 87.6 lbs per hour and 384 tons per year.

Operating Requirements

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

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

- A maximum annual production of 11.445 billion lids.
- A maximum usage rate (all coatings and solvents) of 0.0248 gallons/1000 lids.
- A maximum input rate of 9510 lbs/hr aluminum shell and tab stock.

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.

7. The applicant shall install a thermal oxidizer capable of meeting the following specifications:

- A minimum of 65% capture efficiency.
- A minimum of 95% destruction efficiency.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

Compliance Determination

8. Compliance with the VOC emission limits (as specified in the BACT determination) for this facility shall be determined by EPA Method 25 (destruction efficiency), Method 25A (capture efficiency), and EPA Method 24 or 24A (VOC content). The aforementioned Methods are contained in 40 CFR 60, Appendix A (July 1, 1989) and adopted by reference in Section 17-2.700, F.A.C. Compliance with the VOC standards can also be determined by EPA approved protocol(s) as described in the EPA Memorandum dated April 16, 1990, entitled "Guidelines for Developing a State Protocol for the Measurement of Capture Efficiency" (copy attached). The permittee shall notify the Department days in advance of the Method and/or protocol selected.

9. The permittee or the coating manufacturer shall determine the VOC content of each coating using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A, and adopted by reference in F.A.C. Rule 17-2.700. 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 coatings or the same 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 (not included in the application) requires prior written notification. Notification shall be provided to the Northeast District office and shall include EPA Method 24 or Appendix B test results. Testing procedures shall be consistent with the requirements of F.A.C. Rule 17-2.700.

10. Compliance with the acceptable ambient 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. Ambient monitoring may be used in addition to modeling. These calculations shall be available upon request by the Department.

11. The permittee shall maintain a record of the clean up solvents used and the waste solvents hauled off site on a quarterly basis. A composite sample of the VOC content in the waste solvents shall be established once per quarter using Method 24 or 24A.

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

12. The permittee shall maintain accurate recordkeeping of all paints and solvents in operation at the facility for at least a two year period.

13. The permittee shall notify the Northeast District office in writing at least 30 days prior to any testing. The period prior to testing shall not exceed 180 days after construction is completed. Compliance test results shall be submitted to the Northeast office no later than 45 days after the final test run.

14. 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 17-2, 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

15. This facility shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapters 17-2 and 17-4, Florida Administrative Code.

16. 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 (F.A.C. Rule 17-2.210(1)).

17. According to F.A.C. Rule 17-2.620(1)(a), 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 crew efficiency to minimize pollutant emissions. 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 use;

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

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

18. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.620(2).

19. Pursuant to F.A.C. Rule 17-2.210(2), 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 and shall be sent to the Northeast District office to assess emissions and maintain VOC emissions inventory. The quantity of lids processed per module shall be included in the report. This report shall also include but not be limited to VOC limits (lbs/hr, lbs/day, lbs/month, tons/yr), measured destruction & capture efficiency, manufacturer's certification, coating usage records, hours of operation, and test results.

20. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAR prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

21. An application for an operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant 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 (F.A.C. 17-4.220).

Issued this _____ day
of _____, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner, Secretary

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

The applicant intends to modernize their aluminum lid manufacturing facility in Gainesville, Florida. The modernization will result in an increase in the facility's annual production, from an existing 6.528 billion lids to 11.445 billion lids. This increase in production will result in an annual potential increase of 241 tons of volatile organic compound emissions above the currently permitted 323 tons. Potential VOC emissions will be minimized through the use of low-solvent, high solids compounds.

In accordance with Rule 17-2.500(2)(f)(3) of the Florida Administrative Code (F.A.C.) a BACT review for volatile organic compounds 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 contents for the end sealant and other compounds proposed for use at the facility is given below:

Compound	VOC Content (weight fraction)
End Sealant	0.4048
Tab Lube	0.945
Solvents	1.0

Date Receipt of a BACT Application:

December 24, 1990

Review Group Members:

This determination was based upon comments received from the applicant and the Permitting and Standards Section.

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 17-2, 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 modernization project (VOC content equals 3.2 pounds/gallon).

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 compound,
2. collection and destruction of VOC emissions through the use of thermal incineration.

Both of these technologies were assessed assuming application to the new modules to be added as part of the modernization. The two existing modules which remain will continue to operate using the existing high solid/low-solvent compound as they are currently permitted.

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-base 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. In addition, the applicant's experience with water-base end sealant has shown significantly lower production efficiency than with low solvent/high solids sealant due to equipment downtime from tooling build-up and high spoilage rates.

In order to meet committed production quotas from this facility, additional equipment would be required if water-base sealant was used. A liner, dryer, balancer, conversion press, counter/bagger, and conveying equipment would be the minimum additional equipment required, as well as a new additional water-base compound bulk storage and delivery system.

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 \$1.34 million. When this cost is taken into consideration with the annual VOC reductions that would be realized by using water-base end sealant compound (191 tons per year) the cost per ton of controlling VOC's would be \$7,016.

This cost (\$7,016/ton) is not representative of costs that have been previously justified as BACT and is judged to be cost prohibitive 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 and ducting the VOC's which are "flashed-off" during the manufacturing process to an incinerator.

The applicant has stated that the lid manufacturing process does not easily 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. The largest reductions could be achieved by ducting the

scrap cyclones (VOC from tab lube) and the end liners and balancers (VOC from end sealant) to the incineration unit. The applicnat has estimated that 65% of the VOC from these materials can be captured and ducted to a thermal oxidizer with a 90% destruction efficiency.

Given the 65% capture and 90% destruction of VOC's from the tab lube and end sealing processes, it is estimated that VOC reduction would be approximately 171 tons per year. When this VOC reduction is taken into consideration with the total levelized annual cost (operating plus amortized capital cost) to install and operate a thermal oxidizer of \$774,700, the cost to control VOC emissions would be \$4,530 per ton. This cost is more representative of what has been judged to be BACT for VOC control.

Environmental Impact Analysis:

In addition to the bulk VOC control that could be achieved by using either water-base 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>Emissions(tons/year)</u>
n-hexane	101.24
n-heptane	23.44
cyclohexane	16.3
cyclohexylmethane	7.8
	<hr/>
Total-	148.7

The use of water-base end sealant would result in 100% control of these toxic compounds since the sealant would not contain any VOC. If thermal oxidation was employed, these toxic compounds would be reduced by 58.4 percent.

A review of the maximum impacts expected from these air toxics indicates that the use of the proposed end sealant without additional control could result in a 24-hour impact which approaches the Florida Air Toxic Working Group's No-Threat Level for n-hexane. As this is the case, the additional control that would be achieved by using either water-base end sealant or thermal oxidation provides added justification for such a requirement as BACT.

The air toxics n-hexane, cyclohexane, and cyclohexylmethane result in maximum impacts which are well below the no-threat levels as proposed.

BACT Determination by DER:

Discussion:

The information presented by the applicant and the studies conducted by the Department suggests that the use of high solid/low VOC end sealant alone does not represent BACT for the proposed modernization of the facility. The use of low VOC end sealant alone does nothing to control VOC emissions resulting from the tab lube which is also part of the manufacturing process. Although the use of water-base end sealant would provide the greatest VOC control, the resulting cost to control VOC (\$7,016/ton) is judged to be prohibitively expensive.

The use of thermal oxidation, however, appears more reasonable as a BACT requirement. The applicant indicated that the cost per ton of controlling VOC in this manner would be approximately \$4,530. This cost (\$4,530/ton) is consistent with cost per ton levels that have been justified for other recent BACT determinations for pollutants that contribute to ozone formation (VOC and nitrogen oxides). In addition, such control would ensure that the air toxics associated with the end sealant are controlled by more than 58 percent.

It should be noted that the applicant's cost estimate to control VOC using thermal oxidation could be overstated. The applicant based its cost estimate on calculating annualized cost using a 12 percent interest rate. This exceeds the 10 percent interest that is suggested for cost per ton calculations as expressed in the EPA's OAQPS Control Cost Manual. In addition, recent evaluations of thermal oxidation for VOC control indicates that control efficiencies of 95% rather than the 90% proposed by the applicant are achievable.

Using the 10 percent interest rate suggested by EPA and the 95% control efficiency, the cost per ton of reducing VOC's is estimated to be \$3,992/ton. This cost provides further justification for requiring this level of control based on recent BACT determinations. Based on this estimate, the cost of providing control using thermal oxidation would increase the cost of manufacturing lids with the new modules by 10.4 cents per thousand. This added manufacturing cost is judged to be insignificant and further substantiates the use of thermal oxidation as BACT for the facility.

In addition to the localized benefits that could be obtained from VOC control at the facility, providing such control would have a significant impact on the amount of total VOC being emitted from stationary sources in Florida. The recent emissions inventory indicates that given the total VOC emissions resulting from the

modernization project, Metal Container Corporation in Gainesville would be ranked as the sixth highest VOC emitter in Florida and the largest VOC emitter in the Northeast District. As this is the case, any justifiable measures which would lower VOC emissions at this facility are worthy of consideration.

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 and using thermal oxidation with the following specifications:

End Sealant	3.2 pounds VOC per gallon
Thermal Oxidizer*	65% capture efficiency 95% destruction efficiency

*thermal oxidizer to control VOC capture from the both the end sealant and tab lube process.

Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
Department of Environmental Regulation
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

Carol M. Browner, Secretary
Dept. of Environmental Regulation

Date 1991

Date 1991



ANHEUSER-BUSCH COMPANIES

January 9, 1991

RECEIVED
JAN 15 1991
DER-BAQM

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

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

Dear Ms. Heron:

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

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

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

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

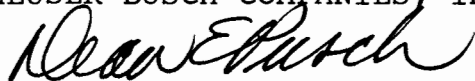
The application for the construction permit for the modernization project, which is currently under review, was submitted on August 29, 1990.

Page 2

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

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

A handwritten signature in cursive script, appearing to read "Dean E. Pusch".

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

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

(REVISED)

Prepared for:

ANHEUSER-BUSCH COMPANIES, INC.
St. Louis Missouri

Prepared by:

ECT

Environmental Consulting & Technology, Inc.

Gainesville, Florida

90100-0100

December 17, 1990

PREFACE

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

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1.0 INTRODUCTION AND SUMMARY

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

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

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

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

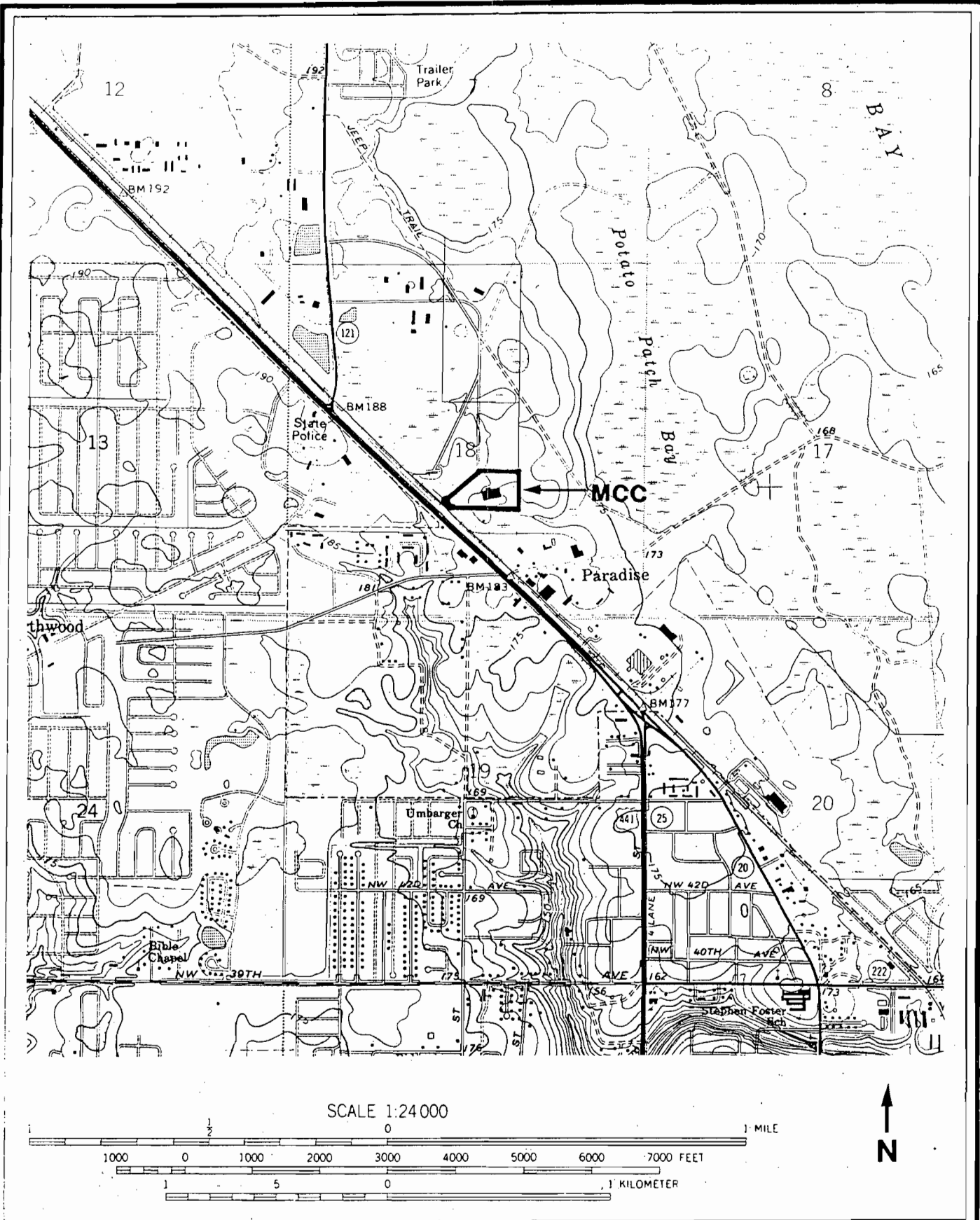


FIGURE 1-1.

SITE LOCATION MAP

Source: ECT, 1990.

ECT
 Environmental Consulting & Technology, Inc.

2.0 FACILITY LAYOUT AND EMISSION PARAMETERS

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

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

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

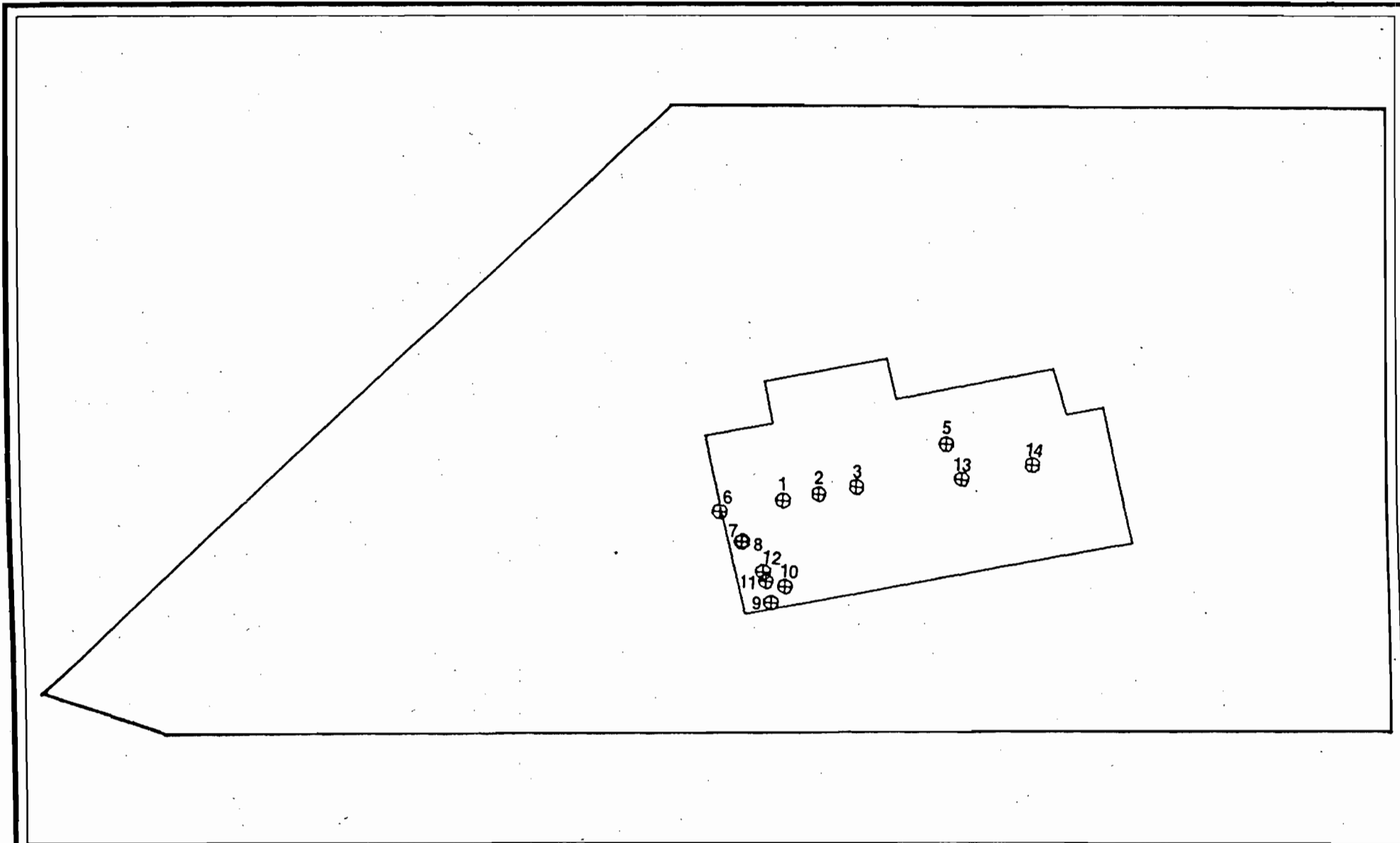


FIGURE 2-1.

FACILITY LAYOUT AND EMISSION POINT LOCATIONS

Source: ECT, 1990.

ECT

Environmental Consulting & Technology, Inc.

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

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

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

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

5

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

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

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

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

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

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

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

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

3.0 MODELING APPROACH

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

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

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

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

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

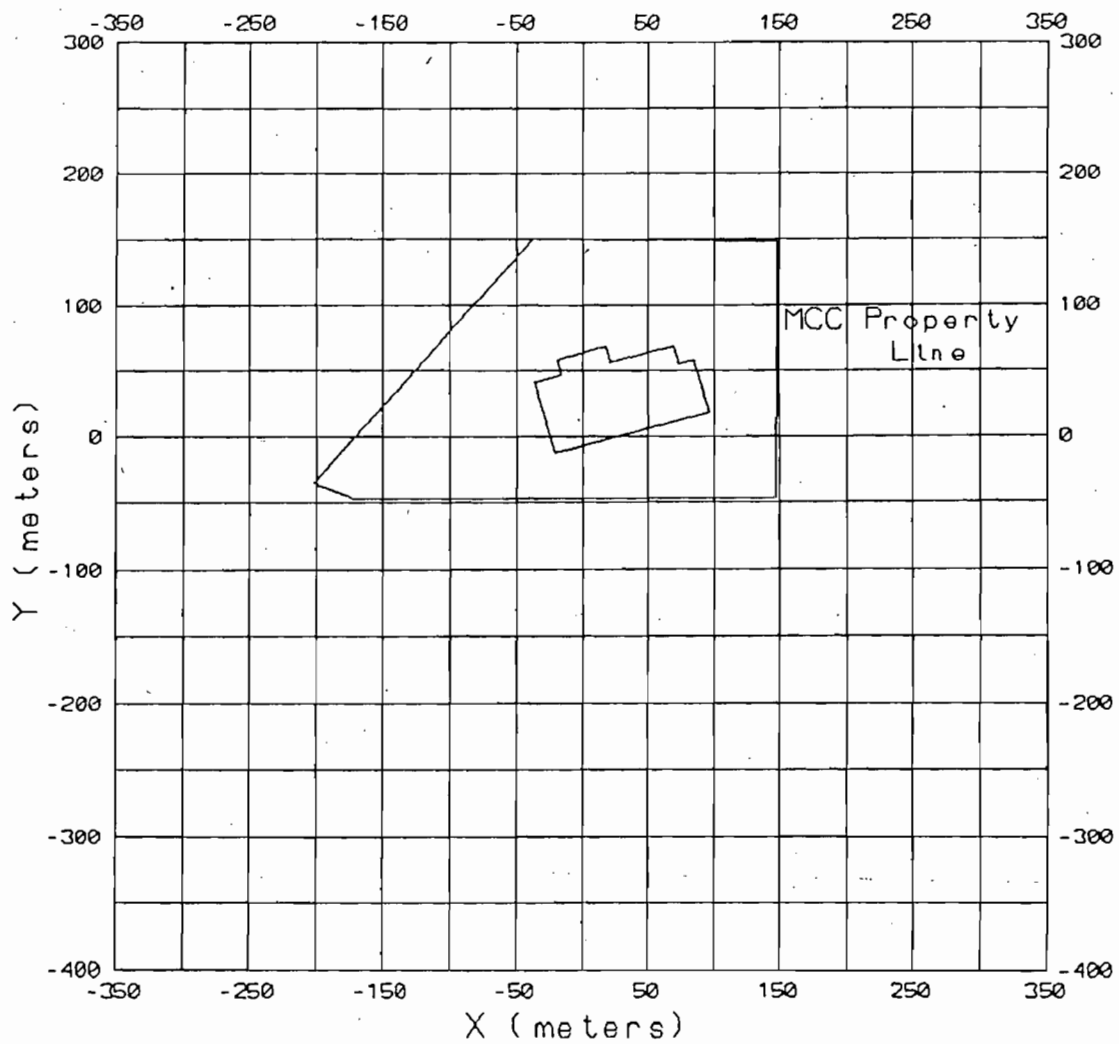


FIGURE 3-1.

MODELING RECEPTOR GRID

Source: ECT, 1990.

ECT
 Environmental Consulting & Technology, Inc.

4.0 MODELING RESULTS

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

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

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

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

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

*See Figure 3-1.

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

Source: ECT, 1990.

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

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

*See Figure 3-1.

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

Source: ECT, 1990.

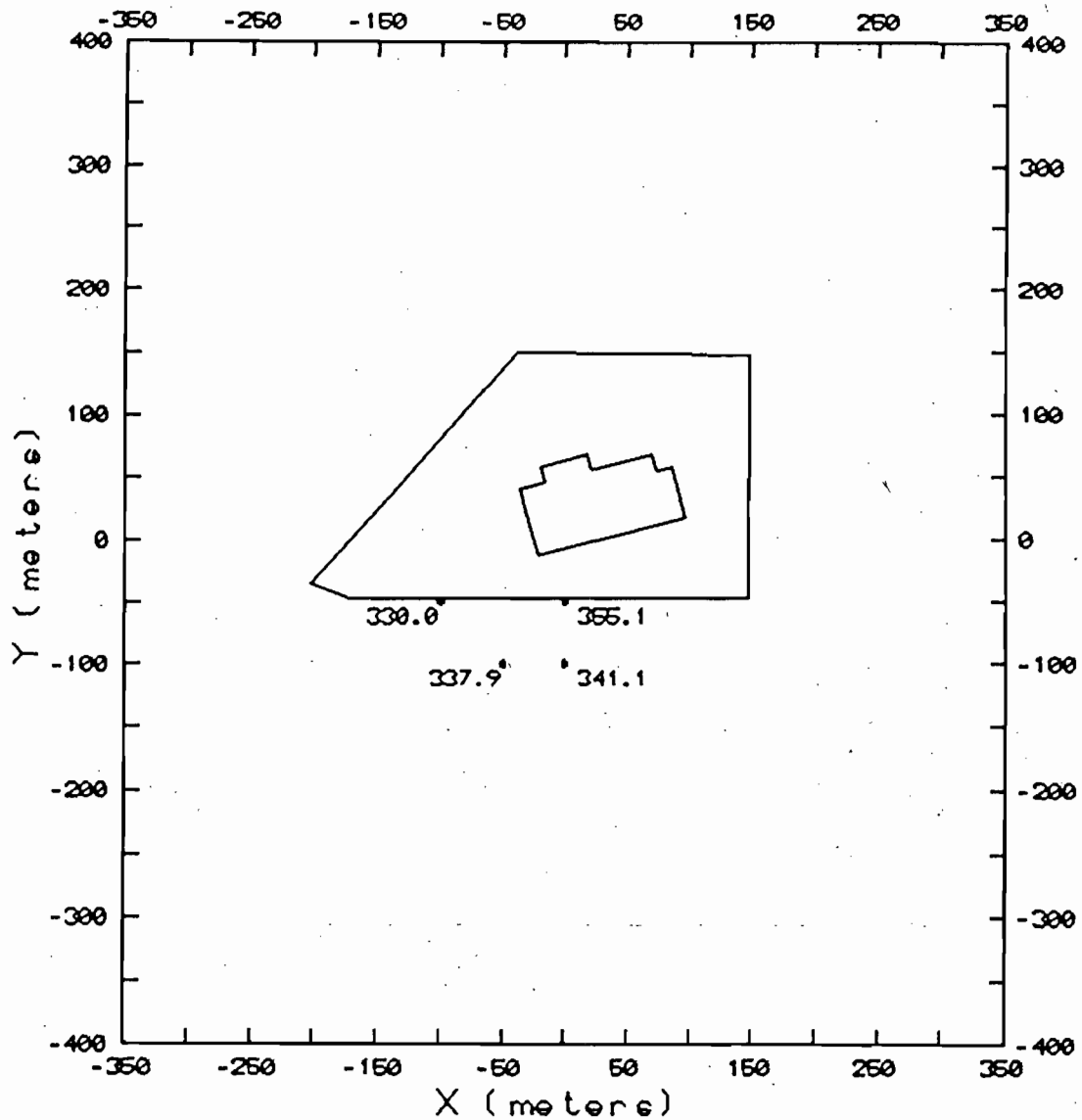


FIGURE 4-2.

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

Source: ECT, 1990.

ECT
Environmental Consulting & Technology, Inc.

REFERENCES

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



ANHEUSER-BUSCH COMPANIES

December 10, 1990

RECEIVED
DEC 14 1990
DER-BAQM

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

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

Dear Ms. Heron:

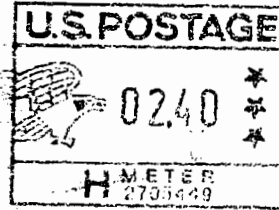
Metal Container Corporation has elected to change the cleanup solvent used at the Gainesville Lid Plant from a hexane-based product to one with a heptane base. This change will reduce emissions of n-hexane at the facility; thereby reducing both worker exposure and ambient off-property impacts.

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

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

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

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



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

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

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

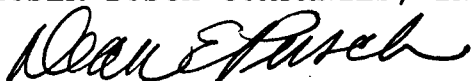
The modeling analysis in Attachment C shows that maximum impacts of potential toxics will be below the Department's no-threat levels, thus ensuring protection of public health.

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

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

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



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

c: J. Deon
C. Malladay
B. Andrews
A. Kutyma, NE Dist
J. Harper, EPA
C. Slauer, WPS
S. Baruch, DER Gainesville

ATTACHMENT A

TEXSOLVE C MATERIAL SAFETY DATA SHEET



Texaco Chemical Company

PO Box 27707
Houston TX 77227 7707
713 961 3711

CC TO MARLENE ALCAEDO - MCC SSH
DEAN POSCH ABC 202

October 23, 1990

RE: TEXSOLVE C
Per your request I talked
to TEXACO and this is their
response.

Ed
11/5/90

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

Dear Mr. Katzenmeyer:

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

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

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

Sincerely,

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

FEB:sgv
23/04

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NOV 08 1990

ENVIRONMENTAL ENGRG.
DEPT.

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INDUSTRIAL HYGIENE, TOXICOLOGY, AND MATERIAL
SAFETY DATA SHEETNOTE: NO REPRESENTATION IS MADE AS TO THE ACCURACY OF THE INFORMATION
HEREIN. SEE PAGE 7 FOR CONDITIONS UNDER WHICH DATA ARE FURNISHED.

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

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



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

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ENVIRONMENTAL PROTECTION		Code No.
Waste Disposal Method: Re-evaluation of the product may be required by the user at the time of disposal, since the product uses, transformations, mixtures and processes may change classification to non-hazardous or hazardous for reasons other than, or in addition to ignitability. (See Remarks for Waste Classification.)		75775
Procedures in Case of Breakege or Leakage: (Transportation Spills Call CHEMTREC (800) 424-9300) Eliminate all ignition sources including internal combustion engines and power tools. Ventilate area. Avoid breathing vapor. Use SCBA or supplied-air mask for lg spills or in confined areas. Contain spill. Remove with inert absorbant. Avoid contact with eyes.		
Remarks: Waste Classification: Product (as presently constituted) has the RCRA characteristic of ignitability and if discarded in its purchased form would have the hazardous waste number D001.		
PRECAUTIONS		
DANGER EXTREMELY FLAMMABLE CAUSES IRRITATION TO EYES MAY CAUSE IRRITATION TO SKIN		
Keep away from heat, sparks and flame. Keep container closed. Avoid contact with eyes and prolonged contact with skin. Use only in well-ventilated locations. Avoid prolonged breathing of vapor or mist. Keep head away from container when opening or dispensing. Wash thoroughly after handling.		
Requirements for Transportation, Handling and Storage: Transport, handle, and store in accordance with OSHA Regulation 1910.106 and applicable DOT Regulations.		
DOT Proper Shipping Name: See Additional Comments Pg. 6 DOT Hazard Class (if applicable): Flammable liquid, UN 1206		
CHEMICAL AND PHYSICAL PROPERTIES		
Boiling Point (°F)	<u>185-203</u>	Vapor Pressure <u>53@20 C</u> (mmHg)
Specific Gravity	<u>0.70 = 5.8 lb/gal</u> (H ₂ O=1)	Vapor Density <u>3.3</u> (Air=1)
Appearance and Odor	<u>Colorless liquid; mild odor</u>	
pH of undiluted product	<u>N.A.</u>	Solubility <u>Hex.</u>
Percent Volatile by Volume	<u>100</u>	Evaporation <u>N.D.</u> ()=1
Viscosity	<u>N.D.</u>	Other <u>-</u>
Hazardous Polymerizations <u> </u> Occur <u>X</u> Do not occur		
The Material Reacts Violently With (if others is checked below, see additional comments on page 6 for further details)		
Air	Water	Heat
		Strong Oxidizers
		Others
		None of These
		<u>X</u>

N.D. - Not Determined

N.A. - Not Applicable

< - Less Than

> - Greater Than



COMPOSITION Code No. **75726**

Chemical/Common Name	CAS No.	Exposure Limit	Range in %
*Hexane	110543	50ppm TWA ACGIH 50ppm TWA-OSHA	1.00 - 3.99
*Benzene	71432	10ppm TWA ACGIH 1 ppm TWA OSHA 5 ppm STEL OSHA	0.01 - 0.09
Contains 37% Raffinate (petroleum) catalytic reformer ethylene glycol-water countercurrent extracts CAS# 68410719 and 63% Distillate (petroleum). light distillate hydrotreating process, low boiling CAS# 68410979.	MIXTURE	None Established	95.00 - 99.99

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

SARA TITLE III

I. Title III Section 302/304 Extremely Hazardous Substance				
Component	CAS No.	%	RQ (Lbs)	TPQ (Lbs)
NONE				

II. CERCLA Section 102(a) Hazardous Substance			
Component	CAS No.	%	RQ (Lbs)
Benzene	71432	0.01-0.09	1000
Toluene	108883	1.00-3.99	1000 ?
Cyclohexane	110827	4.00-10.99	1000

III. Title III Section 311 Hazard Categorization					
Acute	Chronic	Fire	Pressure	Reactive	Not Applicable
X		X			

IV. Title III Section 313 Toxic Chemicals		
Component	CAS No.	%
Cyclohexane	110827	4.00-10.99
Toluene	108883	4.00-10.99 ?

**PRODUCT SHIPPING LABEL**

Case No. 75726

75726 TEXSOLVE C

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

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

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

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

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

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

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

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

HEALTH EMERGENCY TELEPHONE: (914) 831-3400

**Texaco
2000 Westchester Avenue
White Plains, New York 10650**

**For Additional Technical Information Concerning:
Fuels (914) 838-7336
Lubricants/Antifreezes (914) 838-7508
Chemicals (512) 459-8549**

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



ADDITIONAL COMMENTS	Code No. 75726
----------------------------	-------------------

STATE OF MICHIGAN CRITICAL MATERIALS ACT (REVISED 1989)

No critical materials present.

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

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

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

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

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

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

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

ATTACHMENT B

VOC EMISSIONS

METAL CONTAINER CORPORATION
 GAINESVILLE LID PLANT
 MODERNIZATION PROJECT

VOC Emissions Basis

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

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

Shell Press Specifications

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

Coating/Solvent Specifications

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

VOC Emissions (by shell press production)

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

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

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

ATTACHMENT C

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

ATTACHMENT VIII

POTENTIAL TOXIC EMISSIONS ESTIMATES

AND IMPACT ASSESSMENT

(REVISED 12/5/90)

Table VIII-1

METAL CONTAINER CORPORATION – GAINESVILLE LID PLANT
MODERNIZATION PROJECT

POTENTIAL TOXIC EMISSIONS

Basis of Estimates

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

Emissions

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

TOXIC EMISSIONS ESTIMATE

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

IMPACT ASSESSMENT

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

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

TABLE VIII-2

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

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

*Florida Air Toxic Working Group

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

ATTACHMENT D

PARTS CLEANERS AND TANKS DATA

PARTS CLEANERS

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

SOLVENT

Safety-Kleen Unit - Stoddard Solvent

Heptane Unit - Teksolve C

EMISSION ESTIMATES

Safety-Kleen Unit

service interval - 8 weeks

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

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

Heptane Unit

service interval - 4 weeks

Assume 20% lost (MCC records)

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

Teksolve C/yr

END SEALANT COMPOUND STORAGE TANKS

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

THROUGHPUT OF COMPOUND (DM 2140M)

$$0.0174 \text{ gal/1000 lids} \times 11,445,000,000 \text{ lids/yr} \\ = 199,143 \text{ gal/yr}$$

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

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

EMISSIONS ESTIMATES

Breathing Losses

None - indoor tanks

Working Losses

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

where

Lw = loss (lb/yr)

Mv = molecular weight of vapor = 89

P = vapor pressure (psia) = 4.1

V = capacity (gal)

N = turnovers/yr

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

Kc = product factor (1.0)

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

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



ANHEUSER-BUSCH COMPANIES

October 5, 1990

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OCT 11 1990

DER-BAQM

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

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

Dear Mr. Fancy:

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

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

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

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

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

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

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

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

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

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

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



D. E. Pusch

DEP/tms

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

A. Kutynow, NE Dist
J. Harper, EPA
C. Shaver, NPS

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

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

EQUIPMENT IDENTIFICATION BY MODULE

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

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

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

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

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

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

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

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

METAL CONTAINER CORPORATION
 GAINESVILLE LID PLANT
 MODERNIZATION PROJECT

VOC Emissions Basis

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

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

Shell Press Specifications

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

Coating/Solvent Specifications

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

VOC Emissions (by shell press production)

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

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

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



ANHEUSER-BUSCH COMPANIES

April 23, 1991

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

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

Dear Mr. Andrews:

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

Incorporation of Supplemental Data

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

Specific Condition 1 - VOC Content

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

Specific Condition 7 - Thermal Oxidizer

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

feasible control

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

Specific Condition 11 - Waste Solvent Analysis

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

BACT Determination - Environmental Impact Analysis

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

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

The maximum 24-hour impact of n-hexane (287 ug/m^3) due to emissions from the entire facility is well below the Florida Air Toxic Working Group's No-Threat Level (430 ug/m^3). Thus, these emissions do not pose a threat to public health or welfare.

BACT Determination - Discussion

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

General Comment

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

MCC Designation

Module 4
Module 5
Module 6
Module 7

DER Designation

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

a) currently permitted

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

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Dean E. Pusch
Sr. Environmental Scientist

DEP:cd

File Copy



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

October 2, 1990

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

Dear Mrs. Shaver:

Re: Completeness Review

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

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

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

Sincerely,

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

CHF/BM/t

Ready File



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 2, 1990

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

Dear Ms. Harper:

Re: Completeness Review

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

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

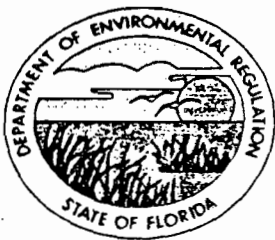
If there are any questions, please call Barry Andrews at (904) 488-1344 or write to me at the above address. All comments, written or oral, should be received by the above requested dates. If it is convenient to FAX a response to us, the FAX number to use is (904)922-6979.

Sincerely,

C. H. Fancy, P.E.
Chief

Bureau of Air Regulation

CHF/BM/t



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

September 28, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Lanham:

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

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

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

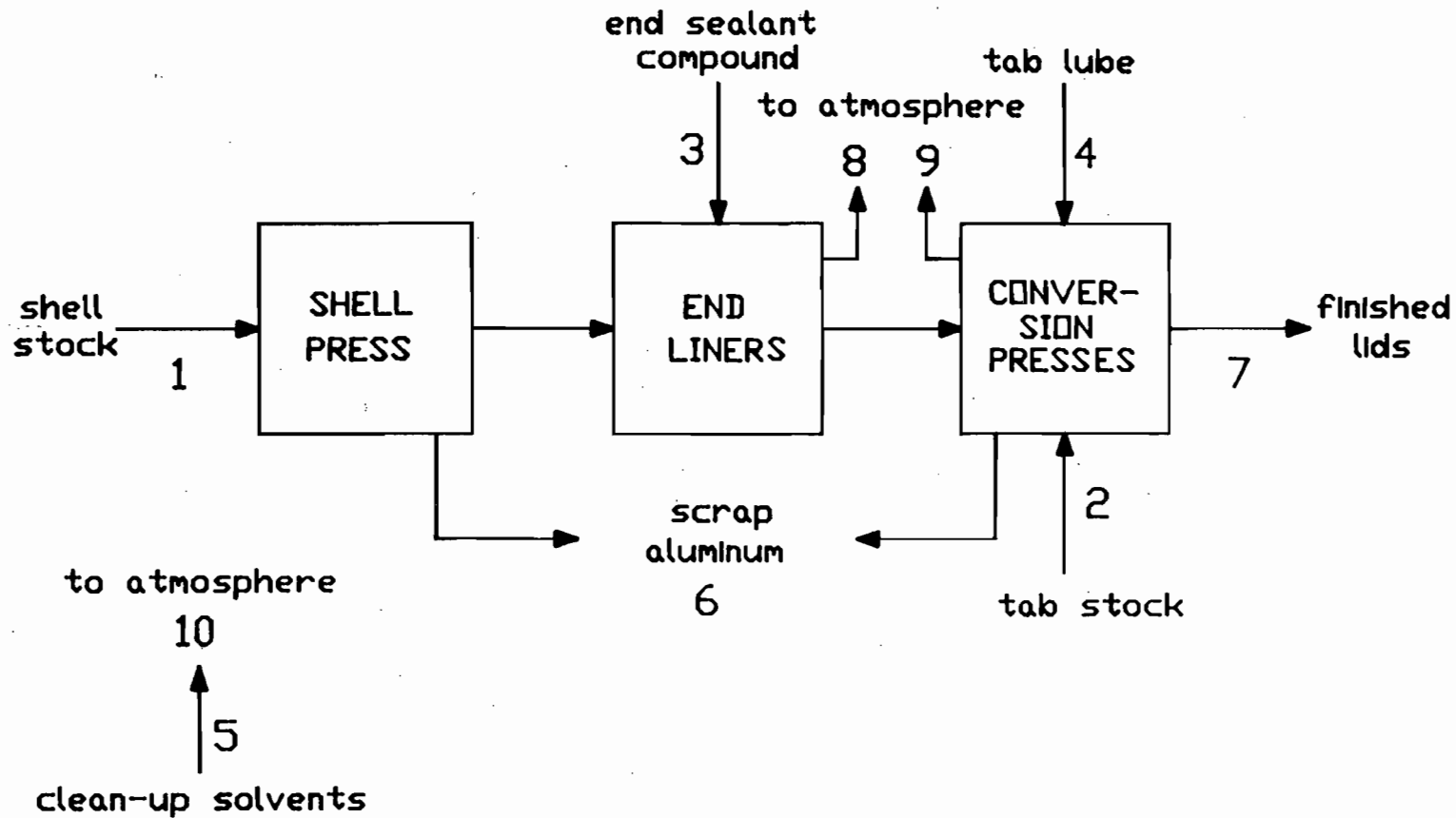
We will resume processing your application as soon as this information is received.

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

Sincerely,

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

CHE/TH/plm



GAINESVILLE MODERNIZATION - FLOW DIAGRAM

TYPICAL MODULE BASED ON SHELL PRESS - ONE OF FOUR



ANHEUSER-BUSCH COMPANIES

RECEIVED

AUG 31 1990

DER-BAQM

August 29, 1990

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

Dear Mr. Fancy:

Enclosed please find ten copies of an Application to Construct for a modernization project for the Gainesville Lid Plant. The project will increase the facility's lid production capacity and subsequently will increase potential annual emissions of volatile organic compounds 241 tons above the currently permitted 323 tons. These emissions will be minimized by the use of low solvent/high solids compounds.

The copy of the document in the binder includes the signed and sealed copies of the application form. A check in the amount of \$5,000 is enclosed to cover the application fee.

Please call me at 314-577-4162 with any and all questions. As the permit is the critical path for construction, anything that can be done to expedite review would be appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Sr. Environmental Scientist
Enclosure
DEP:cd
DEP82990

*cc. J. Huggs
J. Tolsted
S. Tschuch, DER Gainesville - 11-7-90*

1990 AUG 31 AM 11:50
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DER - MAIL ROOM



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 3. Instructions in full on reverse.
 4. Call us if you have any questions!



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SHIPPER'S REFERENCE 164-1907-162

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ANHEUSER BUSCH INCORPORATED
 Mr. Dean E. Puschi
 ONE BUSCH PLACE
 ST LOUIS, MO
 63118

5 RECIPIENT (COMPANY NAME)
Florida Dept. of Env. Regulation
Chief Bureau of Air Regulation
 Mr. C. H. Fancy, P.E.
 Twin Towers Office Building
 2600 Blair Stone Road
 Tallahassee, Florida
 32399-2400

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OTHER		
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TOTAL		

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DIMENSIONAL/CHARGED WEIGHT

10 METHOD OF PAYMENT
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BILL RECIPIENT
 3rd Party
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Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

000265

CHECK DATE	CHECK NUMBER
8/22/90	000265

Manufacturers Hanover Bank (Delaware) 1201 Market Street Wilmington, Delaware 19801	VOID 180 DAYS AFTER ISSUANCE	62-26 311	-09 2338
	PAY THIS AMOUNT \$ *****5,000.00*****		
TO THE ORDER OF Florida Department of Environmental Regulation	METAL CONTAINER CORPORATION <i>J.P. Summa</i> AUTHORIZED SIGNATURE		AUTHORIZED SIGNATURE

DEPARTMENT OF ENVIRONMENTAL REGULATION

\$5,000pd.
8-31-90
Recpt. #157159

AC01-185835
PSD-FL-153

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



RECEIVED BOB GRAHAM GOVERNOR

AUG 31 1990 VICTORIA J. TSCHINKEL SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCE DER-203M

SOURCE TYPE: Aluminum Lid Manufacturing [] New¹ [X] Existing¹
APPLICATION TYPE: [X] Construction [] Operation [] Modification
COMPANY NAME: Metal Container Corporation COUNTY: Alachua

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Lid Modules No. 1 thru No. 4

SOURCE LOCATION: Street 5909 N.W. 18th Drive City Gainesville
UTM: East 369.38 Km North 3287.23 Km
Latitude 29 ° 42 ' 5 "N Longitude 82 ° 20 ' 53 "W

APPLICANT NAME AND TITLE: Joseph J. Waters, Plant Manager
APPLICANT ADDRESS: 5909 N.W. 18th Drive, Gainesville, FL 32606

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Metal Container Corporation

I certify that the statements made in this application for a construction permit permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Joseph J. Waters
Joseph J. Waters, Plant Manager
Name and Title (Please Type)

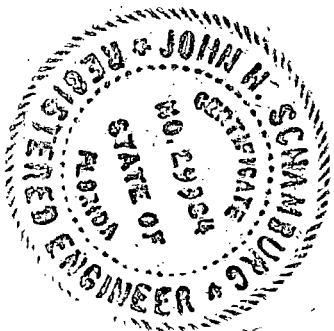
Date: 8/17/90 Telephone No. 904/378-8800

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed John H. Schamburg

John H. Schamburg, P.E.

Name (Please Type)

Metal Container Corporation

Company Name (Please Type)

3636 S. Geyer Road, Suite 400

St. Louis, MO 63127

Mailing Address (Please Type)

Florida Registration No. 29984 Date: 8/29/90 Telephone No. 314/577-9556

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The project will consist of modernization of the facility. Two existing lid modules (2 shell presses, 5 conversion presses & 11 liners) will remain. Other existing equipment will be replaced by two new shell presses, 7 conversion presses and 3 liners. See Attachment II for a detailed description of the project.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 4-1-91 Completion of Construction 8-1-92

Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Permit No. AC 01-159304 issued 9/25/89 expires 7/31/91; permit No. A001-144728 issued 4/20/89 expires 5/1/93.

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

- 1. Is this source in a non-attainment area for a particular pollutant? No
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
- 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. Yes
- 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. Yes
- 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No
- 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No

- a. If yes, for what pollutants? _____
- b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram see Attachment V.6
	Type	% Wt		
end sealant	VOC	40.5	201.0	3
tab lube	VOC	94.5	45.8	4
solvent	VOC	100.0	18.9 ^a	5
mineral spirits	VOC	100.0	1.8	5
aluminum	--	--	9510	1, 2

^a represents 77.7% of total usage; 22.3% is recovered for recycle.

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 9510 lb/hr aluminum shell and tab stock

2. Product Weight (lbs/hr): 7030 lb/hr finished lids

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
VOC	145.0	563.8	N/A		145.0	563.8	8, 9, 10

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

aluminum scrap and waste compound, solvent, and mineral spirits to recycle.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

8. description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[] Yes [X] No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[X] Yes [] No

Contaminant

Rate or Concentration

volatile organic compounds

3.7 lb/gal

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

volatile organic compounds

3.2 lb/gal

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
low solvent/high solids compound
Efficiency:*

2. Operating Principles:

4. Capital Costs:

*Explain method of determining

- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters n/a

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary). see Attachment VI

1.

- a. Control Device: water-base end sealant
- b. Operating Principles:
- c. Efficiency:¹ 56% reduction from proposed level
- d. Capital Cost: \$4.5 million
- e. Useful Life: 10 yr
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost: } \$1,339,460 per year
- i. Availability of construction materials and process chemicals: good
- j. Applicability to manufacturing processes: operational & technical restrictions
- k. Ability to construct with control device, install in available space, and operate within proposed levels: operational & technical restrictions necessitate additional equipment to meet committed production levels.

2.

- a. Control Device: thermal oxidizer
- b. Operating Principles: incineration
- c. Efficiency:¹ 50% reduction from proposed level
- d. Capital Cost: \$1.8 million
- e. Useful Life: 10 yr
- f. Operating Cost: }
- g. Energy:²
- h. Maintenance Cost: } \$774,715 per yr
- i. Availability of construction materials and process chemicals: good

¹ Explain method of determining efficiency.

² Energy to be reported in units of electrical power - KWH design rate.

Applicability to manufacturing processes: Capture methods have never been successfully demonstrated

k. Ability to construct with control device, install in available space, and operate within proposed levels: **very difficult**

3.

- a. Control Device: **high solids/low solvent end sealant**
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals: **good**
- j. Applicability to manufacturing processes: **good**
- k. Ability to construct with control device, install in available space, and operate within proposed levels: **currently in use**

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

Describe the control technology selected:

- 1. Control Device: **high solids/low solvent end sealant**
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company: **Metal Container Corporation**
- (2) Mailing Address: **3713 Harmon Avenue**
- (3) City: **Oklahoma City** (4) State: **OK**

¹Efficiency in method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager: **Marlene M. Accardo**

(6) Telephone No.: 314/957-9529

(7) Emissions:¹

Contaminant	Rate or Concentration
volatile organic compounds	3.4 lb/gal

(8) Process Rate:¹ 1989 production - 6.9 billion lids

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration
-------------	-----------------------

(8) Process Rate:¹

10. Reason for selection and description of systems: efficiency, quality of product, cost effectiveness

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.
See Attachment VII.A

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No

b. Was instrumentation calibrated in accordance with Department procedures?

[] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant

Emission Rate

TSP _____ grams/sec

SO² _____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

APPLICATION TO CONSTRUCT AN AIR POLLUTION SOURCE

METAL CONTAINER CORPORATION

GAINESVILLE LID PLANT MODERNIZATION

Submitted to:

Florida Department of Environmental Regulation

Tallahassee, Florida

August 15, 1990

INTRODUCTION

Metal Container Corporation intends to modernize the Gainesville Lid Plant. The modernization will result in an increase in the facility's annual production, based on shell press capacity, from an existing 6.528 billion lids to 11.445 billion lids. This project will result in an annual potential increase of 241 tons of volatile organic compound emissions above the currently permitted 323 tons. Potential VOC emissions will be minimized through the use of low-solvent, high solids compounds.

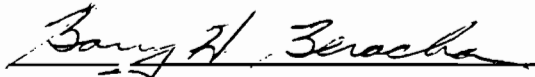
The following pages present the application form and supporting information for a permit to construct an air pollution source as required by the Florida Department of Environmental Regulation.

November 30, 1989

DELEGATION OF AUTHORITY FORM

Joseph Waters

Pursuant to authority conferred by the Board of Directors of Metal Container Corporation as set out in resolutions adopted on November 7, 1989 a copy of which is attached hereto, I hereby delegate to you authority to sign, in the name and on behalf of this corporation, in your capacity as Plant Manager at Gainesville Lid Plant reports or routine documents required to be filed by this corporation under or by virtue of any environmental law or regulation of any nature whatsoever whether of the United States or of any of the sundry states.



Barry H. Beracha
President

MA/1114SR.FRM



**Metal Container
Corporation**

ONE OF THE LARGEST MANUFACTURERS

WHEREAS, it has been determined that it is in the best interests of this corporation to specify those individuals who are authorized to sign any documents required by state and federal environmental laws and regulations.

NOW, THEREFORE IT IS

RESOLVED, that effective as of November 7, 1989, the President or any Vice Presidents of this corporation be and he is hereby authorized to sign, and also, in writing, to delegate to any other officers, employees or agents of this corporation the authority to sign in the name and on behalf of this corporation reports or routine documents required to be filed by this corporation under or by virtue of any environmental law or regulation of any nature whatsoever whether of the United States or of any of the sundry states. Any delegation of authority made pursuant to this resolution shall be in writing, and a copy thereof filed with the Vice President and Secretary, the Vice President and General Counsel and the Director of Environmental Engineering & Site Services Department of Anheuser-Busch Companies, Inc.

76721

ATTACHMENT II.A
PROJECT DESCRIPTION

PROJECT DESCRIPTION

Metal Container Corporation intends to modernize its Gainesville Lid Center. This modernization will increase the facility's annual shell press production capacity to 11.445 billion lids from the existing 6.528 billion lids.

The modernization project will consist 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 currently permitted as Module 4,
 - b) the shell press, three conversion presses, and three liners permitted as Module 6,
 - c) the six additional 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.

A list of the production equipment which will be in-place at the facility after the modernization is presented in Table II.A-1.

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

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

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

DEP725-1

PROCESS DESCRIPTION

Aluminum stock is stamped into lid "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.

EMISSIONS

Emissions of volatile organic compounds occur from the use of end sealant, tab lube, and clean-up solvents. After modernization, the facility will have the potential to emit 563.8 tons per year of VOC. This represents an increase of 240.8 tons above the currently permitted annual rate of 323 tons.

Emissions from the facility will be controlled by the use of low solvent compound and through optimization of production operation to minimize usage of the compounds.

ATTACHMENT V.2
EMISSION ESTIMATES

EMISSION ESTIMATES

Estimates of emissions of volatile organic compounds due to operation of the Gainesville plant after the modernization project are presented in the attached spreadsheet. These emissions are based on the compositions of compounds that are currently used at the plant. VOC data sheets and Material Safety Data Sheets for these compounds are attached.

The estimates are based on shell press capacity, which assumes that all shells produced are lined and converted. Compound usage rates are based on 1989 operations. Short-term emissions are calculated assuming that all shell presses operate simultaneously at 100 percent capacity. Annual emissions assume a 90 percent shell press operating efficiency.

The maximum hourly VOC emission from the facility after the project will be 144.3 pounds per hour. Annual emission from the facility will be 563.8 tons of VOC.

Attachment VIII presents a speciation of these VOC emissions by their potentially toxic constituents.

METAL CONTAINER CORPORATION
 GAINESVILLE LID PLANT
 MODERNIZATION PROJECT

VOC Emissions Basis

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

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

Shell Press Specifications

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

Coating/Solvent Specifications

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

VOC Emissions (by shell press production)

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

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

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

VOC DATA SHEET

PROPERTIES OF THE COATING 'AS SUPPLIED' BY THE MANUFACTURER

Coating Manufacturer: DEXTER PACKAGING PRODUCTS

Coating Identification: 0612A110 DM 2140M

Batch Identification:


Supplied To: Metal Container

Properties of the coating as supplied(1) to the customer:

- A. Coating Density (Dc)s : 7.822 lb/gal .937 kg/l
 ___ ASTM D1475 _X_ Other(2)
- B. Total Volatiles (Wv)s : 40.48 Weight Percent
 ___ ASTM D2369 _X_ Other(2)
- C. Water Content: 1. (Ww)s: .00 Weight Percent
 ___ ASTM D3792 ___ ASTM D4017 _X_ Other(2)
 2. (Uw)s: .00 Volume Percent
 ___ Calculated _X_ Other(2)
- D. Organic Volatiles (Wo)s : 40.48 Weight Percent
- E. Nonvolatiles Content (Un)s: 44.92 Volume Percent
- F. VOC Content (VOC)s: 1. 3.166 lb/gal coating less water
 or .379 kg/l coating less water
 2. 7.049 lb/gal solids
 or .845 kg/l solids

(1) The subscript 's' denotes each value is for the coating 'as supplied' by the manufacturer.

(2) The Other method used is a theoretical calculation based on available data.

Signed:  Date: 06-OCT-89

Date Prepared: 06/06/89

Prepared By: L R CRUZ

SECTION I

MANUFACTURER'S NAME: Dexter Coatings
 STREET ADDRESS : 90 Carson Road Birmingham, Alabama 35215
 TELEPHONE : (205) 854-5454 Night: (205) 854-5454
 MANUFACTURER'S CODE: 0612A110
 TRADE NAME : DM-2140M

SECTION II - HAZARDOUS INGREDIENTS

Ingredient(s)	Weight Percent	Toxicity Data	Vapor Press. mm Hg @ 20C
HEPTANE CAS: 142-82-5	10 - 20	TWA: 400 (ppm) STEL: 500 (ppm) TLV-C: UK PEL: 500 (ppm) Other: UK	100.0
HEXANE CAS: 110-54-3	20 - 30	TWA: 50 (ppm) STEL: UK TLV-C: UK PEL: 500 (ppm) Other: UK	180.0

SECTION III - PHYSICAL PROPERTIES + FIRE AND EXPLOSION HAZARDS

FLASHPOINT FOR 0612A110 = 15 Deg. F Setflash CC LEL: 1.20
 FLAMMING RANGE = 149 to 210 Deg. F.
 DOT CATEGORY = Flammable Liquid
 OSHA Classification = Flammable Liquid - Class IB
 VAPOR DENSITY: Heavier than air.
 EXTINGUISHING MEDIA: Use water fog, foam, dry chemical, or carbon dioxide.
 VOLATILE ORGANIC CONTENT: 3.111 pounds per gallon less water.

SECTION IV - HEALTH INFORMATION

ACUTE: Over exposure by inhalation may cause irritation of the respiratory tract, headache, dizziness, or drowsiness.
 SKIN OR EYE CONTACT: Irritant to the eyes and skin.
 EMERGENCY AND FIRST AID PROCEDURES: INHALATION: Remove from exposure.
 EYE CONTACT: Flush immediately with large amounts of running water for at least 15 minutes. SKIN CONTACT: Remove contaminated clothing and wash skin with soap and water. INGESTION: Drink water.
 If necessary, consult a physician for any of these conditions.
 MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: Unknown at this time.
 CHRONIC HEALTH EFFECTS: Those hazardous materials listed in Section II may affect the following organs: -Central nervous system-

SECTION V - REACTIVITY DATA

STABILITY: Stable. HAZARDOUS DECOMPOSITION BY-PRODUCTS: Fumes may contain carbon monoxide and oxides of nitrogen. May produce hazardous fumes when heated to decomposition as in welding.

 SECTION VI - SPILL OR LEAK PROCEDURES

Remove all sources of ignition, avoid breathing vapors, ventilate area, and remove with inert absorbant and non-sparking tools. Dispose of in accordance with local, state, and federal regulations. Before attempting to clean up, see Section II.

 SECTION VII - PRECAUTIONS IN HANDLING

VENTILATION: Provide general dilution or local exhaust ventilation to keep TWA and LEL below acceptable limits and to remove decomposition products.

RESPIRATORY PROTECTION: Where general dilution or local exhaust fails to adequately dilute the TWA/PEL of the material, then respiratory protection should be used as follows: In accord with 29CFR 1910.134, use NIOSH/MSHA approved air line type respirators or hoods for enclosed and confined areas. Air purifying respirators may be used for other areas.

PROTECTIVE EQUIPMENT: Chemical resistant gloves are required for prolonged or repeated contact. Use safety eyeware designed to protect against splash of liquids.

Do not take internally. Containers should be grounded when pouring. Avoid free fall of liquid in excess of a few inches. Make sure the drum is completely empty before attempting to weld or braze. The drum should be industrially cleaned prior to reuse. Do not flame cut, braze, or weld without a NIOSH approved respirator or appropriate ventilation.

 SECTION VIII - ENVIRONMENTAL DATA

SARA Title III Information and Proposition 65

CAS Number	Chemical Name	SARA 302	SARA 313	Prop. 65
		% by Wt. (1)	% by Wt. (2)	% by Wt. (3)
71-43-2	BENZENE	---	---	.00118

FOOTNOTES

- (1) Extremely hazardous substance, Sec. 302
 (2) Toxic Chemical, Sec. 313
 (3) State of California Safe Drinking Water and Toxic Enforcement Act of 1986, Proposition 65 (Prop. 65)

 SECTION IX - ADDITIONAL INFORMATION

Those materials listed in Section II with an asterisk have been listed by one of the following testing agencies: National Toxicology Program, International Agency for Research and Cancer, or OSHA.

KEEP CONTAINER CLOSED WHEN NOT IN USE!

NFPA HMIS CLASSIFICATION: Health- 1 Flammability- 3 Reactivity- 0
 See Section VII for personal protection equipment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

VOC DATA SHEET:

PROPERTIES OF THE COATING "AS SUPPLIED" BY THE MANUFACTURER

Coating Manufacturer: JENKIN-GUERIN, INC.
Coating Identification: ANCHOR #3810 TAB LUBE
Batch Identification: 063089
Supplied To: METAL CONTAINER CORPORATION

Properties of the coating as supplied to the customer:

- A. Coating Density (Dc)s : 6.35 lb/gal kg/1
B. Total Volatiles (Wv)s : 94.5 Weight Percent
C. Water Content: 1. (Ww)s .0073 Weight Percent
D. Organic Volatiles (Wo)s : 94.5 Weight Percent
E. Nonvolatiles Content (Vn)s : 5.5 Volume Percent
F. VOC Content (VOC)s: 1. 6.0008 lb/gal coating less water
or kg/1 coating less water
2. lb/gal solids
or kg/1 solids

Remarks: (use reverse side)

1The subscript "s" denotes each value is for the coating "as supplied" by the manufacturer.

2Explain the other method used under "Remarks".

Signed: J.C. Smith Date 8/8/89

Material Safety Data Sheet
 May be used to comply with
 OSHA's Hazard Communication Standard,
 29 CFR 1910.1200. Standard must be
 consulted for specific requirements.

U.S. Department of Labor
 Occupational Safety and Health Administration
 (Non-Mandatory Form)
 Form Approved
 OMB No. 1218-0072



IDENTITY (As Used on Label and List) ANCHOR #3810 TAB LUBE	Note: Blank spaces are not permitted. If any item is not applicable, or no information is available, the space must be marked to indicate that.
--	---

Section I

Manufacturer's Name JENKIN-GUERIN, INC.	Emergency Telephone Number 1-800-424-9300
Address (Number, Street, City, State, and ZIP Code) 4480 HUNT AVENUE	Telephone Number for Information 314-652-2905
ST. LOUIS, MO 63110-2182	Date Prepared REVISED 2/24/89
	Signature of Preparer (optional)

Section II — Hazardous Ingredients/Identity Information

Hazardous Components (Specific Chemical Identity; Common Name(s))	OSHA PEL	ACGIH TLV	Other Limits Recommended	% (optional)
ISOPARAFFIN SOLVENT	NE	2100 mg/m ³	400 PPM	

SPECIAL NOTE: ALL INGREDIENTS COMPLY WITH THE FEDERAL FOOD & DRUG ADMINISTRATION REGULATIONS. (1) REGULATION 178.3910, SURFACE LUBRICANTS USED IN MANUFACTURE OF METALLIC ARTICLES. THESE REGULATIONS APPEARED IN THE FEDERAL REGISTER OF APRIL 1, 1979, PAGES 700 THRU 705.

THE SOLVENT USED AS A DILUENT FOR THE ABOVEMENTIONED ITEM (REGULATION #1) HAS BEEN CLASSIFIED BY THE FEDERAL DRUG ADMINISTRATION UNDER REGULATION 178.3910. THE SOLVENT IS USED MERELY AS A DILUENT AND SHOULD BE ALLOWED TO EVAPORATE SO THAT THE RESIDUE COATING LEFT ON THE CAN PARTS CONSISTS ONLY OF ITEM I.

ANCHOR #3810 TAB LUBE MEETS RULE 66 AND SCAQMD RULE 102.

Section III — Physical/Chemical Characteristics

Boiling Point INITIAL	350°	Specific Gravity (H₂O = 1) @ 60/60° F.	(G. 21) 0.757
Vapor Pressure (mm Hg.) '2 psia @ 70° F.	0.27mm	Melting Point	0° F
Vapor Density (AIR = 1) @ 230° F.	> 1	Evaporation Rate (Butyl Acetate = 1)	0.7
Solubility in Water NIL			
Appearance and Odor WATER WHITE COLOR WITH MILD MINERAL OIL ODOR			

Section IV — Fire and Explosion Hazard Data

Flash Point (Method Used) 141° F. C.O.C.	Flammable Limits	LEL 0.6%	UEL 7%
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Extinguishing Media
 DRY CHEMICAL, FOAM, CARBON DIOXIDE

Special Fire Fighting Procedures
 SHUT OFF SOURCE. USE WATER FOG OR SPRAY TO COOL EXPOSED EQUIPMENT AND CONTAINERS.
 WEAR SELF-CONTAINED BREATHING APPARATUS.

Unusual Fire and Explosion Hazards VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND, OR BE MOVED BY VENTILATION AND IGNITED BY HEAT, PILOT LIGHTS, OTHER FLAMES AND IGNITION SOURCES AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT. NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM, PRODUCT CAN IGNITE EXPLOSIVELY.

Section V — Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable	X	STRONG OXIDIZING AGENTS

Compatibility (Materials to Avoid)
STRONG OXIDIZING AGENTS SUCH AS LIQUID CHLORINE, CONCENTRATED OXYGEN, SODIUM OR CALCIUM HYPOCHLORITE.

Hazardous Decomposition or Byproducts
FUMES, SMOKE AND CARBON MONOXIDE IN THE CASE OF INCOMPLETE COMBUSTION.

Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	

Section VI — Health Hazard Data

Route(s) of Entry:	Inhalation? YES	Skin? YES	Ingestion? YES
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Health Hazards (Acute and Chronic)
HIGH VAPOR CONCENTRATION (GREATER THAN 1000 PPM) ARE IRRITATING TO THE EYES, AND RESPIRATORY TRACT. MAY CAUSE HEADACHES AND DIZZINESS IN EXTREMELY HIGH CONCENTRATIONS.

Carcinogenicity:	NTP? NO	IARC Monographs? NO	OSHA Regulated? NO
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Signs and Symptoms of Exposure DIZZINESS, DROWSINESS

Medical Conditions Generally Aggravated by Exposure DIZZINESS, DROWSINESS

Emergency and First Aid Procedures **INGESTION:** DO NOT INDUCE VOMITING; CALL PHYSICIAN. **SKIN CONTACT:** REMOVE ANY CONTAMINATED CLOTHING, AND WASH SKIN WITH SOAP AND WARM WATER. **EYES:** FLUSH WITH CLEAR WATER FOR 15 MINUTES OR UNTIL IRRITATION SUBSIDES. IF IRRITATION PERSISTS, CALL A PHYSICIAN. **INHALATION:** REMOVE FROM EXPOSURE AND CALL A PHYSICIAN IMMEDIATELY.

Section VII — Precautions for Safe Handling and Use

Steps to Be Taken in Case Material Is Released or Spilled
RECOVER FREE LIQUID. ADD ABSORBENT (SAND, EARTH, SAWDUST, ETC.) MINIMIZE BREATHING VAPORS. OPEN ALL WINDOWS AND DOORS. KEEP PETROLEUM PRODUCTS OUT OF SEWERS AND WATERCOURSES BY DIKING OR IMPOUNDING. ADVISE AUTHORITIES IF PRODUCT HAS ENTERED OR MAY ENTER SEWERS, WATERCOURSES, OR EXTENSIVE LAND AREAS.

Waste Disposal Method

DISPOSE OF ABSORBENT AT AN APPROVED DISPOSAL FACILITY ACCORDING TO FEDERAL, STATE, & LOCAL REGULATIONS.

Precautions to Be Taken in Handling and Storing

KEEP CONTAINERS CLOSED WHEN NOT IN USE. DO NOT HANDLE OR STORE NEAR HEAT, SPARKS, FLAME OR STRONG OXIDANTS.

Other Precautions AVOID BREATHING OIL MIST. AVOID PROLONGED OR REPEATED CONTACT WITH SKIN, REMOVE CONTAMINATED CLOTHING, LAUNDRER BEFORE REUSE. DISCARD OIL-SOAKED SHOES. WASH SKIN THOROUGHLY WITH SOAP AND WATER AFTER CONTACT, BEFORE BREAKS AND MEALS, BEFORE APPLYING COSMETICS, AND END OF WORK PERIOD.

Section VIII — Control Measures

Respiratory Protection (Specify Type) NORMALLY NONE NEEDED

Ventilation	Local Exhaust USE LOCAL EXHAUST TO CAPTURE FUMES AND VAPORS	Special PROVIDE ADEQUATE VENTILATION
	Mechanical (General) NORMAL SHOP VENTILATION	Other SEE LOCAL EXHAUST

Protective Gloves RUBBER **Eye Protection** SPLASH GOGGLES OR FACE SHIELD

Other Protective Clothing or Equipment USE CHEMICAL-RESISTANT APRON OR OTHER CLOTHING TO AVOID REPEATED SKIN CONTACT.

Work/Hygienic Practices WORK SKIN THOROUGHLY WITH SOAP AND WATER AFTER CONTACT, BEFORE BREAKS, MEALS, AND END OF WORK PERIOD.

*Supplied by
Apperson Chem. Inc.*

MATERIAL SAFETY DATA SHEET

MAK 201-100

Unocal Corporation
1201 West 5th Street, P.O. Box 7600
Los Angeles, California 90051

Product Name: **HEXANE**
Product Code No: **11487**
Issue Date: **12/01/89** Page 1

<p>MANUFACTURER</p> <p>UNOCAL CHEMICALS DIVISION - PETROCHEM. GROUP UNION OIL COMPANY OF CALIFORNIA 1345 NORTH MEACHAM ROAD SCHAUMBURG, ILLINOIS 60196</p> <p>CONTACT FOR FURTHER INFORMATION: YOUR LOCAL SALES OFFICE (LAST PAGE)</p>	<p>Transportation Emergencies: CHEMTREC (800) 424-9300 Cont. U.S. (202) 483-7616 (Collect) from Alaska & Hawaii</p> <p>Health Emergencies: Call LOS ANGELES POISON INFORMATION CENTER (24 hrs) 1-(800)-356-3129</p>
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PRODUCT IDENTIFICATION

PRODUCT NAME: HEXANE

SYNONYMS: AMSCO SOLV 1487
C6H14
ISOHEXANE
PCN UCD 11487
PCN UCD 1487
UCD 871 A
UCD 871A

GENERIC NAME: VOLATILE SOLVENT

CHEMICAL FAMILY: HYDROCARBON MIXTURE

DOT PROPER SHIPPING NAME: HEXANE

ID NUMBER: UN1208

DOT HAZARD CLASSIFICATION: FLAMMABLE LIQUID

SECTION I - COMPONENTS	PERCENT	EXPOSURE LIMIT	UNITS	AGENCY	TYPE
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HAZARDOUS COMPONENTS					
N-HEXANE					
CAS #: 110-54-3		50.000	ppm	ACGIH	TWA
		500.000	ppm	MSHA	TWA
		50.000	ppm	OSHA	TWA
		50.000	ppm	CAL OSHA	TWA
OTHER HEXANE ISOMERS					
CAS #: VARIES		500.000	ppm	ACGIH	TWA
		1000.000	ppm	ACGIH	STEL
		500.000	ppm	MSHA	TWA
		500.000	ppm	OSHA	TWA
		1000.000	ppm	OSHA	STEL
		500.000	ppm	CAL OSHA	TWA

OTHER COMPONENTS

--NONE--

UNION OIL CO.

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THIS PRODUCT CONTAINS THE FOLLOWING CHEMICALS SUBJECT TO THE REPORTING REQUIREMENTS OF SARA 313 AND 40 CFR 372:

	CAS NUMBER	WEIGHT %
--NONE--		

SECTION II - EMERGENCY AND FIRST AID PROCEDURES ***EMERGENCY***
Have physician call LOS ANGELES POISON INFORMATION CENTER (24 hrs) (800) 356-3129

EYE CONTACT:

IF IRRITATION OR REDNESS DEVELOPS, MOVE VICTIM AWAY FROM EXPOSURE AND INTO FRESH AIR. FLUSH EYES WITH CLEAN WATER. IF SYMPTOMS PERSIST, SEEK MEDICAL ATTENTION.

SKIN CONTACT:

REMOVE CONTAMINATED SHOES AND CLOTHING AND CLEANSE AFFECTED AREA(S) THOROUGHLY BY WASHING WITH MILD SOAP AND WATER. IF IRRITATION OR REDNESS DEVELOPS AND PERSISTS, SEEK MEDICAL ATTENTION.

INHALATION (BREATHING):

IF RESPIRATORY SYMPTOMS DEVELOP, MOVE VICTIM AWAY FROM SOURCE OF EXPOSURE AND INTO FRESH AIR. IF SYMPTOMS PERSIST, SEEK MEDICAL ATTENTION. IF VICTIM IS NOT BREATHING, IMMEDIATELY BEGIN ARTIFICIAL RESPIRATION. IF BREATHING DIFFICULTIES DEVELOP, OXYGEN SHOULD BE ADMINISTERED BY QUALIFIED PERSONNEL. SEEK IMMEDIATE MEDICAL ATTENTION.

INGESTION (SWALLOWING):

ASPIRATION HAZARD: DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH BECAUSE THIS MATERIAL CAN ENTER THE LUNGS AND CAUSE SEVERE LUNG DAMAGE. IF VICTIM IS DROWSY OR UNCONSCIOUS, PLACE ON THE LEFT SIDE WITH THE HEAD DOWN. IF POSSIBLE, DO NOT LEAVE VICTIM UNATTENDED. SEEK MEDICAL ATTENTION.

COMMENTS:

NOTE TO PHYSICIANS: EXPOSURE TO HIGH CONCENTRATIONS OF THIS MATERIAL (E.G., IN ENCLOSED SPACES OR WITH DELIBERATE ABUSE) MAY BE ASSOCIATED WITH CARDIAC ARRHYTHMIAS. EPINEPHRINE AND OTHER SYMPATHOMIMETIC DRUGS MAY INITIATE CARDIAC ARRHYTHMIAS IN PERSONS EXPOSED TO THIS MATERIAL. OTHER DRUGS WITH LESS ARRHYTHMOGENIC POTENTIAL SHOULD BE CONSIDERED. IF SYMPATHOMIMETIC DRUGS ARE ADMINISTERED, OBSERVE FOR THE DEVELOPMENT OF CARDIAC ARRHYTHMIAS.

SECTION III - HEALTH HAZARDS/ROUTES OF ENTRY**EYE CONTACT:**

THIS MATERIAL MAY CAUSE MILD EYE IRRITATION. DIRECT CONTACT WITH THE LIQUID OR EXPOSURE TO VAPORS OR MISTS MAY CAUSE STINGING, TEARING AND REDNESS.

SKIN CONTACT:

THIS MATERIAL MAY CAUSE MILD SKIN IRRITATION. PROLONGED OR REPEATED CONTACT MAY CAUSE REDNESS, BURNING, AND DRYING AND CRACKING OF THE SKIN. CONTACT MAY RESULT IN SKIN ABSORPTION BUT SYMPTOMS OF TOXICITY ARE NOT ANTICIPATED BY THIS ROUTE ALONE UNDER NORMAL CONDITIONS OF USE. PERSONS WITH PRE-EXISTING SKIN DISORDERS MAY BE MORE SUSCEPTIBLE TO THE EFFECTS OF THIS MATERIAL.

INHALATION (BREATHING):

WHILE THIS MATERIAL HAS A LOW DEGREE OF TOXICITY, BREATHING HIGH CONCENTRATIONS OF VAPORS OR MISTS MAY CAUSE IRRITATION OF THE NOSE AND THROAT, NAUSEA AND SIGNS OF NERVOUS SYSTEM DEPRESSION (E.G. HEADACHE, DROWSINESS, DIZZINESS, LOSS OF COORDINATION, AND FATIGUE). PROLONGED OR REPEATED EXPOSURE TO VAPORS OR MISTS MAY

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CAUSE DAMAGE TO PERIPHERAL NERVES. RESPIRATORY SYMPTOMS ASSOCIATED WITH PRE-EXISTING LUNG DISORDERS (E.G., ASTHMA-LIKE CONDITIONS) MAY BE AGGRAVATED BY EXPOSURE TO THIS MATERIAL.

INGESTION (SWALLOWING):

WHILE THIS MATERIAL HAS A LOW DEGREE OF TOXICITY, INGESTION OF EXCESSIVE QUANTITIES MAY CAUSE IRRITATION OF THE DIGESTIVE TRACT, NAUSEA, AND SIGNS OF NERVOUS SYSTEM DEPRESSION (E.G., HEADACHE, DROWSINESS, DIZZINESS, LOSS OF COORDINATION, AND FATIGUE). ASPIRATION HAZARD - THIS MATERIAL CAN ENTER LUNGS DURING SWALLOWING OR VOMITING AND CAUSE LUNG INFLAMMATION AND DAMAGE.

COMMENTS:

THIS MATERIAL HAS NOT BEEN IDENTIFIED AS A CARCINOGEN BY NTP, IARC OR OSHA. PRE-EXISTING PERIPHERAL NERVE DISORDERS MAY BE AGGRAVATED BY EXPOSURE TO THIS MATERIAL. PERSONS WITH PRE-EXISTING HEART DISORDERS MAY BE MORE SUSCEPTIBLE TO IRREGULAR HEARTBEATS (ARRHYTHMIAS) IF EXPOSED TO HIGH CONCENTRATIONS OF THIS MATERIAL (SEE SECTION II - NOTE TO PHYSICIANS). REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE (SOMETIMES REFERRED TO AS SOLVENT OR PAINTERS' SYNDROME). INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THIS PRODUCT MAY BE HARMFUL OR FATAL.

SECTION IV - SPECIAL PROTECTION INFORMATION**VENTILATION:**

IF CURRENT VENTILATION PRACTICES ARE NOT ADEQUATE TO MAINTAIN AIRBORNE CONCENTRATIONS BELOW THE ESTABLISHED EXPOSURE LIMITS (SEE SECTION I), ADDITIONAL VENTILATION OR EXHAUST SYSTEMS MAY BE REQUIRED. WHERE EXPLOSIVE MIXTURES MAY BE PRESENT, ELECTRICAL SYSTEMS SAFE FOR SUCH LOCATIONS MUST BE USED.

RESPIRATORY PROTECTION:

IF AIRBORNE CONCENTRATIONS EXCEED ESTABLISHED EXPOSURE LIMITS (SEE SECTION I), USE A SUPPLIED AIR RESPIRATOR. DO NOT USE A CHEMICAL CARTRIDGE RESPIRATOR.

PROTECTIVE GLOVES:

THE USE OF GLOVES IMPERMEABLE TO THE SPECIFIC MATERIAL HANDLED IS ADVISED TO PREVENT SKIN CONTACT AND POSSIBLE IRRITATION.

EYE PROTECTION:

APPROVED EYE PROTECTION TO SAFEGUARD AGAINST POTENTIAL EYE CONTACT, IRRITATION OR INJURY IS RECOMMENDED.

OTHER PROTECTIVE EQUIPMENT:

IT IS SUGGESTED THAT A SOURCE OF CLEAN WATER BE AVAILABLE IN THE WORK AREA FOR FLUSHING EYES AND SKIN. IMPERVIOUS CLOTHING SHOULD BE WORN AS NEEDED.

SECTION V - REACTIVITY DATA**STABILITY:**

STABLE UNDER NORMAL CONDITIONS OF STORAGE AND HANDLING.

CONDITIONS TO AVOID (STABILITY):

AVOID ALL POSSIBLE SOURCES OF IGNITION (SEE SECTIONS VII AND VIII).

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To	Marlene Acosta	
Co.	Section 2	Co. 5 Pages
Dept.		Phone #
Fax #		Fax #

UNION OIL CO.

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Issue Date: 12/01/89**SECTION V - REACTIVITY DATA****INCOMPATIBILITY (MATERIALS TO AVOID):**

THIS PRODUCT IS INCOMPATIBLE WITH STRONG ACIDS OR BASES, OXIDIZING AGENTS AND SELECTED AMINES.

HAZARDOUS DECOMPOSITION PRODUCTS:

COMBUSTION MAY YIELD CARBON MONOXIDE AND/OR CARBON DIOXIDE. DO NOT BREATHE SMOKE OR FUMES. WEAR APPROPRIATE PROTECTIVE EQUIPMENT.

HAZARDOUS POLYMERIZATION:

WILL NOT OCCUR

POLYMERIZATION CONDITIONS TO AVOID:

NONE KNOWN

SECTION VI - SPILL AND LEAK PROCEDURES

HIGHWAY OR RAILWAY SPILLS
Call CHEMTREC (800) 424-9300 Cont. U.S.
(Collect) (202) 483-7616 from Alaska & Hawaii

PRECAUTIONS IN CASE OF RELEASE OR SPILL:

EXTREMELY FLAMMABLE. KEEP ALL SOURCES OF IGNITION AND HOT METAL SURFACES AWAY FROM SPILL/RELEASE. STAY UPWIND AND AWAY FROM SPILL/RELEASE. ISOLATE HAZARD AREA AND LIMIT ENTRY TO EMERGENCY CREW. STOP SPILL/RELEASE IF IT CAN BE DONE WITHOUT RISK. WEAR APPROPRIATE PROTECTIVE EQUIPMENT INCLUDING RESPIRATORY PROTECTION AS CONDITIONS WARRANT (SEE SECTION IV). PREVENT SPILLED MATERIAL FROM ENTERING SEWERS, STORM DRAINS, OTHER UNAUTHORIZED TREATMENT DRAINAGE SYSTEMS AND NATURAL WATERWAYS. DIKE FAR AHEAD OF SPILL FOR LATER RECOVERY OR DISPOSAL. SPILLED MATERIAL MAY BE ABSORBED INTO AN APPROPRIATE ABSORBENT MATERIAL. NOTIFY FIRE AUTHORITIES AND APPROPRIATE FEDERAL, STATE AND LOCAL AGENCIES. IMMEDIATE CLEANUP OF ANY SPILL IS RECOMMENDED.

EPA REPORTABLE QUANTITY:

NONE

WASTE DISPOSAL METHOD:

DISPOSE OF PRODUCT IN ACCORDANCE WITH LOCAL, COUNTY, STATE, AND FEDERAL REGULATIONS.

SECTION VII - STORAGE AND SPECIAL PRECAUTIONS**HANDLING AND STORAGE PRECAUTIONS:**

KEEP CONTAINER(S) TIGHTLY CLOSED. USE AND STORE THIS MATERIAL IN COOL, DRY, WELL VENTILATED AREAS AWAY FROM HEAT, DIRECT SUNLIGHT, HOT METAL SURFACES AND ALL SOURCES OF IGNITION. POST AREA "NO SMOKING OR OPEN FLAME." BOND AND GROUND ALL EQUIPMENT WHEN TRANSFERRING FROM ONE VESSEL TO ANOTHER. STORE ONLY IN APPROVED CONTAINERS. KEEP AWAY FROM INCOMPATIBLE MATERIALS (SEE SECTION V). PROTECT CONTAINER(S) AGAINST PHYSICAL DAMAGE. THE USE OF EXPLOSION-PROOF EQUIPMENT IS RECOMMENDED AND MAY BE REQUIRED (SEE APPROPRIATE FIRE CODES). DO NOT ENTER CONFINED SPACES SUCH AS TANKS OR PITS WITHOUT FOLLOWING PROPER ENTRY PROCEDURES SUCH AS ASTM D-4276. OUTDOOR OR DETACHED STORAGE IS PREFERRED. INDOOR STORAGE SHOULD MEET OSHA STANDARDS AND APPROPRIATE FIRE CODES. THE USE OF RESPIRATORY PROTECTION IS ADVISED WHEN CONCENTRATIONS EXCEED THE ESTABLISHED EXPOSURE LIMITS (SEE SECTIONS I AND IV). WASH THOROUGHLY AFTER HANDLING. DO NOT WEAR CONTAMINATED CLOTHING OR SHOES. USE GOOD PERSONAL HYGIENE PRACTICE. "EMPTY" CONTAINERS RETAIN RESIDUE (LIQUID AND/OR VAPOR) AND CAN BE DANGEROUS. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS OR OTHER SOURCES OF IGNITION; THEY MAY EXPLODE AND CAUSE INJURY OR DEATH. "EMPTY" DRUMS SHOULD BE COMPLETELY DRAINED, PROPERLY BUNGED AND PROMPTLY SHIPPED TO THE SUPPLIER OR A DRUM RECONDITIONER. ALL OTHER CONTAINERS SHOULD BE DISPOSED OF IN AN ENVIRONMENTALLY SAFE MANNER AND IN ACCORDANCE

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SECTION VII - STORAGE AND SPECIAL PRECAUTIONS

WITH GOVERNMENTAL REGULATIONS. BEFORE WORKING ON OR IN TANKS WHICH CONTAIN OR HAVE CONTAINED THIS PRODUCT, REFER TO OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION REGULATIONS, ANSI Z49.1, AND OTHER GOVERNMENTAL AND INDUSTRIAL REFERENCES PERTAINING TO CLEANING, REPAIRING, WELDING, OR OTHER CONTEMPLATED OPERATIONS.

SECTION VIII - FIRE AND EXPLOSION HAZARD DATA

NFPA HAZARD CLASS	HEALTH HAZARD:	1	HAZARD RANKING 0 - LEAST 1 - SLIGHT 2 - MODERATE 3 - HIGH 4 - EXTREME * - CHRONIC HEALTH EFFECTS	FLASH POINT -20 F TCC
	FLAMMABILITY:	3		
	REACTIVITY:	0		
	OTHER:			
HMIS HAZARD CLASS	HEALTH HAZARD:	1*		
	FLAMMABILITY:	3		
	REACTIVITY:	0		
	PPE:			

LOWER EXPLOSIVE LIMIT (% VOL.)UPPER EXPLOSIVE LIMIT (% VOL.)

1.0

8.0

EXTINGUISHING MEDIA:

DRY CHEMICAL, CARBON DIOXIDE, HALON, FOAM OR WATER SPRAY IS RECOMMENDED. WATER MAY BE INEFFECTIVE.

UNUSUAL FIRE & EXPLOSION HAZARDS:

THIS MATERIAL IS EXTREMELY FLAMMABLE AND MAY BE IGNITED BY HEAT, SPARKS, FLAME OR OTHER SOURCES OF IGNITION (e.g. STATIC ELECTRICITY, PILOT LIGHTS, MECHANICAL/ELECTRICAL EQUIPMENT). VAPORS MAY TRAVEL CONSIDERABLE DISTANCES TO A SOURCE OF IGNITION WHERE THEY MAY IGNITE, FLASHBACK OR EXPLODE. VAPOR/AIR EXPLOSION HAZARD INDOORS/OUTDOORS OR IN SEWERS. VAPORS ARE HEAVIER THAN AIR AND MAY ACCUMULATE IN LOW AREAS. IF CONTAINER IS NOT PROPERLY COOLED, IT MAY EXPLODE IN THE HEAT OF A FIRE.

SPECIAL FIRE FIGHTING PROCEDURES:

WEAR APPROPRIATE PROTECTIVE EQUIPMENT INCLUDING RESPIRATORY PROTECTION AS CONDITIONS WARRANT (SEE SECTION IV). STOP SPILL/RELEASE IF IT CAN BE DONE WITHOUT RISK. MOVE UNDAMAGED CONTAINERS FROM FIRE AREA IF IT CAN BE DONE WITHOUT RISK. WATER SPRAY MAY BE USEFUL IN MINIMIZING OR DISPERSING VAPORS AND COOLING EQUIPMENT EXPOSED TO HEAT AND FLAME. AVOID SPREADING BURNING LIQUID WITH WATER USED FOR COOLING PURPOSES.

SECTION IX - PHYSICAL DATA

***UNLESS OTHERWISE NOTED, VALUES ARE AT
20 C/68 F AND 760 mm Hg/1 atm.

<u>APPROX BOILING POINT</u>	(AIR = 1) <u>VAPOR DENSITY</u>	(N-BUTYL ACETATE = 1) <u>EVAPORATION RATE</u>	<u>% VOLATILE</u>
150-158 F	3.0	8.1	100
<u>% SOLUBILITY IN WATER</u>	<u>VAPOR PRESSURE (mm Hg)</u>		
<5	140		
<u>SPECIFIC GRAVITY</u>	<u>APPROX. BULK DENSITY (lb/gal)</u>		
0.674 (60 F/60 F)	5.61 (60 F)		

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SECTION IX - PHYSICAL DATA**APPEARANCE**

CLEAR, LITTLE IF ANY COLOR, LIQUID

ODOR

CHARACTERISTIC

SECTION X - PRECAUTIONARY WARNING

DANGER! EXTREMELY FLAMMABLE. OVEREXPOSURE TO VAPORS OR MISTS MAY CAUSE INJURY TO NERVOUS SYSTEM. ASPIRATION HAZARD IF SWALLOWED. CAN ENTER LUNGS AND CAUSE DAMAGE. KEEP AWAY FROM HEAT, SPARKS, FLAME OR OTHER SOURCES OF IGNITION (E.G., STATIC ELECTRICITY, PILOT LIGHTS OR MECHANICAL/ELECTRICAL EQUIPMENT). DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING. AVOID BREATHING VAPORS OR MISTS. DO NOT TASTE OR SWALLOW. KEEP CONTAINER CLOSED. USE WITH ADEQUATE VENTILATION. WASH THOROUGHLY AFTER HANDLING. FIRST AID: DANGER - ASPIRATION HAZARD. IF SWALLOWED DO NOT INDUCE VOMITING. CALL A PHYSICIAN. IN CASE OF CONTACT, FLUSH EYES OR SKIN WITH PLENTY OF WATER. NOTE TO PHYSICIANS: EPINEPHRINE AND OTHER SYMPATHOMIMETIC DRUGS SHOULD BE USED CAUTIOUSLY, IF AT ALL. IF USED, OBSERVE FOR DEVELOPMENT OF CARDIAC ARRHYTHMIAS.

SECTION XI - DOCUMENTARY INFORMATION

ISSUE DATE: 12/01/89 PRODUCT CODE NO. 11487

PREV. DATE: 03/21/89 PREV. PROD. CODE NO. 11487

MSDS NO: N/A PREV. MSDS NO: N/A

DISCLAIMER OF EXPRESSED AND IMPLIED WARRANTIES

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UNION OIL CO.

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FOR FURTHER INFORMATION, CONTACT YOUR LOCAL SALES OFFICE

ATLANTA	(404) 934-0343 (800) 633-2362	LOS ANGELES	(714) 228-4700
BALTIMORE (Outside MD)	(301) 355-2737 (800) 638-7676	MIAMI (FL Only) (FL Only)	(305) 634-2411 (800) 621-3841 (800) 282-0537
BIRMINGHAM (Outside AL) (Inside AL)	(205) 995-9776 (800) 328-1611 (800) 328-1610	NASHVILLE (TN Only)	(615) 320-5474 (800) 325-7685
CHARLOTTE (NC Only) (SC, GA, VA)	(704) 588-2633 (800) 532-6103 (800) 438-2968	NY/NJ (NY Only)	(201) 574-9890 (800) 526-4376
CHICAGO	(312) 257-9300	PHILADELPHIA CONSHOHOCKEN	(215) 753-1903 (215) 828-1010
CINCINNATI	(513) 422-0176	NEW ENGLAND	(401) 438-7240 (800) 523-0725
CLEVELAND	(216) 425-4600	SAN FRANCISCO/ OAKLAND AREA	(415) 562-1976
DALLAS/FT. WRTH	(214) 298-8233	TWIN CITIES	(612) 227-8020
DETROIT	(313) 772-0870	WICHITA	(316) 838-3335
HOUSTON	(713) 643-3517		
KANSAS CITY	(816) 231-7600		

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MATERIAL SAFETY DATA SHEET

UNOCAL

AUG 28 1989

MINERAL SPIRITS UNOCAL CHEMICALS DIVISION
PETROCHEMICALS GROUPProduct Name: [REDACTED]
Product Code No: [REDACTED]Page 1 of 5
Issue Date: [REDACTED]
Revised 12/01/80MANUFACTURER:UNOCAL CHEMICALS DIVISION
UNION OIL COMPANY OF CALIFORNIA
1345 N. MEACHAM
SCHAUMBURG, ILLINOIS 60196CONTACT FOR FURTHER INFORMATION:
MSDS COORDINATOR (312) 619-2644Transportation Emergencies:
Call CHEMTREC
(800) 424-9300 Cont. U.S.
(202) 483-7616 (Collect)
from Alaska & Hawaii
Health Emergencies:
CALL LOS ANGELES POISON
INFORMATION CENTER (24 hrs.)
1-(800)-356-3129PRODUCT IDENTIFICATIONPRODUCT NAME: ODORLESS MINERAL SPIRITSSYNONYMS: AMSCO SOLV 1241
IMSGENERIC NAME: VOLATILE SOLVENTCHEMICAL FAMILY: HYDROCARBON MIXTUREDOT PROPER SHIPPING NAME: PETROLEUM NAPHTHAID NUMBER: UN1255DOT HAZARD CLASSIFICATION: COMBUSTIBLE LIQUIDCAS NUMBER: 64741-65-7

SECTION I - HAZARDOUS INGREDIENTS/EXPOSURE LIMITS	CAS NO	LIMITS	UNITS	AGENCY	TYPE
ODORLESS MINERAL SPIRITS (COMPARE TO STODDARD		100.0000	PPM	ACGIH	TWA
SOLVENT 8092-41-3)		200.0000 300.0000	PPM	ACGIH OSHA	STEL TWA

SECTION II - EMERGENCY AND FIRST AID PROCEDURES***EMERGENCY***
Have physician call LOS ANGELES POISON
INFORMATION CENTER (24 hrs.) (800) 356-3129EYE CONTACT:

IF IRRITATION OR REDNESS FROM EXPOSURE TO VAPORS DEVELOPS, MOVE VICTIM AWAY FROM EXPOSURE AND INTO FRESH AIR. IF IRRITATION OR REDNESS PERSISTS, SEEK MEDICAL ATTENTION. FOR DIRECT CONTACT, HOLD EYELIDS APART AND FLUSH THE AFFECTED EYE(S) WITH CLEAN WATER. SEEK MEDICAL ATTENTION.

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SECTION II - EMERGENCY AND FIRST AID PROCEDURES

EMERGENCY

From physician call LOS ANGELES POISON
 INFORMATION CENTER (24 hrs.) (800) 356-3129

SKIN CONTACT:

REMOVE CONTAMINATED CLOTHING. CLEANSE AFFECTED AREA(S) THOROUGHLY BY WASHING WITH MILD SOAP AND WATER. IF IRRITATION OR REDNESS DEVELOPS AND PERSISTS, SEEK MEDICAL ATTENTION.

INHALATION (BREATHING):

IF IRRITATION OF NOSE OR THROAT DEVELOPS, MOVE VICTIM AWAY FROM SOURCE OF EXPOSURE AND INTO FRESH AIR. IF SYMPTOMS PERSIST, SEEK MEDICAL ATTENTION. IF VICTIM IS NOT BREATHING, ARTIFICIAL RESPIRATION SHOULD BE ADMINISTERED. IF BREATHING DIFFICULTIES DEVELOP, OXYGEN SHOULD BE ADMINISTERED BY QUALIFIED PERSONNEL. SEEK IMMEDIATE MEDICAL ATTENTION.

INGESTION (SWALLOWING):

ASPIRATION HAZARD: DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH BECAUSE THIS MATERIAL CAN ENTER THE LUNGS AND CAUSE SEVERE LUNG DAMAGE. IF VICTIM IS DROWSY OR UNCONSCIOUS, PLACE ON THE LEFT SIDE WITH THE HEAD DOWN. IF POSSIBLE, DO NOT LEAVE VICTIM UNATTENDED. SEEK MEDICAL ATTENTION.

SECTION III - HEALTH HAZARDS/ROUTES OF ENTRY

EYE CONTACT:

THIS MATERIAL MAY CAUSE EYE IRRITATION. DIRECT CONTACT WITH THE LIQUID OR EXPOSURE TO VAPORS OR MISTS MAY CAUSE STINGING, TEARING AND REDNESS.

SKIN CONTACT:

THIS MATERIAL MAY CAUSE SKIN IRRITATION. PROLONGED OR REPEATED CONTACT MAY CAUSE REDNESS, BURNING, AND DRYING AND CRACKING OF THE SKIN. NO HARMFUL EFFECTS HAVE BEEN DEMONSTRATED IN SKIN ABSORPTION STUDIES. PERSONS WITH PRE-EXISTING SKIN DISORDERS MAY BE MORE SUSCEPTIBLE TO THE EFFECTS OF THIS MATERIAL.

INHALATION (BREATHING):

WHILE THIS MATERIAL HAS A LOW DEGREE OF TOXICITY, BREATHING HIGH CONCENTRATIONS OF VAPORS OR MISTS MAY CAUSE IRRITATION OF THE NOSE, THROAT AND SIGNS OF NERVOUS SYSTEM DEPRESSION (E.G., DROWSINESS, DIZZINESS, LOSS OF COORDINATION, AND FATIGUE). RESPIRATORY SYMPTOMS ASSOCIATED WITH PRE-EXISTING LUNG DISORDERS (E.O., ASTHMA-LIKE CONDITIONS) MAY BE AGGRAVATED BY EXPOSURE TO THIS MATERIAL.

INGESTION (SWALLOWING):

WHILE THIS MATERIAL HAS A LOW DEGREE OF TOXICITY, INGESTION OF EXCESSIVE QUANTITIES MAY CAUSE IRRITATION OF THE DIGESTIVE TRACT AND SIGNS OF NERVOUS SYSTEM DEPRESSION (E.G., DROWSINESS, DIZZINESS, LOSS OF COORDINATION, AND FATIGUE). ASPIRATION HAZARD - THIS MATERIAL CAN ENTER LUNGS DURING SWALLOWING OR VOMITING AND CAUSE LUNG INFLAMMATION AND DAMAGE.

COMMENTS:

THIS SUBSTANCE HAS NOT BEEN IDENTIFIED AS A CARCINOGEN OR PROBABLE CARCINOGEN BY NTP, IARC OR OSHA. REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE (SOMETIMES REFERRED TO AS SOLVENT OR PAINTERS' SYNDROME). INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THIS PRODUCT MAY BE HARMFUL OR FATAL.

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SECTION VII - STORAGE AND SPECIAL PRECAUTIONS

HANDLING AND STORAGE PRECAUTIONS:

KEEP CONTAINERS TIGHTLY CLOSED. KEEP CONTAINERS COOL, DRY, AND AWAY FROM SOURCES OF IGNITION. USE AND STORE THIS PRODUCT WITH ADEQUATE VENTILATION. AVOID INHALATION OF VAPORS AND PERSONAL CONTACT WITH THE PRODUCT. USE GOOD PERSONAL HYGIENE PRACTICE. "EMPTY" CONTAINERS RETAIN RESIDUE (LIQUID AND/OR VAPOR) AND CAN BE DANGEROUS. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS OR OTHER SOURCES OF IGNITION. THEY MAY EXPLODE AND CAUSE INJURY OR DEATH. "EMPTY" DRUMS SHOULD BE COMPLETELY DRAINED, PROPERLY BUNDED AND PROMPTLY SHIPPED TO THE SUPPLIER OR A DRUM RECONSTITUTIONER. ALL OTHER CONTAINERS SHOULD BE DISPOSED OF IN AN ENVIRONMENTALLY SAFE MANNER AND IN ACCORDANCE WITH GOVERNMENTAL REGULATIONS. BEFORE WORKING ON OR IN TANKS WHICH CONTAIN OR HAVE CONTAINED THIS PRODUCT, REFER TO OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION REGULATIONS, ANSI Z49.1, AND OTHER GOVERNMENTAL AND INDUSTRIAL REFERENCES PERTAINING TO CLEANING, REPAIRING, WELDING, OR OTHER CONTEMPLATED OPERATIONS.

SECTION VIII - FIRE AND EXPLOSION HAZARD DATA

HAZARD RANKING

NFPA HAZARD CLASS	HEALTH HAZARD: 1	0 = LEAST	HMIS HAZARD CLASS	HEALTH: 1
	FLAMMABILITY: 2	1 = SLIGHT		FLAM: 2
	REACTIVITY: 0	2 = MODERATE		REACT: 0
	OTHER: -	3 = HIGH		P.P.E.: -
		4 = EXTREME		

LOWER EXPLOSIVE LIMIT (% VOL.)

1.0

UPPER EXPLOSIVE LIMIT (% VOL.)

6.0

FLASH POINT

125, TCC F

EXTINGUISHING MEDIA:

EXTINGUISH WITH DRY CHEMICAL, CO2 OR FOAM.

FIRE & EXPLOSION HAZARDS:

THIS MATERIAL IS COMBUSTIBLE AND MAY BE IGNITED BY HEAT OR FLAME. THIS MATERIAL WILL BURN, BUT WILL NOT IGNITE READILY.

FIRE FIGHTING PROCEDURES:

THE USE OF A SCBA IS RECOMMENDED FOR FIRE FIGHTERS. WATER SPRAY MAY BE USEFUL IN MINIMIZING VAPORS AND COOLING CONTAINERS EXPOSED TO HEAT AND FLAME. AVOID SPREADING BURNING LIQUID WITH WATER USED FOR COOLING PURPOSES.

SECTION IX - PHYSICAL DATA

APPROX. BOILING POINT

346 TO 406 F

VAPOR DENSITY (AIR = 1)

5.2

VAPOR PRESSURE

1.2 MM HG @ 20C

EVAPORATION RATE (N-BUTYL ACETATE = 1)

0.17

X VOLATILE

100%

X SOLUBILITY IN WATER

NEGLECTIBLE (< 5%)

SPECIFIC GRAVITY (TEMP/TEMP)

0.759 (60F/60F)

APPEARANCE

CLEAR, LITTLE IF ANY COLOR

ODOR

CHARACTERISTIC

BEST AVAILABLE COPY

Product Name: ODORLESS MINERAL SPIRITS
Product Code No: 11291

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SECTION XI - DOCUMENTARY INFORMATION

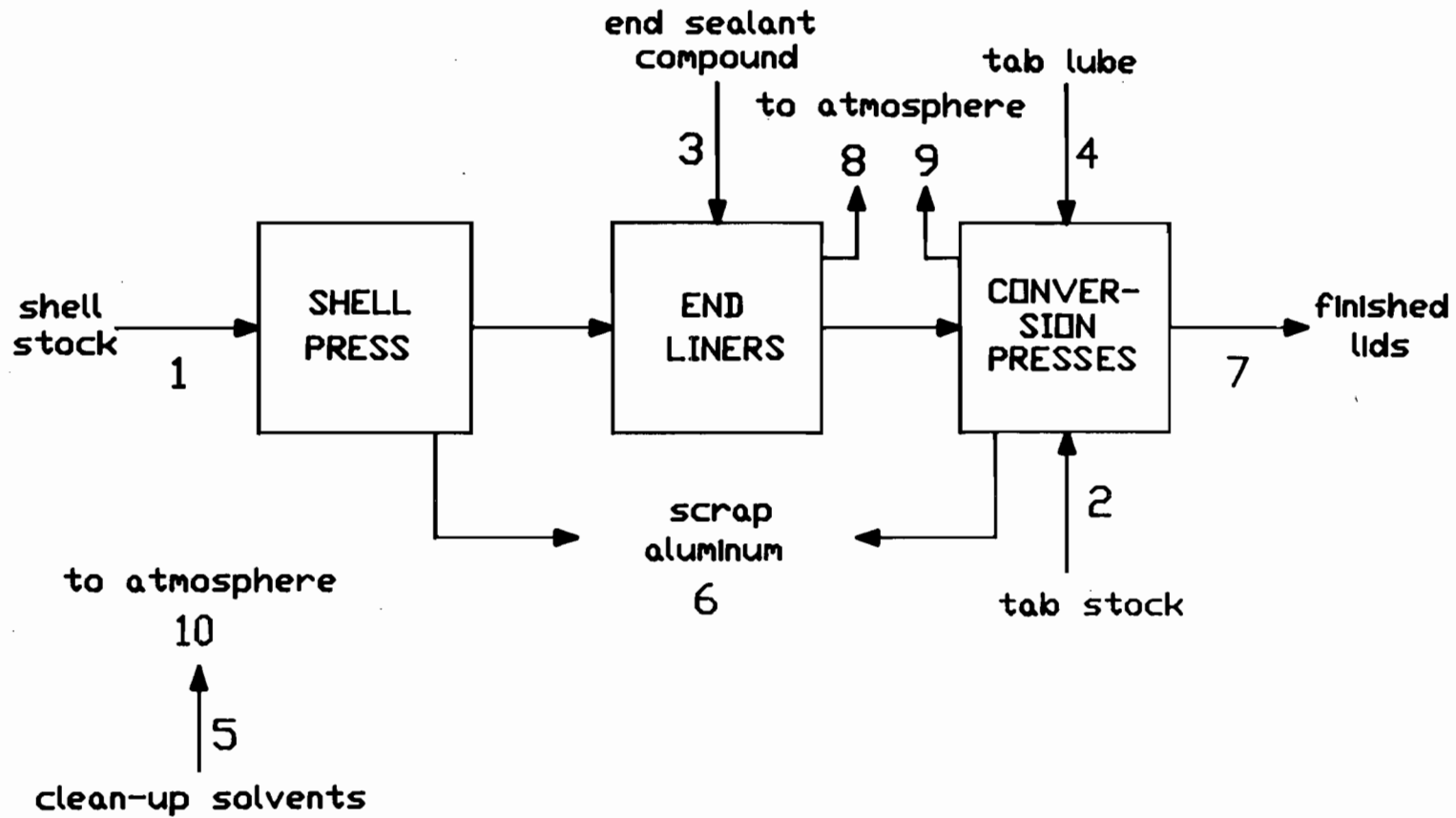
Revised 12/01/88
ISSUE DATE: 10/12/88 PRODUCT CODE NO. 11291
PREV. DATE: 7/1/88 PREV. PROD. CODE NO. 1291
MSDS NO: 6293 PREV. MSDS NO: 861

DISCLAIMER OF EXPRESSED AND IMPLIED WARRANTIES

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ATTACHMENT V.6

FLOW DIAGRAM & MATERIAL BALANCE



GAINESVILLE MODERNIZATION - FLOW DIAGRAM

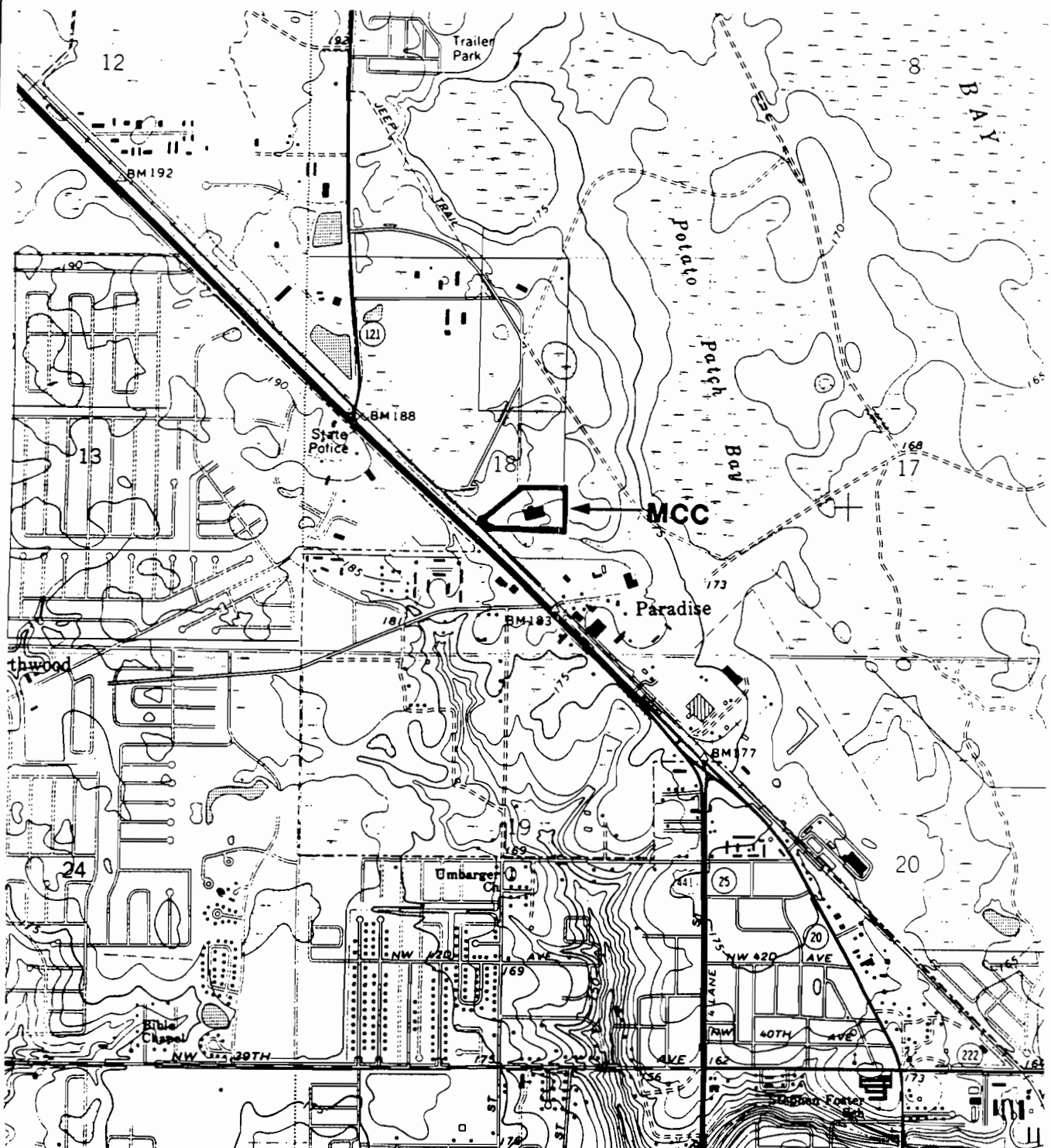
TYPICAL MODULE BASED ON SHELL PRESS - ONE OF FOUR

METAL CONTAINER CORPORATION – GAINESVILLE LID PLANT

MODERNIZATION PROJECT – MATERIAL BALANCE (ENTIRE FACILITY)

	ID No. From Flow Diagram	Hourly Maximum	Annual Average
Raw Materials Input			
aluminum (shell stock)	1	8250 pounds	83151 pounds x 1000
aluminum (tab stock)	2	1260 pounds	11198 pounds x 1000
end sealant	3	201 pounds	1563.3 pounds x 1000
tab lube	4	45.8 pounds	356.1 pounds x 1000
clean-up solvents	5	20.7 pounds	160.6 pounds x 1000
Materials Output			
scrap aluminum	6	1880 pounds	16215 pounds x 1000
finished lids	7	7030 pounds	60771 pounds x 1000
Emissions (VOC)			
end sealant	8	81.1 pounds	315.2 tons
tab lube	9	43.3 pounds	168.3 tons
clean-up solvents	10	20.7 pounds	80.3 tons

ATTACHMENT V.7
LOCATION MAP AND PLOT PLAN



SCALE 1:24 000

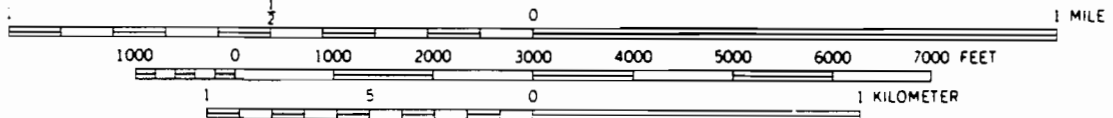


FIGURE 1-1.
 SITE LOCATION MAP
 Source: ECT, 1990.

ECT
 Environmental Consulting & Technology, Inc.

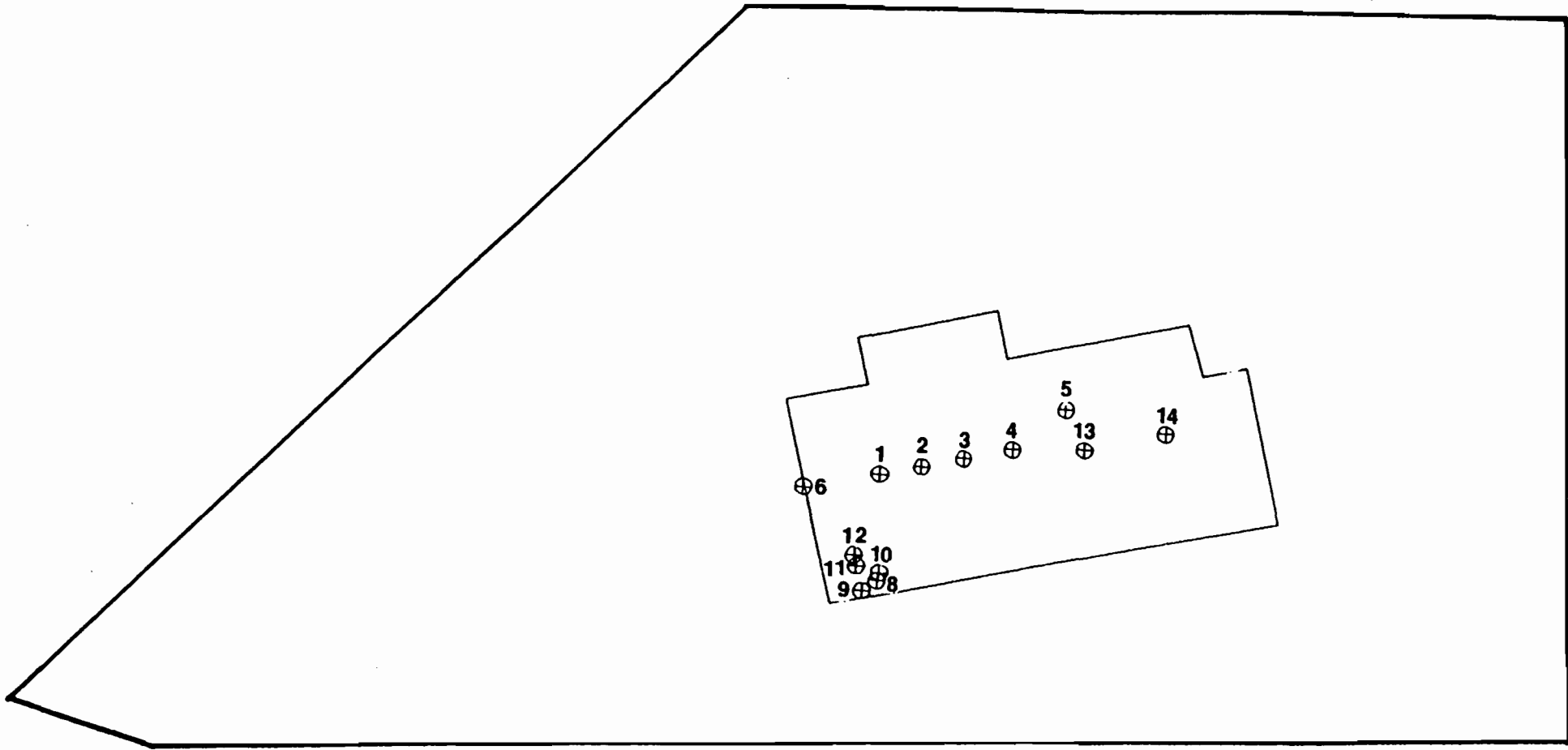


FIGURE 2-1.

FACILITY LAYOUT AND EMISSION POINT LOCATIONS

Source: ECT, 1990.

ECT

Environmental Consulting & Technology, Inc.

ATTACHMENT V.9
APPLICATION FEE



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

000265

CHECK DATE	CHECK NUMBER
8/22/90	000265

Manufacturers Hanover Bank (Delaware) 1201 Market Street Wilmington, Delaware 19801	VOID 180 DAYS AFTER ISSUANCE		62-26 311
			<div style="border: 1px solid black; padding: 2px;"> -09 2338 </div>
TO THE ORDER OF:	Florida Department of Environmental Regulation		<div style="border: 1px solid black; padding: 5px; text-align: center;"> PAY THIS AMOUNT \$ ****5,000.00**** </div>
		<i>J. P. [Signature]</i> METAL CONTAINER CORPORATION AUTHORIZED SIGNATURE	_____ AUTHORIZED SIGNATURE



ATTACHMENT V1

BEST AVAILABLE CONTROL TECHNOLOGY ANALYSIS

BEST AVAILABLE CONTROL TECHNOLOGY

Metal Container Corporation (MCC) is proposing the use of high solid/low VOC end sealant compound as Best Available Control Technology (BACT). This analysis will show, through the use of recent BACT determinations and a review of other control technologies, that high solid/low VOC end sealant compound is BACT for an aluminum lid manufacturing facility.

A thorough review of the BACT/LAER Clearinghouse Document from 1986-1989 yielded two BACT determinations for a lid manufacturing process. Both determinations (copies attached) were made for Heekin Can, Inc. in Cincinnati, Ohio.

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.

Due to advances in the formulation of end sealant compound, the formulation MCC is currently using and is proposing to use after the modernization has a VOC content of 3.2 pounds/gallon or a reduction of 14% over the most recent BACT determination.

In order to determine BACT for a specific application, the "top-down" approach is used. The technology which affords the greatest emission reduction is evaluated first, followed in descending order of control effectiveness by other technologies.

The technology MCC is proposing will be the basis for evaluation of the alternative control technologies. Two potentially viable technologies were identified:

- 1) the use of non-VOC (water-base) end sealant compound,
- 2) collection and destruction of VOC emissions through the use of thermal incineration.

These two technologies were assessed assuming application to the two new modules to be added as part of the modernization. The two existing modules which remain will continue to operate using the existing high solid/low-solvent compound as they are currently permitted.

WATER-BASE END SEALANT

There are both operational and technical difficulties associated with the use of water-base end sealant compound.

On an operational basis, water-base 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. The added capital cost of the drying ovens and the associated increase in utility costs have not proven to be cost effective.

Metal Container Corporation's experience with water-base end sealant has shown significantly lower production efficiency than with low solvent/high solids sealant due to equipment downtime from tooling build-up and high spoilage rates.

In order to meet committed production quotas from this facility, additional equipment would be required if water-base sealant was used. A liner, dryer, balancer, conversion press, counter/bagger, and conveying equipment would be the minimum additional equipment required, as well as a new additional water-base compound bulk storage and delivery system.

Table VI-1 details the emissions that would be generated by applying water-base compound on the shells produced by the two new shell presses. VOC emissions would be 150 tons per year, a reduction of 191 tons from the base case of 341 tons.

Table VI-2 presents the capital and annualized costs associated with use of a water-base compound. Total capital investment would be \$4.5 million. Annualized costs would be \$1,339,500, resulting in a cost effectiveness of \$7013 per ton of VOC removed.

With this significant economic impact coupled with the technical and operational difficulties, a water-base system is not a viable alternative for this project.

Table VI-1

METAL CONTAINER CORPORATION - GAINESVILLE LID PLANT MODERNIZATION

BACT ANALYSIS

Water-base end sealant compound on shells from Machine 1 and 2

VOC Emissions Basis

based on shell press capacity
 (assumes all shells produced are lined)
 press operating efficiency 90 %
 annual operation 360 days
 usage rates 1989 actual

Shell Press Specifications

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

Coating/Solvent Specifications

Machine 1 and 2

compound	typical mfg ident	density [lb/gal]	VOC content [wt frax]	usage rate [gal/1000lids]
end sealant	DM 8028	9.30	0	0.0174
tab lube	J-G 3810	6.35	0.945	0.0049
solvents	Amsco 1487	5.58	1	0.0023 a)
	Amsco 1241	6.32	1	0.00019

Machine 3 and 4

compound	typical mfg ident	density [lb/gal]	VOC content [wt frax]	usage rate [gal/1000lids]
end sealant	DM 2140	7.82	0.4048	0.0174
tab lube	J-G 3810	6.35	0.945	0.0049
solvents	Amsco 1487	5.58	1	0.0023 a)
	Amsco 1241	6.32	1	0.00019

Table VI-1 (cont.)

VOC Emissions (by shell press production)

	pounds/hr	tons/yr
Machine 1		
end sealant	0.0	0.0
tab lube	13.1	50.9
Amsco 1487	5.7	22.2
Amsco 1241	0.5	2.1
total	19.4	75.2
Machine 2		
end sealant	0.0	0.0
tab lube	13.1	50.9
Amsco 1487	5.7	22.2
Amsco 1241	0.5	2.1
total	19.4	75.2
Machine 3		
end sealant	21.8	84.8
tab lube	11.6	45.3
Amsco 1487	5.1	19.8
Amsco 1241	0.5	1.8
total	39.0	151.7
Machine 4		
end sealant	10.2	39.6
tab lube	5.4	21.1
Amsco 1487	2.4	9.2
Amsco 1241	0.2	0.9
total	18.2	70.8
Entire Facility		
end sealant	32.0	124.4
tab lube	43.3	168.3
Amsco 1487	18.9	73.4
Amsco 1241	1.8	6.9
total	95.9	373.0

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

THERMAL INCINERATION

While the use of thermal incineration has been used to meet Lowest Achievable Emission Rate (LAER) in nonattainment areas at can manufacturing facilities, it has not been applied to the lid manufacturing process. Emission reductions are achieved through this method by capturing and ducting the VOCs which are "flashed-off" during the manufacturing process to an incinerator.

While the lid manufacturing process does not easily lend itself to the capture of VOC, the largest reductions could be achieved by ducting the scrap cyclones (VOC from tab lube) and the end liners and balancers (VOC from end sealant) to a regenerative natural gas-fired thermal oxidizer. Due to the nature of the compounds used and the speed at which the ends pass through the liners, it is estimated that 65% of the VOC from these materials can be captured and ducted to a thermal oxidizer with a 90% destruction efficiency. Table VI-3 summarizes emissions resulting from the thermal oxidation of the emissions from equipment associated with the two new presses. Emissions of VOC would be reduced to 170 tons per year, a reduction of 171 tons from the base case of 341 tons.

Data on the thermal oxidizer are presented in Table VI-4. The cost for these controls are high, as shown in the cost analysis represented in Table VI-5. Capital costs of a thermal oxidizer system would be \$1.8 million, with annualized costs of \$774,700. The resulting cost effectiveness of such a system would be \$4560 per ton of VOC removed.

SUMMARY OF BACT ANALYSIS

Table VI-6 summarizes the cost-effectiveness of the two alternate technologies compared to the technology MCC is proposing as BACT. Comparison of the economics and technical viability of the alternate technologies, and review of recent BACT/LAER determinations shows that the use of high solids/low VOC compounds is BACT for the proposed lid plant modernization.

Table VI-3

METAL CONTAINER CORPORATION - GAINESVILLE LID PLANT MODERNIZATION

BACT ANALYSIS

Thermal Oxidizer - 65% capture efficiency, 90% destruction efficiency on equipment associated with Machine 1 and 2

VOC Emissions Basis

based on shell press capacity
 (assumes all shells produced are lined)
 press operating efficiency 90 %
 annual operation 360 days
 usage rates 1989 actual

Shell Press Specifications

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

Coating/Solvent Specifications

compound	typical mfg ident	density [lb/gal]	VOC content [wt frax]	usage rate [gal/1000lids]
end sealant	DM 2140	7.82	0.4048	0.0174
tab lube	J-G 3810	6.35	0.945	0.0049
solvents	Amsco 1487	5.58	1	0.0023 a)
	Amsco 1241	6.32	1	0.00019

VOC Emissions (by shell press production)

	pounds/hr	tons/yr
Machine 1		
end sealant	10.2	39.6
tab lube	5.4	21.1
Amsco 1487	5.7	22.2
Amsco 1241	0.5	2.1
total	21.9	85.0

Table VI-3 (cont.)

Machine 2		
end sealant	10.2	39.6
tab lube	5.4	21.1
Amsco 1487	5.7	22.2
Amsco 1241	0.5	2.1
total	21.9	85.0
Machine 3		
end sealant	21.8	84.8
tab lube	11.6	45.3
Amsco 1487	5.1	19.8
Amsco 1241	0.5	1.8
total	39.0	151.7
Machine 4		
end sealant	10.2	39.6
tab lube	5.4	21.1
Amsco 1487	2.4	9.2
Amsco 1241	0.2	0.9
total	18.2	70.8
Entire Facility		
end sealant	52.4	203.6
tab lube	28.0	108.7
Amsco 1487	18.9	73.4
Amsco 1241	1.8	6.9
total	101.0	392.5

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

Table VI-2

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

CAPITAL COSTS

DIRECT COSTS (1990 \$)

PURCHASED EQUIPMENT COST

TANKAGE AND PIPING	33,900
AUXILIARY EQUIPMENT	1,927,400
IN-LINE DRYERS	250,000

EQUIPMENT COST (EC)	2,211,300
---------------------	-----------

INSTRUMENTS & CONTROLS (0.1EC)	221,130
--------------------------------	---------

TAXES (0.06EC)	132,678
----------------	---------

FREIGHT (0.05EC)	110,565
------------------	---------

PURCHASED EQUIPMENT COST (PEC)	2,675,673
--------------------------------	-----------

DIRECT INSTALLATION COST

FOUNDATIONS AND SUPPORTS (0.08PEC)	214,054
------------------------------------	---------

ERECTION AND HANDLING (0.14PEC)	374,594
---------------------------------	---------

ELECTRICAL (0.04PEC)	107,027
----------------------	---------

PIPING (0.02PEC)	0
------------------	---

INSULATION (0.01PEC)	26,757
----------------------	--------

PAINTING (0.01PEC)	26,757
--------------------	--------

SITE PREPARATION	0
------------------	---

BUILDINGS	0
-----------	---

DIRECT INSTALLATION COST (DIC)	749,188
--------------------------------	---------

TOTAL DIRECT COST (DC)	3,424,861
------------------------	-----------

INDIRECT COSTS

ENGINEERING AND SUPERVISION (0.10PEC)	267,567
---------------------------------------	---------

CONSTRUCTION AND FIELD EXPENSES (0.05PEC)	133,784
---	---------

CONSTRUCTION FEE (INCLUDED IN DC)	0
-----------------------------------	---

START-UP (0.02PEC)	53,513
--------------------	--------

PERFORMANCE TEST (0.01PEC)	26,757
----------------------------	--------

CONSTRUCTION CONTINGENCY (0.15DIC)	112,378
------------------------------------	---------

EQUIPMENT CONTINGENCY (0.15PEC)	401,351
---------------------------------	---------

ENGINEERING CONTINGENCY (0.15(0.10PEC))	40,135
---	--------

TOTAL INDIRECT COSTS (IC)	1,035,485
---------------------------	-----------

TOTAL CAPITAL INVESTMENT (TCI) = (DC+IC)	\$ 4,460,347
--	--------------

Table VI-2 (cont.)

GAINESVILLE LID PLANT MODERNIZATION
WATER-BASE END SEALANT COST ANALYSIS

page 2

ANNUAL COSTS (1990 \$)

COST DATA

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

DIRECT ANNUAL COSTS

ANNUAL ELECTRICAL USAGE		59,875
WATER-BASE END SEALANT	1,156,976	
PROPOSED END SEALANT	845,216	
	DIFFERENTIAL	311,760

DIRECT ANNUAL COST (DAC)		371,635

INDIRECT ANNUAL COSTS

CAPITAL RECOVERY (CRF x TCI)		789,411
ADMINISTRATIVE CHARGES (0.02TCI)		89,207
PROPERTY TAX (0.01TCI)		44,603
INSURANCE (0.01TCI)		44,603

INDIRECT ANNUAL COST (IAC)		967,825

TOTAL ANNUALIZED COST (DAC+IAC) \$ 1,339,460

EMISSION REDUCTION

EMISSIONS WITH BACT (TONS/YEAR)	341
EMISSIONS USING WATER-BASE END SEALANT (TONS/YEAR)	150
NET REDUCTION (TONS/YEAR)	191

COST EFFECTIVENESS (\$/TON OF VOC REMOVED) \$ 7,013

Data Sources

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

Table VI-4

GAINESVILLE LID PLANT MODERNIZATION
THERMAL OXIDIZER DATA SHEET

SPECIFICATIONS

TYPE	Thermal
SIZE (SCFM)	22,000
HEAT INPUT (MMBTU/HR)	7.15
BLOWER SIZE (H.P.)	275
COST	700,000
NUMBER REQUIRED	1
TOTAL COST	700,000
AUXILIARY EQUIPMENT (PER T.O.)	151,000
NATURAL GAS PIPELINE	250,000

CAPITAL RECOVERY

ELECTRIC CHARGE (\$/KW-HR)	0.066
GAS CHARGE (\$/MMBTU)	4.20
INTEREST (%)	0.12
USEFUL LIFE (YEARS)	10
FACTOR	0.1770

EMISSIONS REDUCTION

EMISSIONS WITH BACT (TONS/YEAR)	341
EMISSIONS USING THERMAL OXIDIZER (TONS/YEAR)	170
NET REDUCTION (TONS/YEAR)	171

Table VI-5

**GAINESVILLE LID PLANT MODERNIZATION
THERMAL OXIDIZER COST ANALYSIS**

CAPITAL COSTS

DIRECT COSTS (1990 \$)

PURCHASED EQUIPMENT COST

INCINERATOR	700,000
AUXILIARY EQUIPMENT	45,000

EQUIPMENT COST (EC)	745,000
---------------------	---------

INSTRUMENTS & CONTROLS (0.1EC)	74,500
--------------------------------	--------

TAXES (0.06EC)	44,700
----------------	--------

FREIGHT (0.05EC)	37,250
------------------	--------

PURCHASED EQUIPMENT COST (PEC)	901,450
--------------------------------	---------

DIRECT INSTALLATION COST

FOUNDATIONS AND SUPPORTS (0.08PEC)	72,116
------------------------------------	--------

ERECTION AND HANDLING (0.14PEC)	126,203
---------------------------------	---------

ELECTRICAL (0.10PEC)	90,145
----------------------	--------

PIPING (0.02PEC)	18,029
------------------	--------

INSULATION (0.01PEC)	9,015
----------------------	-------

PAINTING (0.01PEC)	9,015
--------------------	-------

SITE PREPARATION	0
------------------	---

DIRECT INSTALLATION COST (DIC)	324,522
--------------------------------	---------

GAS PIPELINE (INSTALLED)	250,000
--------------------------	---------

TOTAL DIRECT COST (DC)	1,475,972
------------------------	-----------

INDIRECT COSTS

ENGINEERING AND SUPERVISION (0.10PEC)	90,145
---------------------------------------	--------

CONSTRUCTION AND FIELD EXPENSES (0.05PEC)	45,073
---	--------

CONSTRUCTION FEE (INCLUDED IN DC)	0
-----------------------------------	---

START-UP (0.02PEC)	18,029
--------------------	--------

PERFORMANCE TEST (0.01PEC)	9,015
----------------------------	-------

CONSTRUCTION CONTINGENCY (0.15DIC)	48,678
------------------------------------	--------

EQUIPMENT CONTINGENCY (0.15PEC)	135,218
---------------------------------	---------

ENGINEERING CONTINGENCY (0.15(0.10PEC))	13,522
---	--------

TOTAL INDIRECT COSTS (IC)	359,679
---------------------------	---------

TOTAL CAPITAL INVESTMENT (TCI) = (DC+IC)	\$ 1,835,651
--	--------------

Table VI-5 (cont.)

GAINESVILLE LID PLANT MODERNIZATION
THERMAL OXIDIZER COST ANALYSIS

page 2

ANNUAL COSTS (1990 \$)

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	116,949
ANNUAL GAS USAGE	259,459

DIRECT ANNUAL COST (DAC) 376,408

INDIRECT ANNUAL COSTS

CAPITAL RECOVERY (CRF x TCI)	324,881
ADMINISTRATIVE CHARGES (0.02TCI)	36,713
PROPERTY TAX (0.01TCI)	18,357
INSURANCE (0.01TCI)	18,357

INDIRECT ANNUAL COST (IAC) 398,307

TOTAL ANNUALIZED COST (DAC+IAC) \$ 774,715

EMISSION REDUCTION

EMISSIONS WITH BACT (TONS/YEAR)	341
EMISSIONS USING THERMAL OXIDIZER (TONS/YEAR)	171
NET REDUCTION (TONS/YEAR)	170

COST EFFECTIVENESS (\$/TON OF VOC REMOVED) \$ 4,557

Data Sources

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

Table VI-6

METAL CONTAINER CORPORATION
GAINESVILLE MODERNIZATION
COST SUMMARY

<u>Control Scenario</u>	<u>Controlled Emissions</u> (tons/year)	<u>Capital Investment (a)</u> (\$)	<u>Annualized Cost (a)</u> (\$)	<u>Cost Effectiveness</u> (\$/ton removed)
Water-base end sealant	150	4,460,347	1,339,460	7,013
Capture and incineration	171	1,835,651	774,715	4,557
Low solvent/ high solids	341	Baseline	Baseline	Baseline

(a) In excess of baseline scenario.

PREVIOUS BACT DETERMINATIONS

(*) INDICATES DATUM WAS TRUNCATED FOR THIS TABLE.

ID NUMBER OH-0081A

SOURCE TYPE CODE

APPENDIX -- DETAILED SOURCE LISTING

06/23/1988

SOURCE TYPE/SIZE SURFACE COATING - CANS/COILS 1051.00 M/CANS/YR

COMPANY NAME/SITE LOCATION HEekin CAN, INC. CINCINNATI, OH
6200 BROADWELL RD.

DETERMINATION IS BACT FOR A NEW SOURCE. DATE OF PERMIT ISSUANCE-- 01/21/88
PERMIT NO. 14-1464 ESTIMATED DATE OF START-UP-- 1988
DETERMINATION MADE BY SOUTHWESTERN OHIO APCA JIM SADELFELD (513)-251-8777
(AGENCY) (AGENCY CONTACT PERSON) (PHONE)

PROCESSES SUBJECT TO THIS PERMIT	THROUGHPUT CAPACITY	POLLUTANT EMITTED	EMISSION LIMITS CONTROL EQUIPMENT OR PROCESS MODIFICATION	... & BASIS ... PCT EFF
APPLICATOR, COATER, END SEAL	50.00 M/CAN ENDS/M	VOC	3.7000 LB/GAL MINUS H2O LOW SOLVENT COATINGS	BACT

329

(*) INDICATES DATUM WAS TRUNCATED FOR THIS TABLE.

ATTACHMENT VII.A

AMBIENT OZONE MONITORING DATA

AMBIENT MONITORING DATA

The modernization project will result in a net increase of over 100 tons per year of volatile organic compounds. As such, the existing ambient ozone level must be quantified per Florida Air Pollution Rule 17-2.500(50(f)).

The Florida Electric Power Coordinating Group, as part of the Florida Acid Deposition Monitoring Program, has collected continuous ozone measurements in Gainesville. The location of the monitoring site is shown in Figure VII.A-1.

A summary of the data gathered in 1988 is presented in Table VII.A-1. These data indicate that ambient levels of ozone in the Gainesville area are well below the ambient one-hour standard of 120 ppb. The maximum measured hourly concentration was 92 ppb. Figure VII.A-2 graphically illustrates the area's compliance with the standard.

ALACHUA COUNTY



Barnett Bank of Alachua County, N.A.

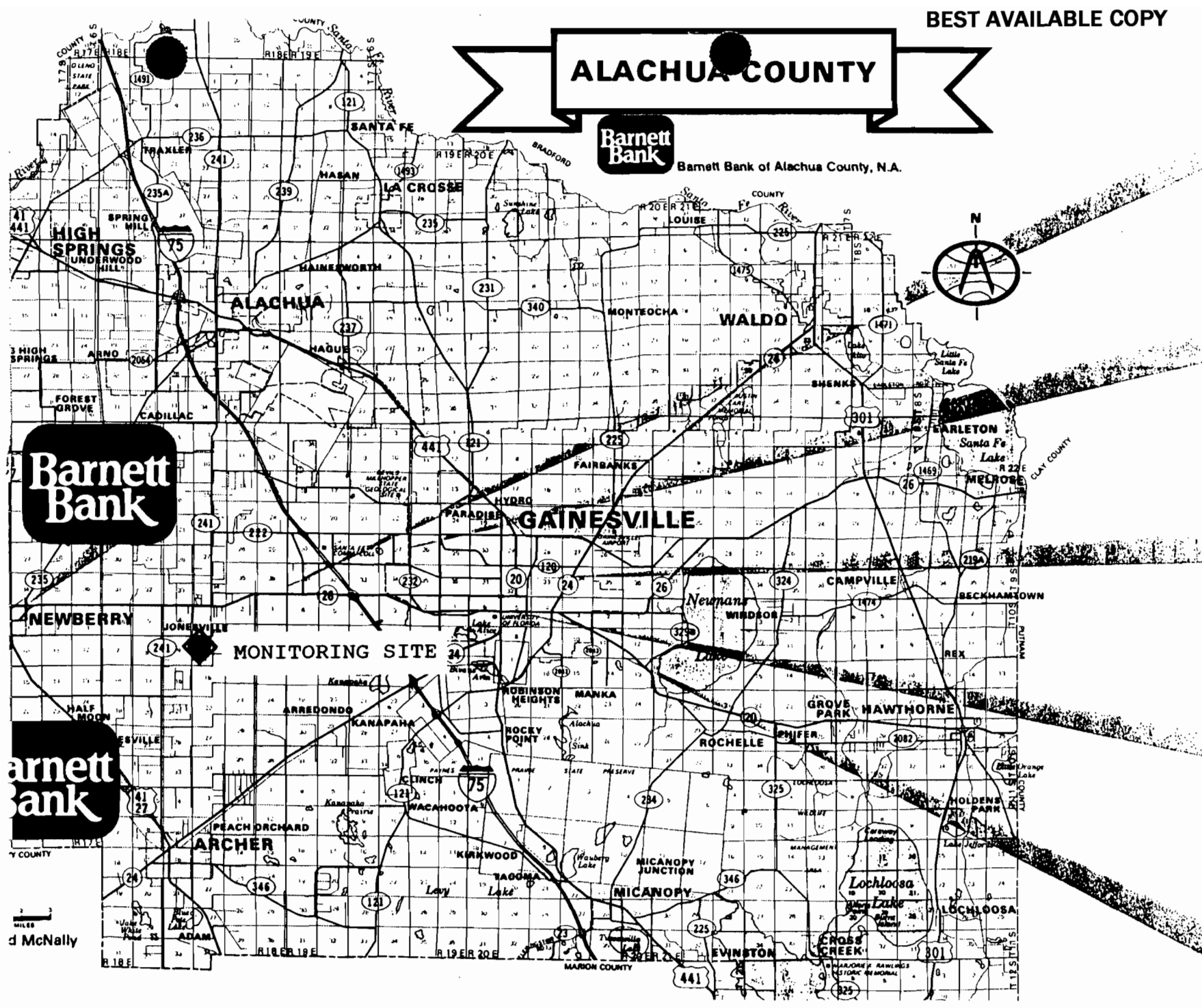


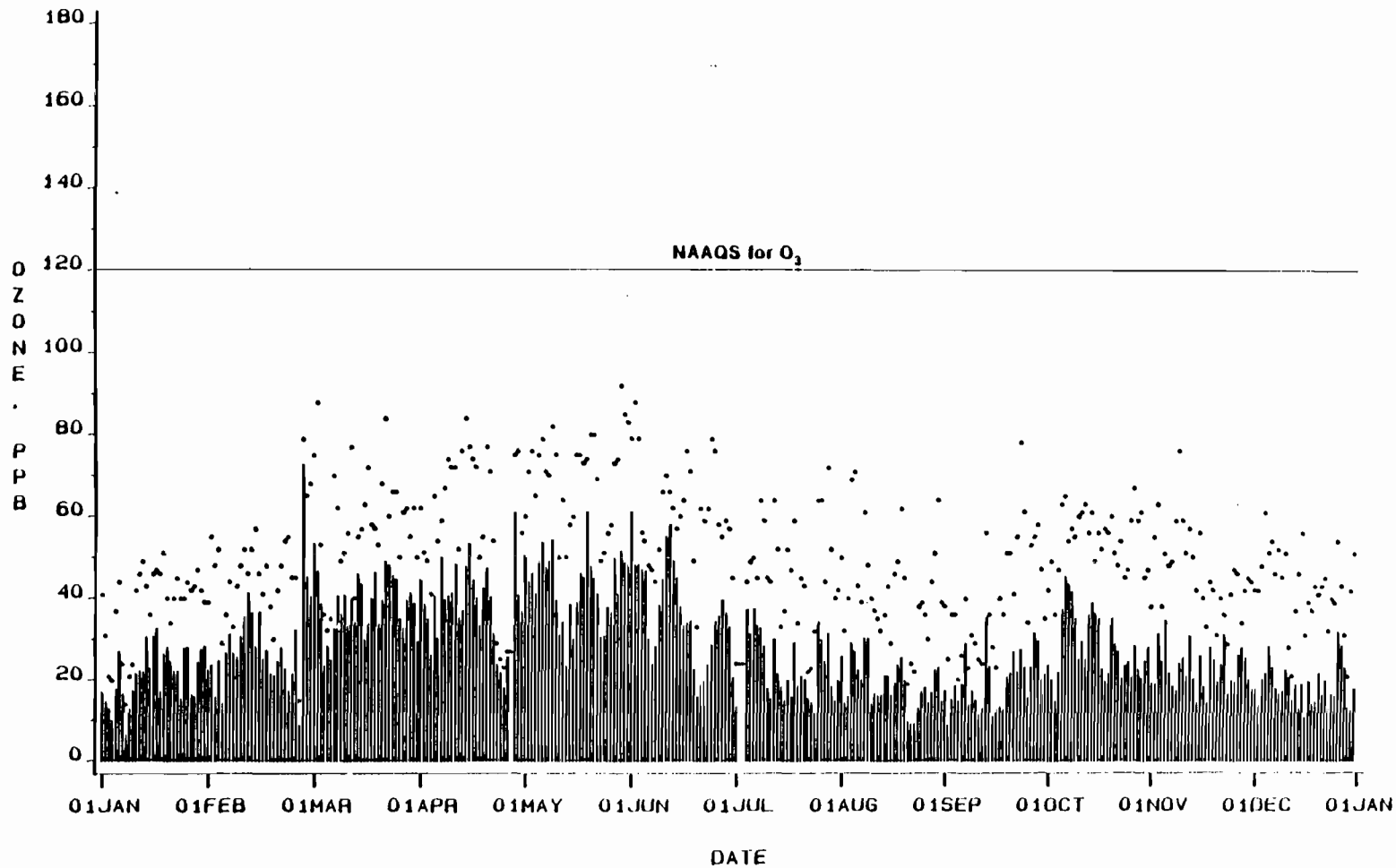
FIGURE VII.A-1. LOCATION OF AMBIENT OZONE MONITORING STATION

Table VII.A-1. 1988 Monthly Ozone Data From Gainesville

Month	Monthly Average Concentration (ppb)	Standard Deviation	Hourly Concentration (ppb)		Hour*/Date of Peak 1-Hour Concentration	Maximum Daily Average Concentration (ppb)	Data Capture (%)
			Minimum	Maximum			
1	21.5	12.9	0	51	1400/19	33	99
2	28.6	16.9	0	79	1600/27	45	93
3	38.5	17.9	0	88	1700/2	53	99
4	38.7	19.9	2	84	1800/14	53	92
5	43.2	23.5	0	92	1700/29	61	99
6	36.6	21.0	0	88	1400/2	61	99
7	23.5	17.6	0	72	1600/28	38	87
8	19.3	15.5	0	71	1100/5	30	99
9	19.6	14.7	0	78	1200/23	35	99
10	28.4	18.8	0	67	1600/27	45	99
11	23.0	15.9	0	76	1400/9	35	98
12	18.8	15.3	0	61	1400/4	32	99

*Beginning of hour.

Source: Hunter/ESE, 1989.



Note: Solid line represents 24-hour average concentrations, the dots represent peak 1-hour concentrations.

Figure VII.A-2
TIME SERIES OF DAILY AVERAGE AND PEAK HOURLY O₃ CONCENTRATIONS —
GAINESVILLE (FADMP SITE 5)

SOURCE: HUNTER/ESE, 1989.

HUNTER/ESE

ATTACHMENT VIII

**POTENTIAL TOXIC EMISSIONS ESTIMATES
AND IMPACT ASSESSMENT**

TOXIC EMISSIONS ESTIMATES

Estimates of emissions of potential air toxics from the use of low solvent compounds at the Gainesville facility are shown in Table VIII-1. The estimates are based on maximum hourly and annual average production rates, 1989 usage rates at the facility, and compound composition information provided by the manufacturer.

IMPACT ASSESSMENT

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

Table VIII-2 summarizes the maximum predicted off-property impacts of each pollutant compared to the no-threat levels. With the exception of the 24-hour n-hexane impact, all predicted impacts are well below the applicable no-threat levels. The 24-hour no-threat level for n-hexane was predicted to be exceeded by less than three percent in nine non-residential areas. The probability of these impacts occurring is less than 0.1 percent. Therefore, emissions from the facility will not pose a threat to public health.

Table VIII-1

METAL CONTAINER CORPORATION – GAINESVILLE LID PLANT
MODERNIZATION PROJECT

POTENTIAL TOXIC EMISSIONS

Basis of Estimates

production	24530 lids/min;	11.445 billion lids/yr		
	<u>density</u>	<u>usage rate</u>	<u>chemical</u>	<u>wt fraction</u>
	[lb/gal]	[gal/1000 lids]		
end sealant	7.82	0.0174	n-hexane	13
			n-heptane	3
			cyclohexane	2
			cyclohexylmethane	1
Amsco 1487	5.58	0.0023	n-hexane	53
			cyclohexane	1
			cyclohexylmethane	5

Emissions

	<u>pounds/hr</u>	<u>tons/yr</u>
n-hexane	35.9	139.5
n-heptane	6.0	23.3
cyclohexane	4.2	16.3
cyclohexylmethane	2.9	11.4

TABLE VIII-2

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

<u>POLLUTANT</u>	<u>MAXIMUM IMPACT</u> (ug/m ³)		<u>NO-THREAT LEVELS</u> (ug/m ³)	
	<u>8 HOUR</u>	<u>24-HOUR</u>	<u>8-HOUR</u>	<u>24-HOUR</u>
n-hexane	782	442	1,800	430
n-heptane	130	74	32,000	15,238
cyclohexane	91	52	1,000	238
cyclohexylmethane	63	36	32,000	7,619

*Florida Air Toxic Working Group

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

Prepared for:

**ANHEUSER-BUSCH COMPANIES, INC.
St. Louis Missouri**

Prepared by:

ECT

Environmental Consulting & Technology, Inc.

Gainesville, Florida

90-100-0100

July 27, 1990

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3.0	MODELING APPROACH	7
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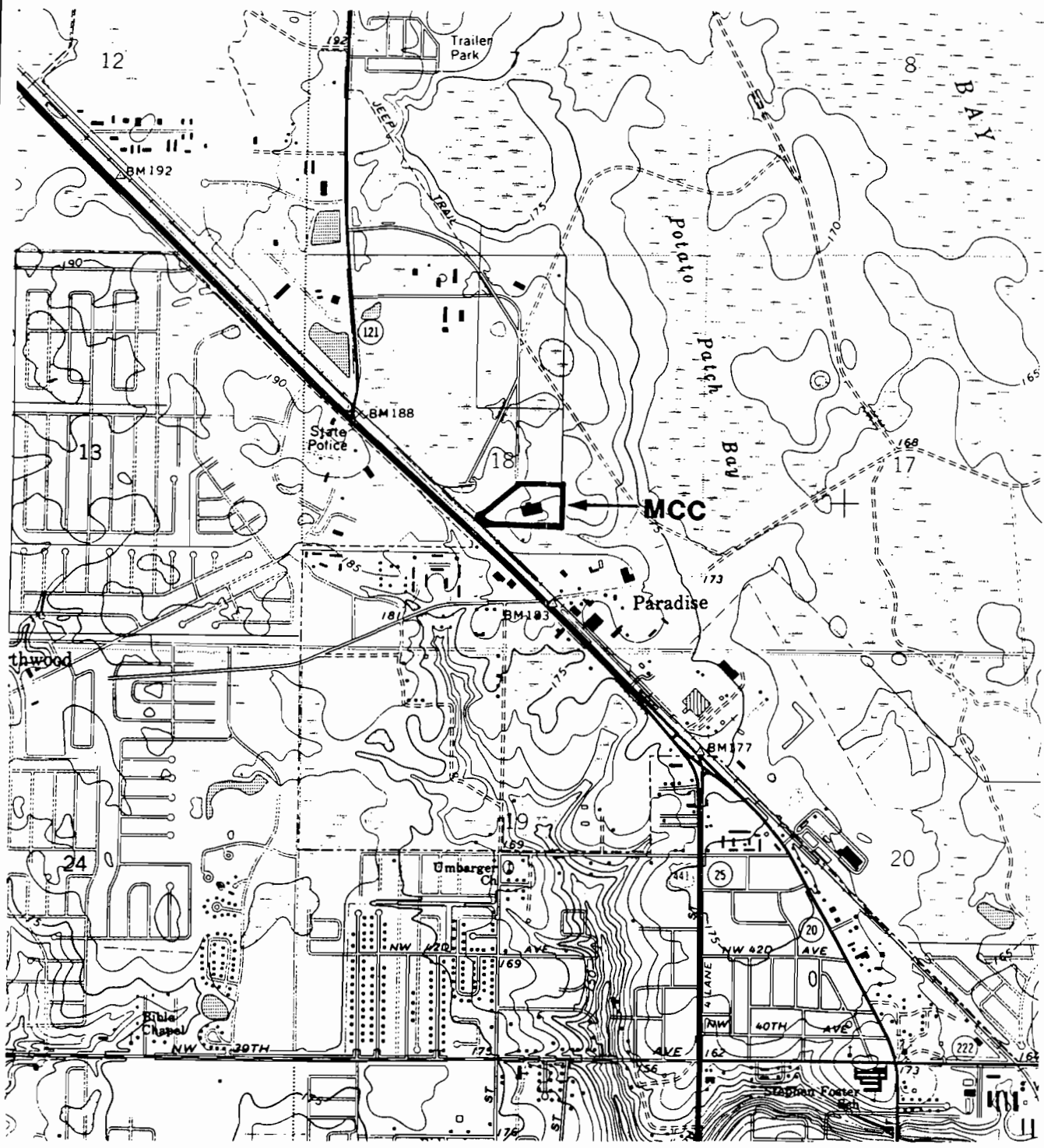
1.0 INTRODUCTION AND SUMMARY

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

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

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

The modeling study was performed using emission inputs that are described in Section 2.0 of this report. Maximum potential n-hexane emissions were used. The model and modeling methodologies used were those typically used by FDER. They are described in Section 3.0. The results, summarized in Section 4.0, showed that the facility will not pose a threat to public health. Two values that exceeded the Florida Department of Environmental Regulation (FDER) "no-threat level" for n-hexane by less than 3 percent were calculated, but, given the conservative nature of the modeling inputs, n-hexane concentrations above the no-threat level would not be expected in reality. These two potential impacts would be expected to



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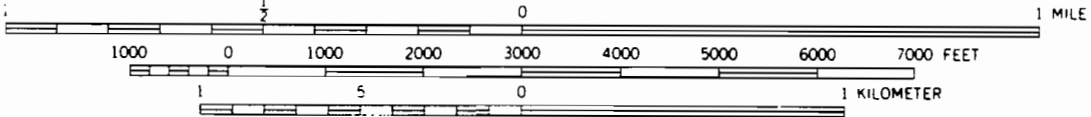


FIGURE 1-1.

SITE LOCATION MAP

Source: ECT, 1990.

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occur less than 0.1 percent of the time. Furthermore, the two exceedances were predicted to occur in close proximity to the facility, at locations zoned for non-residential uses.

2.0 FACILITY LAYOUT AND EMISSION PARAMETERS

The layout of the expanded facility is provided in Figure 2-1. Also shown are the locations of all stacks, vents, or exhausts from which n-hexane will be emitted. Emission points numbered 10-14 will be added as a direct result of the expansion project. At the same time, the other vents will be modified to improve dispersion characteristics. The modifications involve raising stack heights by 15 feet (ft) for Sources 1-4 and 10 ft for Sources, 5, 8, and 9, and changing exhaust orientations from horizontal to vertical.

Due to their operating characteristics, the three scrap cyclones (Sources 10, 11, and 12) must have rain caps. Accordingly, they were modeled with no vertical momentum. The cyclone outlets were raised 10 ft above the roof to improve dispersion characteristics and reduce their impact.

Table 2-1 summarizes stack parameters and emission rates used in the modeling. Rates of n-hexane emissions from each individual vent or exhaust were calculated in proportion to exhaust flow rate. Total facility emissions of n-hexane, with the expansion, are projected to be 36 lb/hr (maximum), based on manufacturer's data on the solvents and end sealants. (Note that Source No. 7 is not used.)

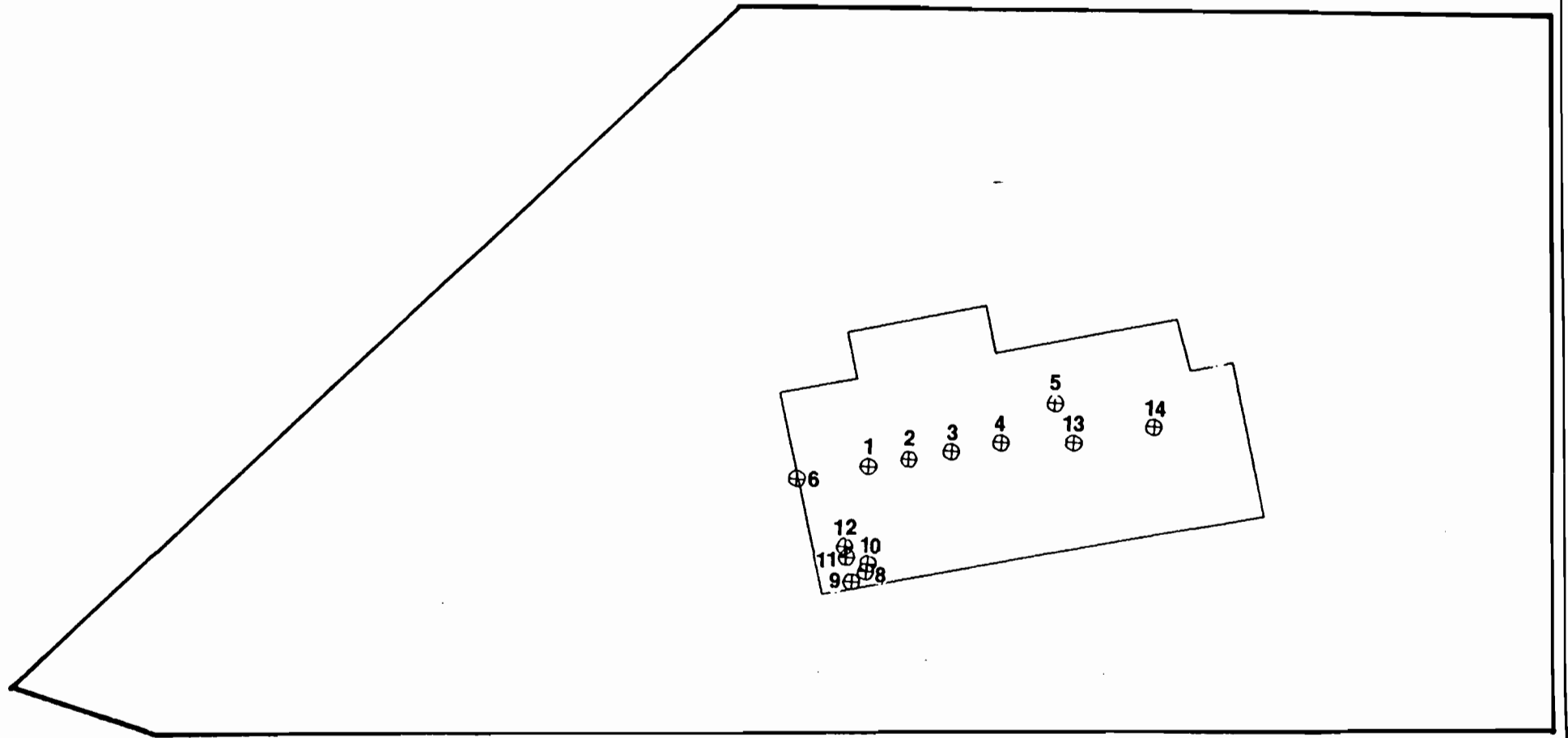


FIGURE 2-1.

FACILITY LAYOUT AND EMISSION POINT LOCATIONS

Source: ECT, 1990.



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

Source No.	Exhaust Flow (acfm)	Emission Rate		Stack Ht.		Exhaust Temp.		Exit Vel.		Stack Diameter	
		lb/hr	g/sec	ft	m	°F	°K	ft/sec	m/sec	in	m
1	10,750	3.42	0.43	41.7	12.7	80	300	41.9	12.8	28	0.71
2	10,750	3.42	0.43	41.7	12.7	80	300	41.9	12.8	28	0.71
3	10,750	3.42	0.43	41.7	12.7	80	300	41.9	12.8	28	0.71
4	10,750	3.42	0.43	41.7	12.7	80	300	41.9	12.8	28	0.71
5	21,450	6.83	0.86	36.7	11.2	80	300	83.6	25.5	28	0.71
6	6,000	1.91	0.24	26.7	8.13	80	300	--	0.01*	--	1.0*
8	5,900	1.88	0.24	36.7	11.2	80	300	55.6	17.0	18	0.46
9	6,750	2.15	0.27	36.7	11.2	80	300	63.7	19.4	18	0.46
10	6,000	1.91	0.24	36.7	11.2	80	300	--	0.01*	--	1.0*
11	7,000	2.23	0.28	36.7	11.2	80	300	--	0.01*	--	1.0*
12	7,000	2.23	0.28	36.7	11.2	80	300	--	0.01*	--	1.0*
13	5,000	1.59	0.20	36.7	11.2	80	300	19.5	5.9	28	0.71
14	5,000	1.59	0.20	36.7	11.2	80	300	19.5	5.9	28	0.71

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

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

3.0 MODELING APPROACH

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

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

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

All of the stacks and vents have heights less than 2.5 times the height of the building. Following EPA (1987) guidance, it was determined that direction-specific downwash parameters would apply to some stacks. Figure 3-2 illustrates that all of the stacks will fall within the potential zone of influence of the manufacturing building. Downwash parameters were calculated with the aid of the "GEP" program (BEE, undated).

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

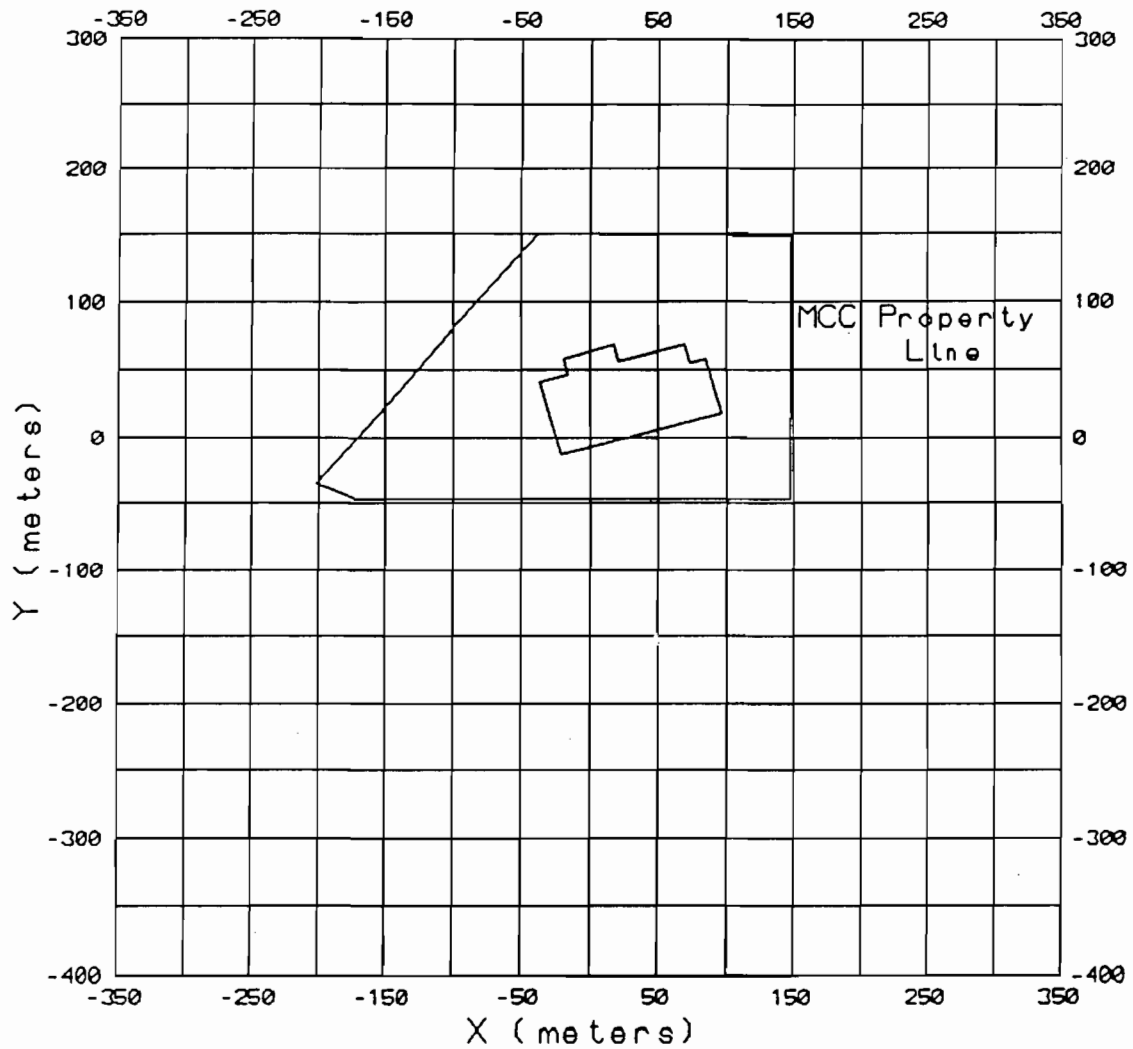


FIGURE 3-1.

MODELING RECEPTOR GRID

Source: ECT, 1990.



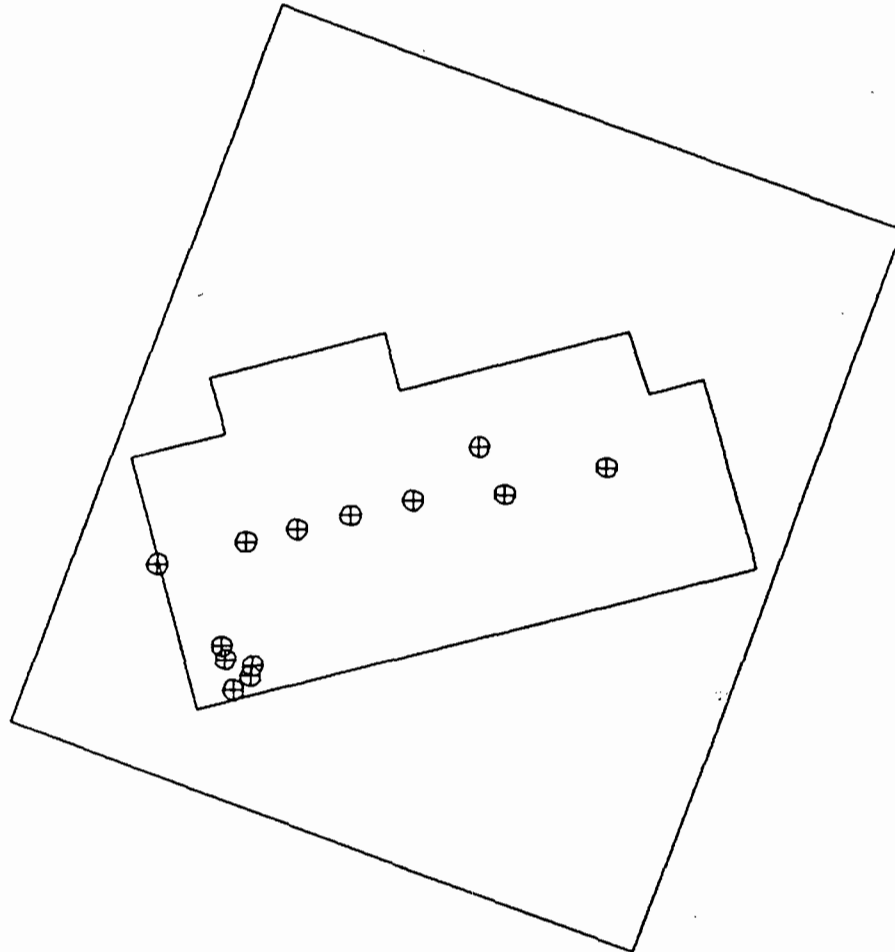


FIGURE 3-2.

DOWNWASH ZONE OF INFLUENCE (ILLUSTRATED
WITH 20-DEGREE WIND DIRECTION)

Source: ECT, 1990.

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4.0 MODELING RESULTS

The results of the modeling study are summarized in Tables 4-1 and 4-2. (A diskette containing copies of the ISCST input and output files is appended to this report.) Table 4-1 lists the top five off-property 8-hour n-hexane concentrations, while Table 4-2 lists the top five off-property 24-hour concentrations. As shown, all of the top five 8-hour impacts were found to be less than half the no-threat level, which is $1,800 \mu\text{g}/\text{m}^3$. In addition, all occurred within close proximity to the facility, in an area normally not occupied by potential human receptors. Figure 4-1 illustrates.

Two 24-hour concentrations slightly above the no-threat level ($430 \mu\text{g}/\text{m}^3$) were found, as given in Table 4-2. However, the locations of these values are in areas containing no sensitive receptors, as shown in Figure 4-2. The highest impact ($441.6 \mu\text{g}/\text{m}^3$) was predicted to occur on a parcel of land zoned non-residential. The next highest impact ($437.9 \mu\text{g}/\text{m}^3$) occurred within a railroad right-of-way.

Furthermore, the true likelihood of the occurrence of 24-hour impacts exceeding the no-threat level is quite small. Specifically, the total plant emission rate of 36 lb/hr, which was the basis for model inputs, assumes that all four shell presses are running at 100 percent efficiency (i.e., 100 percent of design capacity) over a full 24-hour period. In reality, each press is down roughly 15 percent of the time, one at a time. Therefore, 60 percent of the time only three presses would typically be in operation at the same time (i.e., all four presses in operation simultaneously would be expected only 40 percent of the time). In addition, of that 40 percent of the time, all presses operating at 100 percent efficiency would be expected no more than 25 percent of the time. All together, the worst-case emissions scenario would therefore be expected only 10 percent of the time (25 percent of 40 percent). Combined with the chance of worst-case meteorology (2 days out of 365), the total likelihood of an exceedance of the 24-hour no-threat level is less than 0.1 percent.

Table 4-1. Top 5 Off-Property N-Hexane Concentrations: 8-Hour Averaging Time

Rank	Concentration ($\mu\text{g}/\text{m}^3$)	Receptor Location (m)*		Day	Period
		X	Y		
1	781.2	50	-50	141	3
2	637.6	0	-50	299	1
3	634.0	50	-50	65	3
4	614.2	50	-100	298	3
5	586.9	50	-50	75	3

*See Figure 3-1.

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

Source: ECT, 1990.

Table 4-2. Top 5 Off-Property N-Hexane Concentrations: 24-Hour Averaging Time

Rank	Concentration ($\mu\text{g}/\text{m}^3$)	Receptor Location (m)*		Day
		X	Y	
1	441.6	-50	-100	356
2	437.9	-50	-200	305
3	420.5	-50	-100	348
4	404.2	-50	-250	305
5	402.8	-50	-150	305

*See Figure 3-1.

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

Source: ECT, 1990.

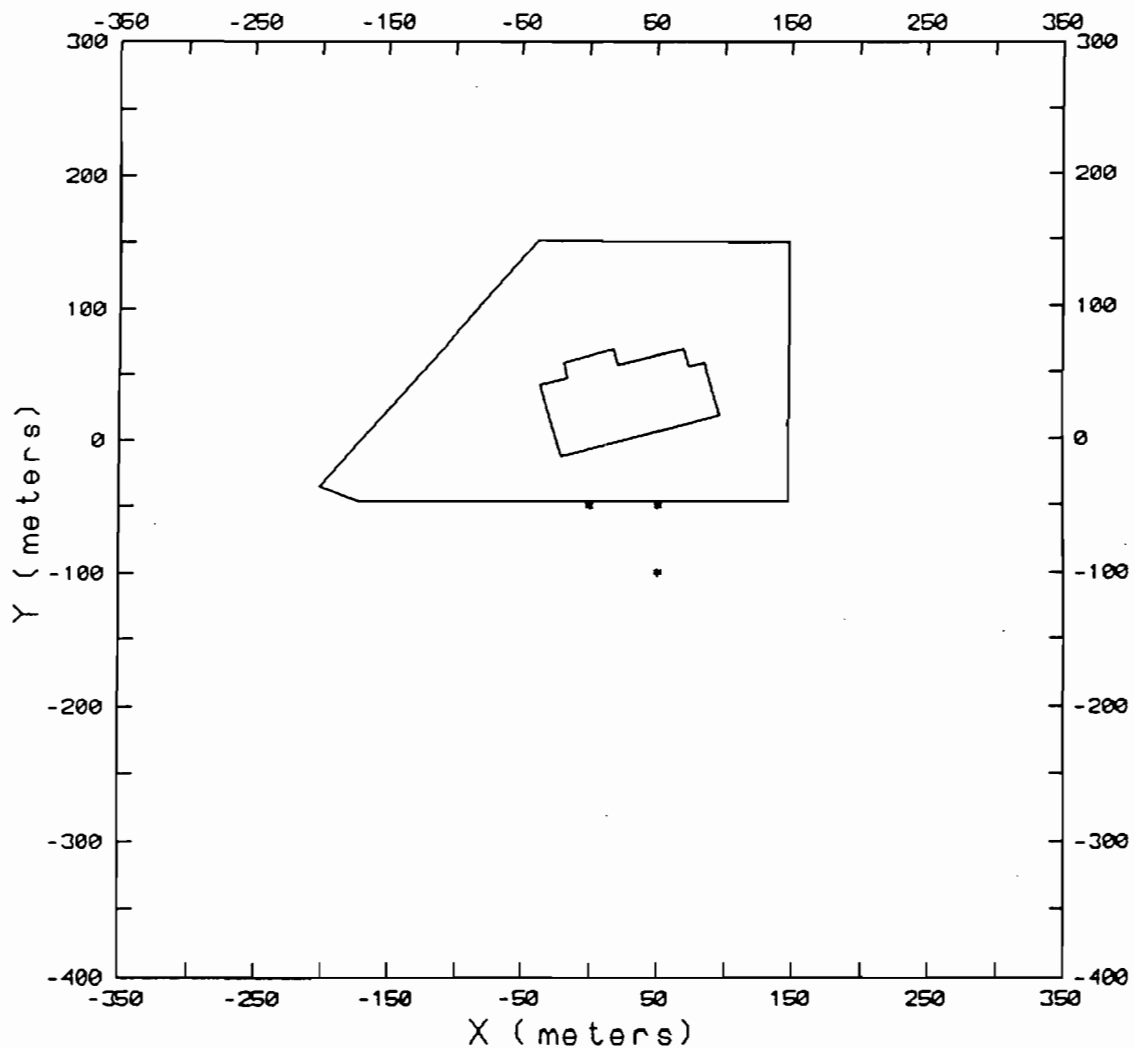


FIGURE 4-1.

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

Source: ECT, 1990.

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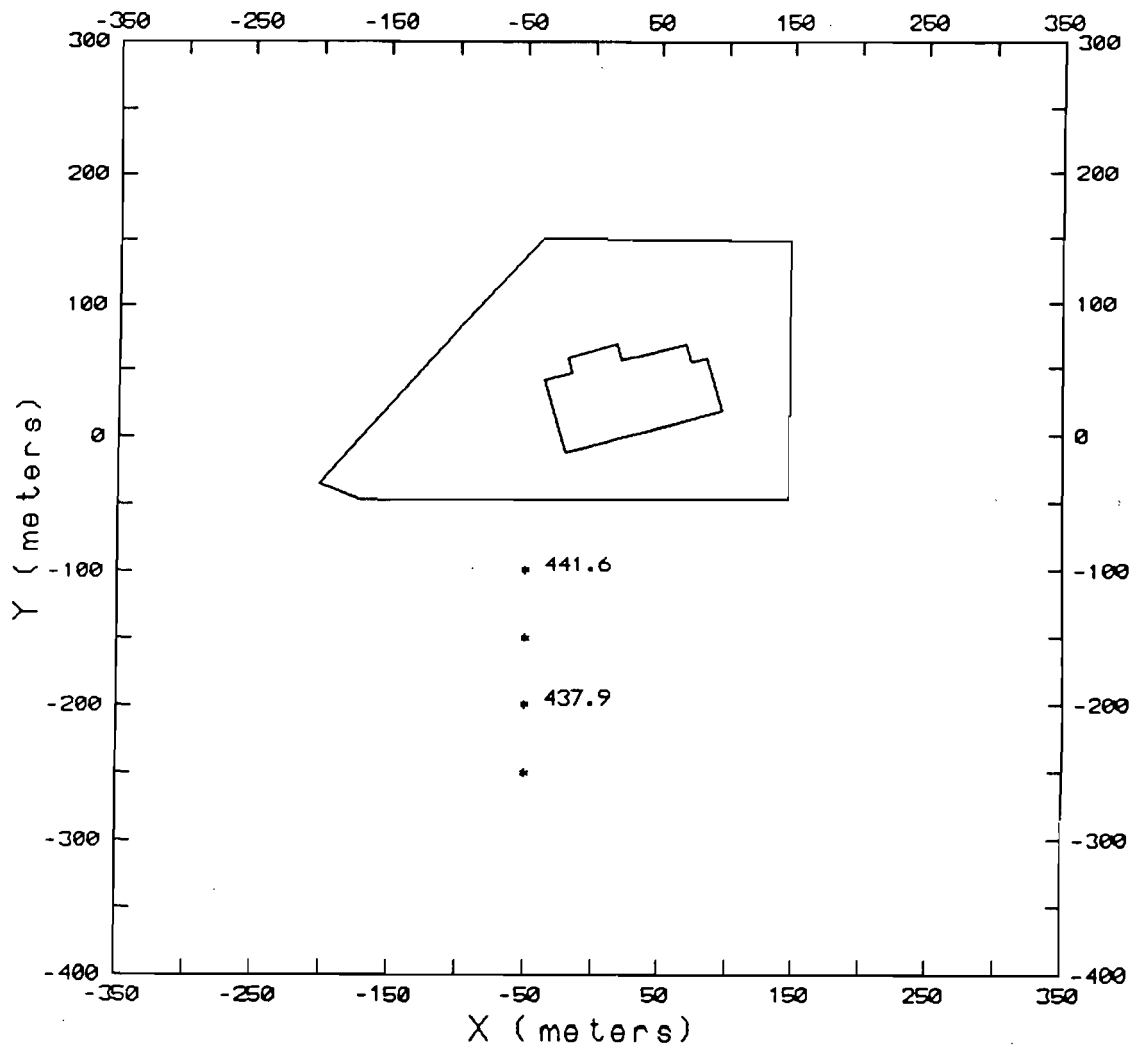


FIGURE 4-2.

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

Source: ECT, 1990.

ECT
Environmental Consulting & Technology, Inc.

It should also be noted that the scrap cyclones, Sources 10, 11, and 12, were found to contribute approximately 50 percent of the highest 24-hour concentrations. As previously mentioned, the operating requirements of these cyclones are such that no additional engineering can be done to improve the dispersion characteristics of these sources.

REFERENCES

Bowman Environmental Engineering (BEE). Undated. GEP Manual. Dallas, TX.

Florida Department of Environmental Regulation (FDER). Undated. The Florida Air Toxics Permitting Strategy (Draft). Tallahassee, FL.

U.S. Environmental Protection Agency (EPA). 1986. Guideline on Air Quality Models (Revised). EPA-450/2-78-027R. Research Triangle Park, NC.

U.S. Environmental Protection Agency (EPA). 1987. Industrial Source Complex (ISC) Dispersion Model User's Guide, Second Edition (Revised). EPA-450/4-88-002. Research Triangle Park, NC.

ATTACHMENT IX
ADDITIONAL IMPACT ANALYSIS

ADDITIONAL IMPACTS ANALYSIS

Growth

The workforce at the Gainesville Can Plant will increase by 12 employees due to the modernization project. Therefore, there will be no significant general residential, commercial, or industrial growth associated with the project and, as such, no significant growth related emissions.

Visibility

The increase in emissions from the proposed project are not anticipated to impair visibility, particularly in the Class 1 areas - Okefenokee National Wildlife Refuge, 60 miles north of the plant, and Chassahowitzka National Wildlife Refuge, 70 miles southwest.

Vegetation and Soils

Volatile Organic Compound emissions from the proposed facility can be expected to play some role in the local formation of ozone. Only extremely sensitive plants growing under the most ideal conditions are injured after exposure to 0.10 to 0.20 ppm ozone for one hour. Such ideal conditions rarely occur in the field. It would be unlikely, therefore, that injury from ozone would occur if the air quality standard of 0.12 ppm is not exceeded.

The primary commercial crops grown in Alachua County are corn, soybeans, tobacco, and peanuts. Natural timber found in the area consist of long leaf and slash pines, upland oak-hickory and wetland oak-gum-cypress.

The soils of the Gainesville area are typically sands, silts, clays overlying limestone formations.

The projected VOC emission increase from the modernization is not expected to participate in the ozone formation process to the extent that ambient levels will affect soils or the worst sensitive plant species.

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<p>3. Article Addressed to:</p> <p>Mr. Dean E. Pusch Manager, Regulatory Issues Environmental Affairs Department Anheuser-Busch Companies, Inc. Executives Offices St. Louis, MO 63118-1852</p>	<p>4a. Article Number</p> <p>P 872 562 707</p>
<p>5. Signature (Addressee)</p>	<p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p>
<p>6. Signature (Agent)</p> <p><i>[Signature]</i></p>	<p>7. Date of Delivery</p> <p><i>8/30/94</i></p>
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St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 8/25/94 AC01-185835 and PSD-FL-153(A)	

PS Form 3800, JUNE 1991



ANHEUSER-BUSCH COMPANIES

November 15, 1993

Via Federal Express #821-000-9636

RECEIVED

NOV 16 1993

Division of Air
Resources Management

Mr. C. H. Fancy, 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 Lid Plant
Permit AC 01-137740**

Dear Mr. Fancy:

Attached please find check #70127122 in the amount of \$250.00 to cover the processing fee for my request dated October 8, 1993 (copy attached) regarding the referenced permit.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Environmental Affairs Department

DEP:lb



USE THIS AIRBILL FOR SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII.
USE THE INTERNATIONAL AIRWAYBILL FOR SHIPMENTS TO PUERTO RICO AND ALL NON U.S. LOCATIONS.
QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

8210009636

3245M

8210009636

RECIPIENT'S COPY

From (Your Name) Please Print D. E. Pusch		Your Phone Number (Very Important) 314) 577-4162		To (Recipient's Name) Please Print Mr. C. H. Fancy, Chief		Recipient's Phone Number (Very Important) ()	
Company HEUSER-BUSCH CO INC		Department/Floor No.		Company Bureau of Air Regulation		Department/Floor No.	
Street Address BUSCH PLACE				Exact Street Address (Cannot Deliver to P.O. Boxes or P.O. Zip Codes) With Towers Office Building			
City LOUIS		State MO		City Tallahassee,		State FL	
ZIP Required 63118		ZIP Required 32399-24					
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.) 164-1907-162				IF HOLD AT FEDEX LOCATION, Print FEDEX Address Here Street Address City State ZIP Required			
PAYMENT 1 <input type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card 5 <input type="checkbox"/> Cash 6 <input type="checkbox"/> Check				Emp. No. Date Federal Express Use <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received FedEx Employee Number			
4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES WEIGHT In Pounds Only YOUR DECLARED VALUE (See right)		7	
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> OTHER PACKAGING 16 <input type="checkbox"/> FEDEX LETTER* 12 <input type="checkbox"/> FEDEX PAK* 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Standard Overnight (Delivery by next business afternoon. No Saturday delivery) 51 <input type="checkbox"/> OTHER PACKAGING 56 <input type="checkbox"/> FEDEX LETTER* 52 <input type="checkbox"/> FEDEX PAK** 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY* *Economy Letter Rate not available. Minimum charge: One pound Economy rate. Government Overnight (Registered for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE Freight Service (for packages over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT** (Confirmed reservation required) 80 <input type="checkbox"/> TWO-DAY FREIGHT** **Declared Value Limit \$500. **Call for delivery schedule.		Weekday Service 1 <input type="checkbox"/> HOLD AT FEDEX LOCATION WEEKDAY (Fill in Section H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY Saturday Service 31 <input type="checkbox"/> HOLD AT FEDEX LOCATION SATURDAY (Fill in Section H) 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) Special Handling 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 6 <input type="checkbox"/> DRY ICE Dangerous Goods Shipper's Declaration not required Dry Ice: 9 UN 1845, _____ X _____ kg. 904 III 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		Total Total Total DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> _____ lbs. L <input checked="" type="checkbox"/> W <input checked="" type="checkbox"/> H Received At 1 <input checked="" type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 12/92 PART #137204 FXEM 8/93 FORMAT #158 158 © 1992-93 FEDEX PRINTED IN U.S.A.	

John

11-2

Irisa would prefer to handle this with a letter amendment. Is this OK with you? We'll need to ask for a fee (letter attached)

Thanks
Patty

Pats updated

241047

OK
JRS
w/call notes
OK
GPL
11/7

P 872 562 499



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

Sent to Mr. Dean E. Pusch	
Street and No. One Busch Place	
P.O., State and ZIP Code St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 11/19/93 AC 01-185835	

PS Form 3800, JUNE 1991

P 872 562 491



**Receipt for
Certified Mail**

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

Sent to Mr. Dean E. Pusch	
Street and No. One Busch Place	
P.O., State and ZIP Code St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 11/03/93 AC01-137740	

PS Form 3800, JUNE 1991

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 Fee will provide you the signature of the person delivered to and the date of delivery.

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

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

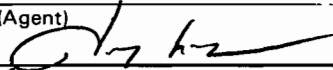
Mr. Dean E. Pusch
Senior Environmental Scientist
Anheuser-Busch Companies, Inc.
One Busch Place
St. Louis, MO 63118-1852

4a. Article Number

P 062 921 992

4b. Service Type

- Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery**5. Signature (Addressee)****6. Signature (Agent)**

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

PS Form 3811, November 1990 ☆ U.S. GPO: 1991-

DOMESTIC RETURN RECEIPT

"1459"
OK
GFL 8/18

P 062 921 992



Receipt for Certified Mail

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

Sent to Mr. Dean E. Pusch, AB Company	
Street and No. One Busch Place	
P.O., State and ZIP Code St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8-19-92 Permit: AC 01-185835 PSD-FL-153	

PS Form 3800, June 1991

SENDER: <ul style="list-style-type: none"> • 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 Fee will provide you the signature of the person delivered to and the date of delivery. 		I also wish to receive the following services (for an extra fee): <ol style="list-style-type: none"> <input type="checkbox"/> Addressee's Address <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Dean E. Pusch Sr. Environmental Scientist Anheuser-Busch Companies Executive Offices One Busch Place St. Louis, MO 63118-1852 <i>D. E. Pusch</i>		4a. Article Number P 832 538 779	
5. Signature (Addressee) <i>Anheuser-Busch</i>		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	
6. Signature (Agent)		7. Date of Delivery	
8. Addressee's Address (Only if requested and fee is paid)			

PS Form 3811, November 1990 * U.S. GPO: 1991-287-066 **DOMESTIC RETURN RECEIPT**

P 832 538 779



Certified Mail Receipt

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

Sent to	
Mr. Dean E. Pusch, A-B Co.	
Street & No.	
One Busch Place	
P.O., State & ZIP Code	
St. Louis, MO 63118-1852	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 2-21-92	
Permit: AC 01-185835	
PSD-FL-153	

PS Form 3800, June 1990



ANHEUSER-BUSCH COMPANIES

February 5, 1992

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

RECEIVED
FEB 10 1992
Division of Air
Resources Management

**RE: Metal Container Corporation - Gainesville
Lid Plant, DER File No. AC01-185835**

The continued availability of the end sealant currently used at the Gainesville Lid Plant is questionable. In order to have an available alternative, if needed, Metal Container Corporation requests approval from the Department to use a different end sealant compound/solvent combination. In order to change end sealant, the plant's lid customer must test and approve lids having the new compound. Metal Container Corporation will produce 25 million lids, or about eight days production, for this "trial".

The proposed compound has a lower VOC content and a lower density than the compound currently being used in production. Its n-hexane content of 26% is also lower than that of the current compound (30%). An additional solvent that is mist applied to clean the lid liners is required with this compound. MSDS's for the compound and the solvent are attached, as well as an EPA VOC Data Sheet for the compound.

The attached spreadsheet shows that there will be no increase in emissions during the trial run above the emissions from production of the same quantity of lids using the current compound.

Metal Container Corporation requests approval from the Department to utilize the additional required solvent during the compound trial run. Given the urgency in obtaining customer approval of the new compound, a rapid response to this letter would be greatly appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES

D. E. Pusch
D. E. Pusch
Environmental Affairs

DEP/tms
Attachment

2/11
@level of John:
Do you see
any problem
with this new
amendment, regarding
toxics? Let me
know. ^{NSP} _{John}

2/10/92
Teresa
This looks OK!
I agree with you
Peter

Teresa
No obvious new
air toxics problems
FSG
2/13



ANHEUSER-BUSCH COMPANIES

January 10, 1992

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

RECEIVED
JAN 21 1992
Division of Air
Resources Management

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

Dear Ms. Heron:

In order to optimize production capabilities at its Gainesville Lid Plant, Metal Container Corporation plans to operate three conversion presses as part of Module 6 and two conversion presses as part of Module 7. The plant configuration, identified in the referenced permit and the application, shows two presses on Module 6 and three on Module 7.

There will be no change in facility production or emissions that were previously represented and that are allowed by the permit. The only change is relocation of one conversion press and "reassignment" of it's emissions to Module 6 from Module 7.

A marked up version of the emissions summary table (originally submitted to DER April 25, 1991) is attached to show the "exchange" of the conversion press to Module 6 from Module 7. Also attached is a marked up version of Specific Condition 3 of the permit that reflects the switch in emission limits.

Please call me at 314/577-4162 if you have any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Sr. Environmental Scientist
Attachment

cc: *J. Heron*
A. Kutyma, NE Dist
J. Harper, EPA

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

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. Steve Smallwood
- 2.
- 3.
- 4.

OHF

Remarks:

Permit amendment letter for your signature.

From:

C Jones

Date

2/11

Phone



ANHEUSER-BUSCH COMPANIES

February 5, 1992

RECEIVED
FEB 10 1992

Division of Air
Resources Management

Ms. Teresa Heron
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. AC01-185835**

The continued availability of the end sealant currently used at the Gainesville Lid Plant is questionable. In order to have an available alternative, if needed, Metal Container Corporation requests approval from the Department to use a different end sealant compound/solvent combination. In order to change end sealant, the plant's lid customer must test and approve lids having the new compound. Metal Container Corporation will produce 25 million lids, or about eight days production, for this "trial".

The proposed compound has a lower VOC content and a lower density than the compound currently being used in production. Its n-hexane content of 26% is also lower than that of the current compound (30%). An additional solvent that is mist applied to clean the lid liners is required with this compound. MSDS's for the compound and the solvent are attached, as well as an EPA VOC Data Sheet for the compound.

The attached spreadsheet shows that there will be no increase in emissions during the trial run above the emissions from production of the same quantity of lids using the current compound.

Metal Container Corporation requests approval from the Department to utilize the additional required solvent during the compound trial run. Given the urgency in obtaining customer approval of the new compound, a rapid response to this letter would be greatly appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES

D. E. Pusch

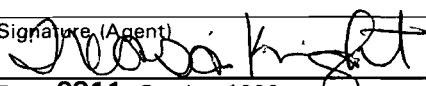
D. E. Pusch
Environmental Affairs

DEP/tms
Attachment

*John Glenn
said
no obvious
problems*


2/13

... waiting
for toxic
evaluation to
give an affirmative
answer to Dean
Pesch.

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 next to the article number.		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: Mr. Joseph Water, Plant Manager Metal Container Corporation 5909 N.W. 18th Drive Gainesville, Florida 32606		4a. Article Number P 832 539 854	
		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	
		7. Date of Delivery 7-1-91	
5. Signature (Addressee)		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent) 			

PS Form 3811, October 1990 U.S. GPO: 1990-273-861 **DOMESTIC RETURN RECEIPT**

P 832 539 854



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

Sent to	
Mr. Joseph Waters, Metal	
Street & No.	Container Corp.
5909 N.W. 18th Drive	
P.O., State & ZIP Code	
Gainesville, FL 32606	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 6-28-91	
Permit: AC 01-185835	
PSD-FL-153	

PS Form 3800, June 1990



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

RECEIVED
APR 4 1991
DER-BAQM

FEDERAL EXPRESS MAIL - 9401964714

April 3, 1991

Mr. Clair Fancy
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Metal Container Corporation
Gainesville, FL
AC 01-185835
PSD-FL-153

Dear Mr. Fancy:

Enclosed herewith is a copy of the Gainesville Sun publication "Notice of Intent" together with their original certification of publication for the referenced permit.

Please contact me at 904-378-8800 if you have any questions concerning this matter.

Sincerely,

Joseph J. Waters
Joseph J. Waters
Plant Manager

am

enclosures (2)

cc: M. Accardo
D. Pusch
D. Lafferty
J. Douglas

Teresa Heron }
Cleve Holladay } 4-5-91 AAM
Andy Kutyna, (NEO)



QUESTIONS? CALL 800-238-5355 TOLL FREE

AIRBILL
PACKAGE
TRACKING NUMBER

9401964714

9401964714

RECIPIENT'S COPY

From (Your Name) Please Print Joseph J. Waters		Your Phone Number (Very Important) 904 378-8800	To (Recipient's Name) Please Print Mr. Clair Fancy		Recipient's Phone Number (Very Important)
--	--	---	--	--	---

Company METAL CONTAINER CORP	Department/Floor No.	Company St. of FL DER, Air Quality Management	Department/Floor No.
--	----------------------	---	----------------------

Street Address 5009 NW 18TH DRIVE	Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes) Twin Towers Office Bldg. 2600 Blair Stone Rd.
---	--

City GAINESVILLE	State FL	ZIP Required 32606	City Tallahassee	State FL	ZIP Required 32399
----------------------------	--------------------	------------------------------	----------------------------	--------------------	------------------------------

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

IF HOLD FOR PICK-UP: Print FEDEX Address Here

PAYMENT: <input checked="" type="checkbox"/> Bill Sender <input type="checkbox"/> Cash <input type="checkbox"/> Check <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card	Street Address City State ZIP Required
---	---

SERVICES (Check only one box) Priority Overnight Service (Delivery by next business morning) Standard Overnight Service (Delivery by next business afternoon) Economy Two-Day Service (formerly Standard Air) (Delivery by second business day) Heavyweight Service (for Extra Large or any package over 150 lbs.) DEFERRED HEAVYWEIGHT	DELIVERY AND SPECIAL HANDLING (Check services required) <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box #) <input checked="" type="checkbox"/> DELIVER WEEKDAY <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) <input type="checkbox"/> DANGEROUS GOODS (Extra charge) <input type="checkbox"/> DRY ICE <input type="checkbox"/> OTHER SPECIAL SERVICE <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	PACKAGES WEIGHT in Pounds YOUR DECLARED VALUE Total Total Total DIM SHIPMENT (Chargeable Weight) Received At <input type="checkbox"/> Regular Stop <input type="checkbox"/> Drop Box <input type="checkbox"/> On-Call Stop <input type="checkbox"/> B.S.C. <input type="checkbox"/> Station FedEx Emp. No.	Emp. No. Date <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By Date/Time Received FedEx Employee Number Release Signature Date/Time	Federal Express Use Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 8/90 PART #119501 FXEM 10/90 FORMAT #041 041 © 1990 F.E.C. PRINTED IN U.S.A.
--	--	--	--	--

No 0738

STATE OF FLORIDA
COUNTY OF ALACHUA

THE GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA

Before the undersigned authority personally appeared Bette K. Congi

who on oath says that he/she is Classified Advertising 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,

March 30, 1991

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

1 day of April, A.D., 1991

Martha A. Plattison
(Seal) Notary Public

Bette Congi



"OFFICIAL NOTARY SEAL"
MARTHA A. PLATTISON
MY COMM. EXP. 4/8/94

STATE OF FLORIDA
Department of
Environmental
Regulation
Notice of Intent to Issue
The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Metal Container Corporation, 5909 N.W. 18th Drive, Gainesville, Alachua County, Florida, 32606, to construct/modify the Gainesville Lid Center facility. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.
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. 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 fourteen (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 proceeding (hearing) under Section 120.57, Florida Statutes.
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 No-

ice. 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, F.A.C.
The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; Department of Environmental Regulation, Northeast District, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7577
Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing may be requested by any person. Such requests must be submitted within 30 days of this notice.
(738) 3:30

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Joseph Waters Plant Manager Metal Container Corp. 5909 N.W. 18th Drive Gainesville, FL 32606	4. Article Number P 407 802 153
	Type of Service: <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
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>Thomas Knight</i>	
7. Date of Delivery 3-25-91	

PS Form 3811, Apr. 1989

* U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

P 407 802 153

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1985-234-555

Sent to Mr. Joseph Waters, Metal	
Street and No. Continer Corp. 5909 N.W. 18th Dr.	
P.O., State and ZIP Code Gainesville, FL 32606	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 3-21-91 Permit: AC 01-185835 PSD-FL-153	

PS Form 3800, June 1985



ANHEUSER-BUSCH COMPANIES

December 10, 1990

RECEIVED
DEC 24 1990
DER-BAQM

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

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

Dear Ms. Heron:

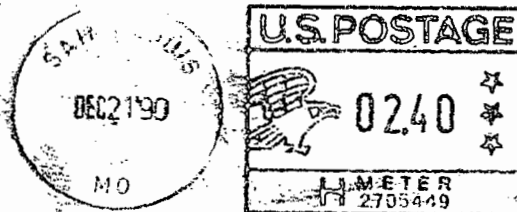
Metal Container Corporation has elected to change the cleanup solvent used at the Gainesville Lid Plant from a hexane-based product to one with a heptane base. This change will reduce emissions of n-hexane at the facility; thereby reducing both worker exposure and ambient off-property impacts.

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

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

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

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



RETURN POSTAGE GUARANTEED

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

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

P 256 396 204

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985
U.S.G.P.O. 1989-234-555

Sent to Mr. Robert M. Lanham, A B	
Street and No. Executive Office	Company
P.O., State and ZIP Code St. Louis, MO 63118-1852	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 9-28-90 Permit: AC 01-185835 PSD-FL-153	



ANHEUSER-BUSCH COMPANIES

RECEIVED

AUG 31 1990

DER-BAQM

August 29, 1990

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

Dear Mr. Fancy:

Enclosed please find ten copies of an Application to Construct for a modernization project for the Gainesville Lid Plant. The project will increase the facility's lid production capacity and subsequently will increase potential annual emissions of volatile organic compounds 241 tons above the currently permitted 323 tons. These emissions will be minimized by the use of low solvent/high solids compounds.

The copy of the document in the binder includes the signed and sealed copies of the application form. A check in the amount of \$5,000 is enclosed to cover the application fee.

Please call me at 314-577-4162 with any and all questions. As the permit is the critical path for construction, anything that can be done to expedite review would be appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Dean E. Pusch
Sr. Environmental Scientist
Enclosure
DEP:cd
DEP82990

cc: J. Dixon
C. Holladay
B. Andrews
C. Ketynda, NE Dist
G. Harper, EPA
S. Baruch, DER Gainesville - 8-29-90

RECEIVED
DER-MAIL ROOM
1990 AUG 31 AM 11:58

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

BEST AVAILABLE COPY

		INSTRUCTIONS 1. Type or print firmly 2. Complete applicable unshaded areas 3. Instructions in full on reverse 4. Call us if you have any questions!		 * 1 6 8 7 4 5 2 9 0 *		<table border="1"> <tr> <th>ORIGIN</th> <th>DESTINATION</th> </tr> <tr> <td>STL</td> <td>TLH</td> </tr> </table>		ORIGIN	DESTINATION	STL	TLH																																													
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4 SENT BY (COMPANY NAME) AMHEUSER BUSCH INCORPORATED Mr. Dean E. Pusch ONE BUSCH PLACE ST LOUIS, MO 63119		5 RECIPIENT (COMPANY NAME) Florida Dept. of Env. Regulation Chief Bureau of Air Regulation Mr. C. H. Fancy, P.E. Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400		6 SERVICES CHARGES <table border="1"> <tr> <td>DOCUMENT</td> <td>EXPRESS DOCUMENT</td> <td></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> </tr> <tr> <td colspan="3">WORLDWIDE PACKAGE EXPRESS</td> </tr> <tr> <td colspan="3"><input type="checkbox"/></td> </tr> <tr> <td>WORLDMAIL</td> <td><input type="checkbox"/> 1st CLASS</td> <td></td> </tr> <tr> <td></td> <td><input type="checkbox"/> 2nd CLASS</td> <td></td> </tr> <tr> <td colspan="3">SATURDAY SERVICE</td> </tr> <tr> <td colspan="3"><input type="checkbox"/></td> </tr> <tr> <td colspan="3">PROOF OF DELIVERY</td> </tr> <tr> <td colspan="3"><input type="checkbox"/> (POD)</td> </tr> <tr> <td colspan="3">OTHER</td> </tr> <tr> <td colspan="3"><input type="checkbox"/></td> </tr> <tr> <td colspan="3">ONFORWARDING</td> </tr> <tr> <td colspan="3"><input type="checkbox"/></td> </tr> <tr> <td colspan="3">EXPRESS CENTER/DROP BOX</td> </tr> <tr> <td colspan="3"><input type="checkbox"/></td> </tr> <tr> <td colspan="3">TOTAL</td> </tr> </table>		DOCUMENT	EXPRESS DOCUMENT		<input type="checkbox"/>	<input type="checkbox"/>		WORLDWIDE PACKAGE EXPRESS			<input type="checkbox"/>			WORLDMAIL	<input type="checkbox"/> 1st CLASS			<input type="checkbox"/> 2nd CLASS		SATURDAY SERVICE			<input type="checkbox"/>			PROOF OF DELIVERY			<input type="checkbox"/> (POD)			OTHER			<input type="checkbox"/>			ONFORWARDING			<input type="checkbox"/>			EXPRESS CENTER/DROP BOX			<input type="checkbox"/>			TOTAL		
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8 COMPLETE FOR WORLDWIDE PACKAGE EXPRESS (INTERNATIONAL DUTIABLE SHIPMENTS) DECLARED VALUE FOR CUSTOMS (SPECIFY CURRENCY) COMMODITY/TARIFF CODE SHIPPER'S EIN/SSN OR VAT NUMBER THIS SHIPMENT LICENSED BY THE UNITED STATES FOR EXPORT LICENSE NUMBER/SYMBOL ULTIMATE DESTINATION - DIVERSION CONTRARY TO U.S. LAW PROHIBITED IF ULTIMATE DESTINATION IS SOUTH AFRICA OR NAMIBIA. RESALE TO OR FOR DELIVERY, DIRECTLY OR INDIRECTLY TO OR FOR USE BY OR FOR POLICE OR MILITARY ENTITIES PROHIBITED.				RECIPIENT'S SIGNATURE X DATE / / TIME AM PM PLEASE PRINT NAME RECEIVED IN GOOD ORDER EXCEPT AS NOTED.																																																				
IMPORT CHARGES <input type="checkbox"/> DUTY <input type="checkbox"/> OTHER <input type="checkbox"/> TOTAL		9 <input type="checkbox"/> RECEIVER <input type="checkbox"/> SHIPPER CHARGE TO:		11 I/WE DO HEREBY AUTHORIZE DHL TO EXECUTE ANY ADDITIONAL DOCUMENTS NECESSARY FOR THE EXPORT OF MERCHANDISE DESCRIBED HEREIN ON MY/OUR BEHALF. DHL DOES NOT CARRY CASH. SHIPPER'S SIGNATURE DATE / / TIME AM PM PICKED UP BY DHL DATE / / TIME AM PM																																																				

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002860

DHL COPY - DESTINATION

Check Sheet

Company Name: METAL CONTAINER CORPORATION
Permit Number: AC01-185835
PSD Number: 153
Permit Engineer: SEPP

Application:

- Initial Application
 - Incompleteness Letters
 - Responses
 - Waiver of Department Action
 - Department Response
 - Other

Cross References:

-
-
-

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit

MISSING: MCC'S LETTER DATED - 6 NOVEMBER 1990

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 Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in one of the file drawers labeled Supplementary Documents Drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Metal Container Corporation

Permit(s) Numbered:

AC	01	-	185835
PSD	FL	-	153

Period during
which document
was received:

Detailed Description

APPLICATION 31 AUG 1990	1.	TWO ALUMINUM CAN BOTTOMS AND ONE ALUMINUM CAN TOP
----------------------------	----	---



ANHEUSER-BUSCH COMPANIES

bcc: J. W. Sugar
J. V. Stier
J. E. Lambert
B. A. Boeglin
T. J. Leebolt
J. D. Young
J. J. Walters
D. Stewart
M. M. Accardo
J. A. Voda
R. F. Wellise

RECEIVED
DER - MAIL ROOM
1992 FEB -3 AM 11:12

January 10, 1992

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

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

Dear Ms. Heron:

In order to optimize production capabilities at its Gainesville Lid Plant, Metal Container Corporation plans to operate three conversion presses as part of Module 6 and two conversion presses as part of Module 7. The plant configuration, identified in the referenced permit and the application, shows two presses on Module 6 and three on Module 7.

There will be no change in facility production or emissions that were previously represented and that are allowed by the permit. The only change is relocation of one conversion press and "reassignment" of it's emissions to Module 6 from Module 7.

A marked up version of the emissions summary table (originally submitted to DER April 25, 1991) is attached to show the "exchange" of the conversion press to Module 6 from Module 7. Also attached is a marked up version of Specific Condition 3 of the permit that reflects the switch in emission limits.

Please call me at 314/577-4162 if you have any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
Sr. Environmental Scientist
Attachment



ANHEUSER-BUSCH COMPANIES

January 10, 1992

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

RECEIVED
 JAN 24 1992
 Division of Air
 Resources Management

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

Dear Ms. Heron:

In order to optimize production capabilities at its Gainesville Lid Plant, Metal Container Corporation plans to operate three conversion presses as part of Module 6 and two conversion presses as part of Module 7. The plant configuration, identified in the referenced permit and the application, shows two presses on Module 6 and three on Module 7.

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Please call me at 314/577-4162 if you have any questions.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

Dean E. Pusch
 Sr. Environmental Scientist
 Attachment

cc: J. Heron
 A. Kutyma, DEQ
 G. Harper, EPA

Anheuser-Busch Companies, Inc.
 Executive Offices
 One Busch Place
 St. Louis, MO U.S.A. 63116-1852
 Telex 447 117 ANBUSCH STL

**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 2	1800	5400 3600	2.659 billion 1.773 billion
6	2 3	1800	3600 5400	1.773 billion 2.659 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

Coating/Solvent Specifications

<u>compound</u>	<u>typical mfg ident</u>	<u>density [lb/gal]</u>	<u>VOC content [wt frax]</u>	<u>usage rate [gal/1000lids]</u>
end sealant	DM 2140	7.82	0.405	0.0169
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 6.1	37.5 25.0
Texsolve C	4.7	19.3
Amsco 1241	6.4 0.3	1.6 1.1
total	32.9 29.8	135.2 122.1

	pounds/hr	tons/yr
Module 6		
end sealant	18.7	76.8
tab lube	6.1 9.1	25.0 37.5
Texsolve C	4.7	19.3
Amsco 1241	0.9 0.4	1.1 1.6
total	29.8 32.9	122.1 135.2

Module 5		
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

Module 4		
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

Off-line Conversion Presses		
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

Entire Facility		
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

09-Jan-92
01:33 PM

PERMITTEE:
Metal Container Corporation

Permit Number: AC 01-185835
Expiration Date: January 30, 1993

SPECIFIC CONDITIONS:

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

Pollutant	No-Threat Levels (ug/m3)		
	8-hr	24-hr	Annual
n-hexane	1,800	430	--
n-heptane	32,000	15,238	--
cyclohexane	1,000	238	--
cyclohexylmethane	32,000	7,619	--
toluene	--	--	2,000
benzene	--	--	0.123
stoddard solvent	5,250	1,250	--

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

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

Operating Requirements

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

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

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

**METAL CONTAINER CORPORATION
GAINESVILLE LID PLANT
END COMPOUND TRIAL**

VOC Emissions Basis

lid production 25 million
usage rates 1989 & 1990 actual

Coating/Solvent Specifications

<u>compound</u>	<u>typical mfg ident</u>	<u>density [lb/gal]</u>	<u>VOC content [wt frax]</u>	<u>usage rate [gal/1000lids]</u>
proposed				
end sealant	Darex S 9384	7.80	0.392	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
	Exxon Isopar H	6.33	1.000	0.0003
current				
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

Emissions from Production of 25 million Lids (in tons)

	<u>Proposed</u>	<u>Current</u>
end sealant	0.646	0.669
tab lube	0.353	0.353
solvents	0.206	0.183
total	1.204	1.205



ANHEUSER-BUSCH COMPANIES

February 5, 1992

RECEIVED

FEB 10 1992

Division of Air Resources Management

Ms. Teresa Heron
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. AC01-185835

The continued availability of the end sealant currently used at the Gainesville Lid Plant is questionable. In order to have an available alternative, if needed, Metal Container Corporation requests approval from the Department to use a different end sealant compound/solvent combination. In order to change end sealant, the plant's lid customer must test and approve lids having the new compound. Metal Container Corporation will produce 25 million lids, or about eight days production, for this "trial".

The proposed compound has a lower VOC content and a lower density than the compound currently being used in production. Its n-hexane content of 26% is also lower than that of the current compound (30%). An additional solvent that is mist applied to clean the lid liners is required with this compound. MSDS's for the compound and the solvent are attached, as well as an EPA VOC Data Sheet for the compound.

The attached spreadsheet shows that there will be no increase in emissions during the trial run above the emissions from production of the same quantity of lids using the current compound.

Metal Container Corporation requests approval from the Department to utilize the additional required solvent during the compound trial run. Given the urgency in obtaining customer approval of the new compound, a rapid response to this letter would be greatly appreciated.

Sincerely,

ANHEUSER-BUSCH COMPANIES

D. E. Pusch

D. E. Pusch
Environmental Affairs

DEP/tms
Attachment

*Said John Glenn
was obvious
problems*

2/13

... waiting
for toxic
evaluation to
give an affirmative
answer to Dean
Pusch.

Metal Container

Lid Modules

Gainesville

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
DIVISION OF AIR RESOURCES MANAGEMENT

AIR POLLUTION PERMIT APPLICATION - LONG FORM

See Specific Instructions for Form 17-220.900(1)

75D #0 153

APPLICANT CERTIFICATION

I, the undersigned, am the owner or authorized representative* of the facility described in this application. I certify that the statements made in this application for permit are true, correct, and complete to the best of my knowledge. Further, I agree to operate and maintain the source(s) of air pollutants and air pollution control equipment described in this application so as to comply with all provisions of Chapter 403, Florida Statutes, and all applicable rules and regulations of the Department of Environmental Regulation and revisions thereof. I also understand that any permit, if granted by the Department, will be nontransferable, and I will promptly notify the Department upon sale or legal transfer of any permitted source.

*Attach letter of authorization if not currently on file.

Signature

Date (See note below)

Note: Each subsequent page of this form must also be so dated.

APPLICATION FORM TYPE

This Application Involves (Check One):

- A single air pollutant emission source.
- A group of similar sources regulated collectively and addressed on this copy only of Form 17-220.900(1).
- A group of similar sources regulated individually and addressed on separate copies of Form 17-220.900(1).
This is form _____ of a total of _____ forms submitted.

APPLICATION PURPOSE

This Application is Submitted to (Check One):

- Obtain permit to construct new source or similar-source group.
- Obtain permit to modify existing source or similar-source group.
Current Air Construction Permit No. AC01-185835
- Application for air permit for previously unpermitted source or similar-source group.
- Supplement application for power-plant site certification.

PROJECT INFORMATION (Required for Air Construction/Modification Projects Only)

1. Description of Proposed Project (Attach Additional Information as Necessary)	
The project will consist of modernization of the facility. Two existing lid models (2 shell presses, 5 conversion presses & 11 liners) will remain. Other existing equipment will be replaced by two new shell presses, 7 conversion presses and 3 liners.	
2. Projected Dates of Commencement and Completion of Construction	
4-1-91 (permit issued 6/28/91)	8-1-92

PROFESSIONAL ENGINEER CERTIFICATION (Where Required by Chapter 471, F.S.)

Professional Engineer Information	
Name	Florida Registration Number
John H. Schamburg	29984
Organization/Firm	Telephone
metal Container Corporation	(314) 577-9556
I, the undersigned, certify that the engineering features of the source(s) of air pollutant emissions described in this permit application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with modern engineering principles applicable to the control of emissions of the air pollutants characterized in this application. There is reasonable assurance, in my professional judgement, that the source(s) of air pollutants and the air pollution control equipment, when properly operated and maintained, will comply with all applicable statutes of the State of Florida and all applicable rules and regulations of the Department of Environmental Regulation.	
Signature/Seal	Date

AIR020	Distict	Office	County	Facility	APIS
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	

FACILITY INFORMATION

1. Facility Owner/Company Name <i>Metal Containers Corporation</i>			
2. Facility Name/Street Address or Location Description <i>Lid Manufacturing Facility / 390 N.W 18th Drive</i>			3. Facility Location Zip Code
4. Facility City <i>Tainesville</i>		County <i>Alachua</i>	
5. Major Facility? <i>X</i>			7. Synthetic Minor Facility? <i>N</i>
6. Facility Type Code/Description <i>30 / Surface Coating Operation</i>			
8. Facility UTM Coordinates (km)	Zone	East <i>369.38</i>	North <i>3287.23</i>
9. Facility Lat./Long. (deg, min, sec)	Latitude <i>29° 42' 5"</i>		Longitude <i>82° 20' 53 W</i>
10. Facility Compliance Tracking Codes	CDS	VOC	11. RFP Tracked?
12. Facility Comment (60 Characters) <i>MCC proposes to expand the production capabilities of the facility and adding new manufacturing equipment.</i>			

SUPPLEMENTAL FACILITY INFORMATION

1. Area Map Showing Facility Location <input checked="" type="checkbox"/> Attached
2. Facility Plot Plan (Including Building Dimensions) <input checked="" type="checkbox"/> Attached
3. Precautions to Prevent Unconfined Emissions of Particulate Matter <input type="checkbox"/> Attached
4. Facility Flow Diagram <input checked="" type="checkbox"/> Attached

AIR021	Distict	Office	County	Facility	APIS
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

OWNER/CONTACT INFORMATION

1. Individual Owner or Authorized Representative		
Name <i>Joseph J. Waters</i>		
Organization/Firm <i>Metal Container</i>		
Street Address or P.O. Box <i>5909 N.W. 18th Drive</i>		
City <i>Gainesville</i>	State <i>Florida</i>	Zip <i>32606</i>
Telephone <i>(904) 378-8800</i>		
2. Facility Contact for Air Regulatory Matters		
Name		
Organization/Firm		
Street Address or P.O. Box		
City	State	Zip
Telephone ()		

DESCRIPTION OF SOURCE OR COLLECTIVELY-REGULATED SIMILAR-SOURCE GROUP

Lid modules 4, 5, 6 and 7

SUPPLEMENTAL SOURCE INFORMATION

1. Flow Diagram

Attached

2. Fuel Analysis

Attached

Not Applicable

3. Control Equipment Details

Attached

Not Applicable (No Control Equipment Used)

4. Other Information Required by Rule or Statute (Check if Attached)

PSD

NAA NSR

Other: _____

SOURCE OR
SOURCE-GROUP
IDENTIFIER

SOURCE APIS ID

AIR030	District 31	Office 5VL	County 01	Facility 0046	Source 02	APIS	
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APPLICATION PROCESSING AND SOURCE TRACKING INFORMATION

1. Construction Permit/PPS Information:					
Permit Number Assigned This Application AC 01-185835		PPS Number Assigned This Application		Fee Paid \$ 5000	
Date Permit Issued MM/DD/YY 6-28-91			Date Permit Expires MM/DD/YY 1-30-93		
2. Description of Source or Source-Group for APIS Tracking (60 Characters) This facility comprises 4 sources identified as Module 4, 5, 6 and 7. Each module have shell presser ^(SP) , end liners and conversion presses ^(EL) on different numbers.					
3. Similar Source APIS ID's (For Single Application Fee)					
4. Source Status C		5. Major Source? Y		6. AOR Required?	
7. Source Type Code 55 or 45?		8. Source SIC Code 3411		9. Escape PSD or NAA Review?	
10. NSPS	11. NESHAP	12. 111(d)	13. PSD 153	14. NAA NSR	15. RACT
16. Source Comment (104 Characters) Each module differs in the assigned quantity of equipment as follows: Module 4 (SP- 2 EL and 2 CP) Module 5 (SP, 4 EL and 3 CP) Module 6 (SP, 4 EL and 2 CP) Module 7 (SP, 4 EL and 3 CP) Off-line conversion presses: 2 CP					

AIR032	Distict	Office	County	Facility	Source	APIS

SOURCE OPERATION SCHEDULE INFORMATION

1. Typical Operating Schedule	hr/dy	dy/wk	2. Average Annual Operation	wk/yr	hr/yr
3. Typical % Hours of Operation by Season		DJF	MAM	JJA	SON
		25	25	25	25
4. Maximum Operating Schedule	hr/dy	dy/wk	wk/yr	hr/yr	
	24	7	52	8760	
5. Permitted Operating Schedule	hr/dy	dy/wk	wk/yr	hr/yr	
	24	7	52	8760	

SOURCE OPERATING RATE INFORMATION

1. Maximum Heat Input (Boilers Only)	Units
	Million Btu/Hour
2. Maximum Process Rate	Units
10.047	billions lids per year
3. Maximum Production Rate	Units

AIR033	District <input type="text"/>	Office <input type="text"/>	County <input type="text"/>	Facility <input type="text"/>	Source <input type="text"/>	APIS <input type="text"/>
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SOURCE EMISSION POINT INFORMATION

1. Emission Point Type <i>3</i>		2. Point ID on Diagram <i>see attachment</i>		3. Sources with Common Stack	
4. Stack Height (ft) <i>see attachment</i>		5. Exit Diameter (ft) <i>see attachment</i>		6. Exit Temperature (Degree Farenheit)	
7. Actual Volumetric Flow Rate (acfm) <i>see attachment</i>			8. Dry Standard Flow Rate (dscfm)		
9. Nonstack Emission Point Description and Height (ft)		10. Building Description(s) and Dimensions (ft) <i>see attachment</i>		Height	Width
11. Point UTM Coordinates - Optional (km)		Height	Width	12. Good Engineering Practice Stack Height (ft)	
13. Emission Point Comments (52 Characters) <i>In the modeling analysis the exhaust stacks at the roof of building were considered as stacks. See modeling reports for specific details.</i>					

SOURCE CONTROL EQUIPMENT INFORMATION

1a. Description of Control Equipment 'a' <i>N/A</i>		
1b. Description of Control Equipment 'b' <i>N/A</i>		
2. Year of Cost Estimate <i>N/A</i>	3. Estimated Annualized Capital Cost for Air Pollution Control	4. Estimated Annual Operating Cost for Air Pollution Control

Distict	Office	County	Facility	Source	APIS
AIR034					

SOURCE PROCESS INFORMATION

module 4

1a. Component Process or Fuel Type Employed 'a' <i>3.2 lbs VOC gal end sealant (per 1000 sq ft) & 6.0 lb VOC gal talc base</i>		2a. Source Classification Code <i>4-02-017-26 4-02-017-99</i>	
3a. Rate Units <i>tons solvent in coatings</i>	4a. Max Rate/Hour	5a. Rate Limit/Hour	
	6a. Estimated Rate/Year	7a. Rate Limit/Year <i>65</i>	
8a. Max % Sulfur —	9a. Max % Ash —	10a. MMBTU/Unit —	11a. % Sulfur Limit —
12a. SCC Comment for Above Process/Fuel (52 Characters) <i>Clean up solvents 6.32 lbs VOC gal mineral spirits & 5.84 lb VOC gal heptane This rate reflects the total VOC quantity in coatings</i>			

module 5

1b. Component Process or Fuel Type Employed 'b'		2b. Source Classification Code <i>4-02-017-26 4-02-017-99</i>	
3b. Rate Units <i>ton solvent in coatings</i>	4b. Max Rate/Hour	5b. Rate Limit/Hour <i>135</i>	
	6b. Estimated Rate/Year	7b. Rate Limit/Year	
8b. Max % Sulfur —	9b. Max % Ash —	10b. MMBTU/Unit —	11b. % Sulfur Limit —
12b. SCC Comment for Above Process/Fuel (52 Characters) <i>Clean up solvents 6.32 lb VOC gal mineral spirits & 5.84 lb VOC gal heptane This rate reflects the total VOC quantity in coatings</i>			

F

AIR034	Distict	Office	County	Facility	Source	APIS

module N^o 6

SOURCE PROCESS INFORMATION (Continued)

1c. Component Process or Fuel Type Employed 'c' 3.2 lbs VOC Gal end sealant (excluding water)		6.0 lbs VOC Gal tab glue		2c. Source Classification Code 4-02-017-26 4-02-017-99	
3c. Rate Units tons solvent in coatings	4c. Max Rate/Hour		5c. Rate Limit/Hour 135		
	6c. Estimated Rate/Year		7c. Rate Limit/Year		
8c. Max % Sulfur	9c. Max % Ash	10c. MMBTU/Unit		11c. % Sulfur Limit	
12c. SCC Comment for Above Process/Fuel (52 Characters) Clean up solvent 6.32 lbs VOC Gal mineral spirits + 5.84 lbs VOC Gal heptane					

Module N^o 7

1d. Component Process or Fuel Type Employed 'd' 3.2 lbs VOC Gal end sealant (excluding water)		6.0 lbs VOC Gal tab glue		2d. Source Classification Code 4-02-017-26 4-02-017-99	
3d. Rate Units tons solvent in coatings	4d. Max Rate/Hour		5d. Rate Limit/Hour 127		
	6d. Estimated Rate/Year		7d. Rate Limit/Year		
8d. Max % Sulfur	9d. Max % Ash	10d. MMBTU/Unit		11d. % Sulfur Limit	
12d. SCC Comment for Above Process/Fuel (52 Characters) Clean up solvent 6.32 lbs VOC Gal mineral spirits + 5.84 lbs VOC Gal heptane					

AIR038	District <input type="text"/>	Office <input type="text"/>	County <input type="text"/>	Facility <input type="text"/>	Source <input type="text"/>	APIS <input type="text"/>
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PSD INFORMATION

1. PSD Increment Consuming/Expanding? (C, E, or N) <p style="text-align: center;">N</p>	
2. Baseline Emissions	
SO2 Short Term (lb/hr)	SO2 Annual (ton/yr)
PM Short Term (lb/hr)	PM Annual (ton/yr)
NO2 Short Term (lb/hr)	NO2 Annual (ton/yr)
3. Permit Issue Date <p style="text-align: center;">PSD - F1 - 153 06-28-91</p>	
4. Last PSD Permit Date <p style="text-align: center;">no PSD permit before</p>	5. Last PSD Permit Number
6. Comments <p style="text-align: center;"><i>This is a source of VOC emissions PSD review was applicable only to VOCs.</i></p>	

Distict	Office	County	Facility	Source	APIS
AIR040					

POLLUTANT INFORMATION

1. Pollutant Emitted <i>VOCs</i>		2. Total % Efficiency of Control <i>- NA</i>	
3. Primary Control Device Code <i>- N/A</i>		4. Secondary Control Device <i>N/A</i>	
5. Emission Factor <i>N/A</i>	6. Emission Factor Units <i>N/A</i>	7. Emission Factor Reference <i>N/A</i>	
8. Potential Emission <i>Modules 4, 5, 6, 7</i>		<i>15.9</i> (lb/hr) <i>32.9</i> <i>32.9</i> <i>29.8</i>	<i>65.4</i> (ton/yr) <i>135.2</i> <i>135.2</i> <i>122.1</i>
9. Estimated Emission (ton/yr) <i>Module 4: 65.4</i> <i>Module 5: 135.2</i>		<i>Module 6: 135.2</i> <i>Module 7: 122.1</i>	10. Emission Estimate Method Code <i>2</i>
11. Requested Emission Limit(s)	<i>Module 4: 43.9</i> <i>5: 43.9</i> <i>6: 39.0</i> <i>7: 18.2</i>	<i>Module 6: 170.6</i> <i>7: 170.6</i> <i>151.7</i> <i>70.8</i>	12. Requested Emission Limit in Units Other Than lb/hr <i>N/A</i>
13. Allowable Emissions	<i>4: 15.9</i> <i>5: 32.9</i> <i>6: 32.9</i> <i>7: 29.8</i>	<i>65.4</i> <i>135.2</i> <i>135.2</i> <i>122.1</i>	14. Allowable Emission Limit in Units Other Than lb/hr <i>See standards gal.</i>
15. Regulation Code <i>PSD BACT</i>		16. CEM Required? <i>N/A</i>	
17. Compliance Test Frequency		18. Frequency Base Date	
19. Pollutant Comment (60 Characters) <i>a BACT was conducted for this facility. BACT determination is: the use of high solids / low VOC end sealant compounds, and the use of automated equipment to regulate talc use usage.</i>			

CALCULATIONS SHOWING BASIS OF POLLUTANT INFORMATION ON REVERSE

[Empty box for calculations]

AIR042	Distict	Office	County	Facility	Source		APIS
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

SOURCE VISIBLE EMISSIONS INFORMATION *N/A*

1a. Visible Emissions Subtype 'a'		
2a. Allowable Opacity	Normal Conditions	Exceptional Conditions
	%	% min/hr
3a. Regulation Code	4a. CEM Required?	

1b. Visible Emissions Subtype 'b'		
2b. Allowable Opacity	Normal Conditions	Exceptional Conditions
	%	% min/hr
3b. Regulation Code	4b. CEM Required?	

1c. Visible Emissions Subtype 'c'		
2c. Allowable Opacity	Normal Conditions	Exceptional Conditions
	%	% min/hr
3c. Regulation Code	4c. CEM Required?	

AIR060	Distict [][]	Office [][]	County [][]	Facility [][][]	Source [][]	APIS [][]
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BOILER INFORMATION

N/A

1. Boiler Manufacturer
2. Boiler Model Number
3. Boiler Type
4. Maximum Steam Production Rate (lb/hr) and/or Horsepower
5. Generator Nameplate Rating (Gross MW)
6. Boiler Comment

AIR061	Distict [][]	Office [][][]	County [][]	Facility [][][][]	Source [][][]	APIS [][][]
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INCINERATOR/RESOURCE RECOVERY INFORMATION *N/A*

1. Incinerator Manufacturer		
2. Incinerator Type		
3. Incinerator Maximum Design Capacity	lb/hr	ton/day
4. Dwell Time/Temperature sec. @ F	5. Afterburner Temperature F	
6. Type(s) of Waste Incinerated (Check All That Apply)		
<input type="checkbox"/> 0 - Trash <input type="checkbox"/> 1 - Rubbish <input type="checkbox"/> 2 - Refuse <input type="checkbox"/> 3 - Garbage <input type="checkbox"/> 4 - Biological (Including Biohazardous) <input type="checkbox"/> 5 - Nonsolid By-products <input type="checkbox"/> 6 - Solid By-products <input type="checkbox"/> 7 - Municipal Solid Waste <input type="checkbox"/> 8 - Hazardous Waste <input type="checkbox"/> Other: _____		
7. Generator Nameplate Rating (Gross MW) (Waste-to-Energy Facility Only)		
8. Incinerator Comment		

AIR062	Distict <input type="checkbox"/> <input type="checkbox"/>	Office <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	County <input type="checkbox"/> <input type="checkbox"/>	Facility <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Source <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	APIS <input type="checkbox"/> <input type="checkbox"/>
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STORAGE TANK INFORMATION *N/A*

1. Storage Tank ID	2. Storage Tank Type of Control
3. Storage Tank Product	4. Storage Tank Size Category
	<input type="checkbox"/> 10,500 bbl <input type="checkbox"/> 67,000 bbl <input type="checkbox"/> 250,000 bbl
5. Storage Tank Capacity (1000 gal)	6. Storage Tank Estimated Annual Throughput (1000 gal)
7. Storage Tank Comment	

1. Storage Tank ID	2. Storage Tank Type of Control
3. Storage Tank Product	4. Storage Tank Size Category
	<input type="checkbox"/> 10,500 bbl <input type="checkbox"/> 67,000 bbl <input type="checkbox"/> 250,000 bbl
5. Storage Tank Capacity (1000 gal)	6. Storage Tank Estimated Annual Throughput (1000 gal)
7. Storage Tank Comment	

AIR2071 space θ = name of CO.

SUPPLEMENTAL REQUIREMENTS

1. If not submitted previously, provide an up-to-date 8-1/2" x 11" map (e.g., the relevant portion of an USGS topographic map) showing the location of the facility and points of air pollutant emissions in relation to residences, roads, and other features of the surrounding area.
 Attached Submitted Previously

2. If not submitted previously, provide an up-to-date 8-1/2" x 11" plot plan of the facility showing the location of manufacturing processes, control equipment, stacks, vents, and sources of fugitive emissions.
 Attached Submitted Previously

3. If not submitted previously, provide an up-to-date 8-1/2" x 11" flow diagram identifying the individual operations and processes. Indicate where raw materials enter, where solid and liquid wastes exit, where gaseous and/or particulate emissions are involved, and where finished products are obtained.
 Attached Submitted Previously

4. For an construction permit application, provide an estimate of the maximum uncontrolled emission rate (in lb/hr) of each pollutant emitted and show the derivation of each such estimate (e.g., AP-42 emission factor). For a construction permit application involving the combustion of any fuel other than distillate oil, liquefied petroleum gas, or natural gas, provide an ultimate analysis of the fuel to be used. The ultimate analysis should give the density, the heat content, and the percent content by weight of carbon, hydrogen, oxygen, sulfur, nitrogen, ash, and moisture.

5. For a construction permit application, show the bases of the potential (after control) emission estimates (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and describe the proposed methods for showing proof of compliance with any applicable emission limiting standards.

6. For a construction permit application, provide design details for all air pollution control systems (e.g., for baghouse, include cloth to air ratio; for scrubber, include cross-section sketch, design pressure drop, etc.). For each such system, provide either a copy of the manufacture's guarantee of control efficiency or an engineering estimate of control efficiency as certified by a registered professional engineer. Items 4, 5, and 6 should be consistent; i.e., $\text{Uncontrolled Emission} = (\text{Potential Hourly Emission}) / (1 - \text{Control Efficiency})$.

7. For a construction permit application subject to review under Rule 17-2.500, "Prevention of Significant Deterioration," or Rule 17-2.510, "New Source Review for Nonattainment Areas," provide all additional information required by the department under such rule (e.g., summary of contemporaneous emission changes, BACT or LAER evaluation, monitoring data, summary of modeling results, one copy of all pertinent model output, etc.).

8. For a permit application subject to the "Reasonably Available Control Technology" provisions of Rule 17-2.650, provide all additional information required by the department under that rule.

9. For a permit application involving the incineration of hazardous wastes, provide all additional information required by the department under Rule 17-30 and Chapter 403, Florida Statutes.

10. Submit the appropriate application fee in accordance with Rule 17-4.05. The check should made payable to the Florida Department of Environmental Regulation.