

Check Sheet

Company Name: WELLS METAL CONTAINER CORPORATION

Permit Number: AC 16-187863

PSD Number: _____

Permit Engineer: _____

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Cross References:

- AC 16-127873
- AC 16-50418
- AC 16-57752
- AC 16-57753

Intent:

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

ADD'L INFO REC'D 11/29/90

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination *LABR*
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other



to file

**Metal Container
Corporation**

ONE OF THE ANHEUSER-BUSCH COMPANIES

June 26, 1992

*July 6 11
talked to Jim - P about it*

RECEIVED

JUL 06 1992

Division of Air
Resources Management

Mr. Ron Roberson
City of Jacksonville
Department of Regulatory & Environmental Services
Air Quality Division
421 West Church Street
TownCentre - Suite 412
Jacksonville, FL 32202

RE: APPROVAL OF ALTERNATE PROCEDURE
Permit Nos. AC16-187863 & AC16-199113
Metal Container Corporation
1100 North Ellis Road
Jacksonville, FL 32205-6275

Dear Mr. Roberson:

This letter is a request for Approval of Alternate Procedure pursuant to Florida regulation 17.2.700(3). Metal Container Corporation requests approval to use EPA Method 25A for destruction efficiency testing of a thermal oxidizer in lieu of Method 25 due to VOC concentration of less than 50 ppm in the oxidizer exhaust.

Information required under 17.2.700(3) is presented below.

1. Source : thermal oxidizer,
destruction efficiency testing is required
under Specific Condition 12. of Permit
AC16-199113 and Permit AC16-187863.
2. Specific provision of Section 17-2.700:
Table 700-1
Can Coating, 17-2.650(1)(f)1.
Add-on Control Device
 - a. Destructive testing for volatile organic
compounds
3. Basis for exception:
EPA Method 25 has a relatively high minimum detectable
level of 50 ppm. It is not suitable for testing sources
below this level. Since Metal Container Corporation
utilizes water based, compliant coatings, the outlet of
the thermal oxidizer typically contains less than 50
ppm VOC.

4. Alternate procedure sought:
EPA Method 25A is the recommended method for testing VOC emissions from sources that have emissions below the minimum detectable level of Method 25, copy of EPA EMTIC GD-011 enclosed. Metal Container Corporation therefore requests use of Method 25A in lieu of Method 25

A check in the amount of \$250.00 is enclosed for this request. Please call me at the number shown below if you need additional information or have questions on the enclosed.

Sincerely,

Marlene Accardo

Marlene Accardo
Manager, Environmental Engineering
(314) 957-9529

cc: R. Wellise
W. McClarnand
D. Pusch
J. Reed

James Pennington -
FL DER
Teresa Heron -
FL DER
Jeremy W. Lucas -
City of Jacksonville

EMISSION MEASUREMENT TECHNICAL INFORMATION CENTER
GUIDELINE DOCUMENT

Applicability of Methods 25 and 25A

SUMMARY

State regulations sometimes require testers to measure VOC emissions from sources where the concentration of VOC is less than 50 ppm as carbon. We recommend that Method 25A be used to measure the concentration of VOC emissions from these kind of sources.

DISCUSSION

There are three EPA test methods that are appropriate for measuring total VOC emissions. These are Methods 25, 25A, and 25B. Method 25 is designed to measure the destruction efficiency of incinerators used to control VOC emissions from coating sources. While it would be generally applicable to any source, it has a relatively high minimum detectable level of 50 ppm, as carbon. This would limit its usefulness at sources where VOC emissions are less than 50 ppm.

We recommend that testers use Method 25A for measuring VOC emissions from sources that have VOC emissions that are below the minimum detectable level of Method 25. This approach is not without problems. When Method 25A is used to measure unknown VOC emissions, there is a potential negative bias in the results. In addition, if methane is present in the source emissions, a separate method would be required to measure the methane and subtract it from total organic emissions measured by Method 25A to determine VOC. Despite these problems, Method 25A is the only EPA procedure that can measure total VOC at the levels present at some sources.



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

006954

CHECK DATE	CHECK NUMBER
6-26-92	006954

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

VOID 180 DAYS AFTER ISSUANCE

62-26
311

-09
2338

TO THE ORDER OF: FLORIDA DEPT. OF ENVIRONMENTAL REGULATION
CITY OF JACKSONVILLE _ DEPT. OF REGULATORY & ENVIRONMENTAL SERVICES
421 W. CHURCH STREET
JACKSONVILLE, FLORIDA 32202

PAY THIS AMOUNT
\$***250.00***

METAL CONTAINER CORPORATION

AUTHORIZED SIGNATURE
J. P. ...
AUTHORIZED SIGNATURE



BEST AVAILABLE COPY

**MCC - JACKSONVILLE CAN PLANT
STATE INVENTORY FORM (APIS)**

operation	SCC	VOC Emissions					units
		Line 2	Line 3	Line 4	Line 5	Respray	
Basecoat	4-02-017-21	289.9	290.1	290.1	0.0	na	lb/ton solvent in coating
Inside spray	4-02-017-22	1,993.1	1,992.9	1,992.9	545.3	1,997.5	lb/ton solvent in coating
Overvarnish	4-02-017-28	423.3	384.3	384.3	406.1	na	lb/ton solvent in coating
Two-piece can coating line	4-02-017-35	228,220.0	209,300.0	209,300.0	77,380.0	na	lb/coating line

EMISSIONS BASIS

coating	usage (gal)	density (lb/gal)	VOC fraction (wt)	total emissions (tpy)
Basecoat				
Line 2	39,357	11.3	0.085	2.74
Line 3	48,234	11.3	0.085	3.36
Line 4	48,234	11.3	0.085	3.36
Line 5	0			0
Inside spray				
Line 2	154,792	8.5	0.145	95.06
Line 3	139,810	8.5	0.145	85.85
Line 4	139,810	8.5	0.145	85.85
Line 5	114,324	8.5	0.145	19.21
Respray	1,576	8.5	0.145	0.97
Overvarnish				
Line 2	81,602	8.8	0.11	8.36
Line 3	74,099	8.8	0.11	7.59
Line 4	74,099	8.8	0.11	7.59
Line 5	215,708	8.8	0.11	8.02
All operations				
Line 2 (a)				114.11
Line 3 (a)				104.65
Line 4 (a)				104.65
Line 5 (a)				38.69
Respray & parts cleaning				5.82
Facility total				367.92

(a) Includes inks and miscellaneous cleanup solvents



ANHEUSER-BUSCH COMPANIES

FACSIMILE TRANSMISSION

NO PAGES

TO: T. HERON	PHONE: 904-922-6979
DEPT / CO:	
FROM: D. PUSCH	PHONE: 314/577-4162
DEPT / CO:	
COMMENTS:	

MESSAGE CONFIRMATION

JAN-27-'93 MON 15:08

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-8979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	AI	MG
014	01-27	15:05	00:03:35	ENVIRONMENTAL ENGR		01	00



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

DATE: Jan 27, 1992

NAME(S): Dean Burch

DEPARTMENT/COMPANY: Anheuser - Burch Co

PHONE: 314-577-4162 FAX: 314-577-~~1032~~ ¹⁰³²

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Heron Teresa

DEPARTMENT: D.E.R

OFFICE PHONE: 904-488-1344 FAX PHONE: 904-922-6979

SENDER: Teresa Heron

COMMENTS: Page 10 of APIS form
Pages 176 and 175 of SCC

Have a Good Day!

AIR034	Distict	Office	County	Facility	Source	APIS
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

SOURCE PROCESS INFORMATION (Continued)

1c. Component Process or Fuel Type Employed 'c'		2c. Source Classification Code	
3c. Rate Units	4c. Max Rate/Hour		5c. Rate Limit/Hour
	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)			

1d. Component Process or Fuel Type Employed 'd'		2d. Source Classification Code	
3d. Rate Units	4d. Max Rate/Hour		5d. Rate Limit/Hour
	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)			

From APIS form

①
Source Classification Codes (SCC)

SCC	Process Name	PART Lbs/Unit	PM10 Lbs/Unit	SOx Lbs/Unit	NOx Lbs/Unit	VOC Lbs/Unit	CO Lbs/Unit	LEAD Lbs/Unit	UNITS	NOTES
<u>Surface Coating of Light Trucks - 3713</u>									<i>total</i>	
4-02-016-30	Guide Coating: Water-Borne	---	---	0.0	0.0	5.06	0.0	---	Vehicles Produced	
4-02-016-31	Topcoat: Solvent- Borne	---	---	0.0	0.0	34.0	0.0	---	Vehicles Produced	
4-02-016-32	Topcoat: Water-Borne	---	---	0.0	0.0	15.47	0.0	---	Vehicles Produced	
4-02-016-99	Other Not Classified	XXX	XXX	0.0	0.0	2000.0	0.0	XXX	Tons Solvent in Coating	
<u>Metal Can Coating - 3411</u>										
4-02-017-02	Cleaning / Pretreatment	---	---	0.0	0.0	0.0	0.0	---	Tons Solvent in Coating	
4-02-017-03	Coating Mixing	---	---	0.0	0.0	200.0	0.0	---	Tons Solvent in Coating	
4-02-017-04	Coating Storage	---	---	0.0	0.0	0.0	0.0	---	Tons Solvent in Coating	
4-02-017-05	Equipment Cleanup	---	---	0.0	0.0	200.0	0.0	---	Tons Solvent in Coating	
4-02-017-21	Two Piece and Exterior Base Coating	---	---	0.0	0.0	900.0	0.0	---	Tons Solvent in Coating	
4-02-017-22	Interior Spray Coating	---	---	0.0	0.0	400.0	0.0	---	Tons Solvent in Coating	
4-02-017-23	Sheet Base Coating (Interior)	---	---	0.0	0.0	400.0	0.0	---	Tons Solvent in Coating	
4-02-017-24	Sheet Base Coating (Exterior)	---	---	0.0	0.0	400.0	0.0	---	Tons Solvent in Coating	
4-02-017-25	Side Seam Spray Coating	---	---	0.0	0.0	100.0	0.0	---	Tons Solvent in Coating	
4-02-017-26	End Sealing Compound	---	---	0.0	0.0	100.0	0.0	---	Tons Solvent in Coating	
4-02-017-27	Lithography	---	---	0.0	0.0	2000.0	0.0	---	Tons Solvent in Coating	
4-02-017-28	Over Varnish	---	---	0.0	0.0	200.0	0.0	---	Tons Solvent in Coating	
4-02-017-31	Three-piece Can	---	---	0.0	0.0	352000.0	0.0	---	Coating Lines	

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2

SCC	Process Name	PART Lbs/Unit	PM10 Lbs/Unit	SOx Lbs/Unit	NOx Lbs/Unit	VOC Lbs/Unit	CO Lbs/Unit	LEAD Lbs/Unit	UNITS	NOTES
<u>Metal Can Coating - 3411</u>										
4-02-017-32	Sheet Basecoating Three-piece Can	---	---	0.0	0.0	11000.0	0.0	---	Coating Lines	
4-02-017-33	Sheet Lithographic Coating Line Three-piece Beverage Can-Side Seam Spray Coating	---	---	0.0	0.0	40000.0	0.0	---	Coating Lines	
4-02-017-34	Three-piece Beverage Can Interior Body Spray Coat	---	---	0.0	0.0	176000.0	0.0	---	Coating Lines	
4-02-017-35	Two-piece Can Coating Line	---	---	0.0	0.0	574000.0	0.0	---	Coating Lines	
✓ 4-02-017-36	Two-piece Can End Sealing Compound	---	---	0.0	0.0	30000.0	0.0	---	Coating Lines	
4-02-017-99	Other Not Classified	XXX	XXX	0.0	0.0	2000.0 (c)	0.0	XXX	Tons Solvent in Coating	
<u>Metal Coil Coating - 3353, 3354</u>										
4-02-018-01	Prime Coating Application	---	---	0.0	0.0	800.0	0.0	---	Tons Solvent in Coating	
4-02-018-03	Solvent Mixing	---	---	0.0	0.0	200.0	0.0	---	Tons Solvent in Coating	
4-02-018-04	Solvent Storage	---	---	0.0	0.0	0.0	0.0	---	Tons Solvent in Coating	
4-02-018-05	Equipment Cleanup	---	---	0.0	0.0	200.0	0.0	---	Tons Solvent in Coating	
4-02-018-06	Finish Coating	---	---	0.0	0.0	800.0	0.0	---	Tons Solvent in Coating	
4-02-018-99	Other Not Classified	XXX	XXX	0.0	0.0	2000.0	0.0	XXX	Tons Solvent in Coating	
<u>Wood Furniture Surface Coating - 2511, 2512, 2517, 2521</u>										
4-02-019-01	Coating Operation	---	---	0.0	0.0	2000.0 (c)	0.0	---	Tons Solvent in Coating	
4-02-019-03	Coating Mixing	---	---	0.0	0.0	200.0	0.0	---	Tons Solvent in Coating	

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4/8/92

MEETING WITH ANHEUSER-BUSCH

<u>NAME</u>	<u>REPRESENTING</u>	<u>PHONE</u>
Jim PENNINGTON	FDER	(904) 488-1344
TERESA HERON	FDER	(904) 488-1344
DEAN PUSCH	ANHEUSER-BUSCH	(314) 577-4162
Marlene Accardo	Metal Container Corp	(314) 957-9529

DISCUSSION ISSUES
METAL CONTAINER CORPORATION

APRIL 8, 1992

JACKSONVILLE PLANT

Cons

PERMIT AC 16-199113

o TEST METHODS

DESTRUCTION EFFICIENCY OF THERMAL OXIDIZER - METHOD 25

CAPTURE EFFICIENCY - EPA MEMORANDUM 4/16/90 USING TTE

o VOC RECORDKEEPING

DAILY, MONTHLY

ANNUAL REPORTS

o START-UP OPERATIONS

INSIDE SPRAY

INKS AND VARNISH

GAINESVILLE PLANT

lids

PERMIT AC 01-185835

o VOC RECORDKEEPING

DAILY, MONTHLY

ANNUAL REPORTS

o END SEALANT 3.2# / Gal *[hexane]*

ALTERNATIVE SEALANT - LOWER TOXICITY SOLVENT *[heptane]* 3.5 lb / Gal

smaller
NEW LID SIZE - REDUCED USAGE

**METAL CONTAINER CORPORATION
 JACKSONVILLE BEVERAGE CAN MANUFACTURING FACILITY (LNSSTRUP)
 LINE 5 STARTUP EMISSIONS**

LINE 5 PRODUCTION - 5000 CANS PER HOUR MAX; 85,000 CANS TOTAL (8/1 -7/13)

COATING/SOLVENT	MANUFACTURERS IDENTIFICATION	USAGE (GALS)	DENSITY (PPG)	VOC		VOC EMISSIONS	
				FRACTION (BY WEIGHT)	USAGE RATE (GALS/1000 CANS)	(LBS/HR)	(TOTAL LBS)
INSIDE SPRAY	GLID 840-C-554	1.1	8.50	0.145	0.210	1.3	21.9
VARNISH	PPG 3625X	0.5	8.80	0.110	0.108	0.5	8.7
INK	ACME MISC	0.1	10.50	0.220	0.010	0.1	2.0
TOTAL						1.9	32.6

CONSTRUCTION PERMIT NO AC 16-199113 LIMIT FOR LINE 5 0.110 TONS/DAY

STARTUP EMISSIONS FOR LINE 5 0.003 TONS/DAY

10 weeks → 17 HRS
 2 SHIFTS

CAN MANUFACTURING: PROBLEMS WITH CAPTURE EFFICIENCY PROTOCOLS

I. Two threshold policy issues

1. Whether mandating use of enclosures as the sole technique to measure CE makes economic, environmental or program sense for this industry.
2. Whether generic alternatives can serve EPA's ends of more accurate CE measurement without disproportionate costs, disruption, intrusiveness.

II. Preliminary observations

- Not attacking need to measure CE as part of SIPs;
 - Not attacking CE guidance generally, just its application to discontinuous, non-steady state can coating operations;
 - Issue is measurement (relative accuracy of CE measurement techniques), not control ;
 - Think guidance is legally vulnerable, but that's not our point.
- Guidance is super-CTG whose adoption as RACT is required
 - States must select RACT in first instance; RACT must be technically and economically feasible, may not be selected by default;
 - guidance is legislative rule as applied: changes past practice, substantially limits agency discretion;
 - guidance goes beyond "presumptive norm" to mandate its adoption on pain of SIP disapproval and severe sanctions, limits ability of states to justify alternatives;
 - guidance not ratified in CAAA because Congress at most ratified CTGs that underwent meaningful public participation and a feasibility analysis ;
 - presumptive norm process not supported by 1977 CAA amendments, which apply absent CAAA ratification.
 - essentially arbitrary (no supporting data, approval of I/I)

do 1990 CAAA
support presumptive
norm process?

?

- Our point is use of enclosures to measure CE for discontinuous can operations
 - has no valid theoretical rationale for this industry
 - has never been demonstrated to work significantly better than existing methods for this industry
 - entails disproportionate costs for marginal accuracy gains in a test method
 - is regulatory overkill where measurement alternatives exist which can be reasonably as accurate as use of enclosures for this process.
- EPA committed to implement CAAA cost effectively.
- Dissatisfaction with rigid, yet uncertain CE protocols among states, regions.

III. Focus on Can Coating-Line CE Options

- Due to line resupply needs, frequent jams, other unique operational features, this industry's options are severely limited. Its only available option is a TTE large enough to place operator inside.
- Due to downtime caused by enclosure and resulting downward bias of TTE CE formulae, a TTE with operator outside does not produce reliable test results, may artificially create noncompliance, is technically infeasible.
- Due to line access needs, any PTE (to avoid testing) with the operator outside is not feasible, since line availability could permanently drop nearly 50%.
- PTEs, BEs or REs with operator inside ("PEs") built to avoid testing are not available options. There is no legitimate choice between TTE's to measure CE and PEs to avoid measuring CE.
 - PEs would retrofit new control requirements, whether a source is forced to use them for technical or cost reasons relating to TTEs.
 - PE's are supposed to be voluntary options, must also be independently "available" (i.e., technically and economically feasible), cannot be mandated as the sole "available" compliance option

- latter result would effectively change VOC control requirements to 100% (less destruction efficiency) without appropriate SIP proceedings. EPA cannot increase control requirements through a test method. Cf. U.S. v. Zimmer Products, Inc.
 - PEs could automatically be MACT (100% capture) for can-making. EPA may set MACT using MACT notice-and-comment procedures, but it cannot effectively mandate MACT under guise of a test method or in disregard of the prioritized schedule under § 112.
 - PEs are not a test method but a compliance requirement, since they are presumed to provide 100% capture without testing. It is neither fair nor permissible for EPA to offer as the sole preapproved alternative to an onerous test method a compliance option which mandates greater than required capture. This would alter VOC compliance requirements for the can industry to an incinerator plus a PE without consideration of "availability."
 - PEs could cost more than TTEs: \$500k - \$1.5mm based on older plants typical of this industry; nearly \$2 million / line if ovens must be enclosed too.
 - PEs make little sense to avoid a single CE test.
- This leaves the can industry only one CE option: a TTE with the operator(s) inside.

IV. Cost Analysis of Only Available Option

- CMI concedes a TTE with the operator inside may be technically feasible.
 - Will avoid lack of access, increased downtime, downward bias, phantom noncompliance. But:
 - aerodynamic engineering problems for large enclosures:
 - TTE itself changes air flow patterns.
 - fan needed to provide artificial fugitives for measurement may reduce effectiveness of capture hoods in the enclosure.

- bigger incinerator needed.
- costs increase exponentially with TTE volume, number of test points.
- Problems may be resolvable, but resolution could take significant engineering analysis, at additional time and expense. Some problems may not allow approvable TTE.
- TTEs with operator inside are economically infeasible
 - multi-line TTE requires shutdown of all other lines during extended tests
 - single-line TTE requires shutdown of adjacent lines
 - direct costs of 3 8-hour tests also disproportionately high
- CMI estimates that at typical six line plant, production losses due to shutdown of other lines during testing would be severe, but less severe with a single line TTE than a multi-line TTE. Based on this least expensive option, CMI estimates test costs at a six line plant to be \$54,103/line and production losses (conservatively assuming 1 shift per day 5 days a week and TTE construction over weekends) to be \$68,096/line, for a total test cost of \$122,199 per line. See Appendix A.

V. Increased Accuracy: The Cure is Worse Than the Disease

- EPA's TTE test protocols and procedures unreasonably discount traditional l/g as applied in this industry.
 - EPA probable error for l/g mass balance based on simultaneous, web-fed operations; no empirical evidence true for cans
 - TTE degree of accuracy over traditional l/g mass balance for sequential, few-solvent processes never demonstrated.
 - cans much closer to traditional l/g test in operation than web-fed continuous operations
 - TTE l/g method allows VOCs in liquid coatings (L) to be measured, but only for comparison to gaseous fugitives (F) rather than gas captured (G), disregards that methods for F

- and G are identical and G could equally well be measured without an enclosure if measurement of L is allowed at all.
- EPA has stated that traditional l/g remains particularly appropriate for operations like can coating that use very few VOC containing liquids.
 - Accuracy gains are marginal
 - EPA error table asserts 14.3% error for traditional l/g, 1.6% for TTE
 - Assuming worst-case probable error, traditional l/g already provides 85.7% CE measurement accuracy level. Only talking about measuring the last 12.7%.
 - Traditional l/g actually provides a 92% CE measurement accuracy range (i.e., 8% probable error) for can coating due to solvent types, industry accuracy in measuring V. This probable error could likely be reduced more with VASE.
 - EPA is attempting to improve CE measurement by no more than 6.4%-12.7%, at costs as much as \$122,199 per line.
 - Since fugitives are at most 10% of VOC emissions on average from can coating operations (now less for many lines due to low solvent technology), EPA's TTE technique would fail to accurately measure .16% of total VOC emissions from coating lines, while traditional l/g would fail to accurately measure .8% to 1.4% of total VOC emissions from can coating lines.
 - Guidance asks can industry to spend \$122,199 per line to more accurately measure .6% to 1.2% of total VOC emissions from can coating lines. Questionable, even if EPA were attempting to control, not just measure, such a small amount of total VOC emissions.
 - Emissions, environmental gains at stake are marginal too.
 - In 1980, estimated annual uncontrolled emissions from can coating facilities were 150,000 TPY, or only 0.5% of estimated total nationwide VOC emissions. VOC fugitives from can coating lines were under .05% of nationwide inventory. Far less now due to industry contraction, increased low solvent, increased control, more VMTs.

- Stationary source VOCs are now only 20% of current nationwide inventory.
 - Mobile sources and NO_x, not VOCs, are the real ozone problem.
- EPA, industry resources at this margin far better spent elsewhere, given other pressing requirements.

VI. Policy Concerns

- Inaccurately measured fugitive VOCs are tiny percent of total VOC emissions from can coating lines. It makes no sense to spend millions to increase slightly the precision of identifying these fugitives, where reasonable alternatives are available.
 - On a per line basis the TTE 24-hour test costs the can industry up to \$122,199 to quantify insignificant unmeasured VOC emissions. Industry-wide, based on 370 can lines, one such test could cost as much as \$45 million.
- Handwritten note:* Can Coating Lines Test Costs
- EPA's 1979 CTG indicated VOC capital control costs of \$125,000-\$162,000, or \$135-\$706 per ton. Updating capital costs to \$200,000- \$300,000 suggests total costs of a one-time TTE test are 41% to 61% of the capital costs of control; 20 times more than the cost of the hood whose performance the test measures.
 - If fugitives in this industry are 15,000 TPY, assuming 15% (1350 TPY) are currently unmeasured by traditional l/g (worst-case), c/e to measure is \$45mm ÷ 1350 or over \$33,000/ton.
 - No environmental gains occur, since this is only a → $\frac{45 \text{ mm}}{15000} = 3000$ measurement method.
 - It makes no sense to mandate these costs when less intrusive, less expensive and adequately accurate methods are available.

VII. Policy Solutions

- Issue best resolved at federal level, not in state-by-state SIP proceedings entailing large agency resources and delays of other SIP revisions, where viable alternatives are available.

- Vehicles exist for generic resolution in amended guidance, national RACT "default" model rules for this process.

PROPOSED RESOLUTIONS

(1) **Single solvent mass balance.** This would essentially replicate conditions under which simplified liquid/gas mass balance has been accepted by EPA even for new lines not involving retrofits, where single solvents are involved. Can coaters would generally be authorized to perform conventional liquid/gas mass balances as follows:

A. Use a special single solvent test coating representing worst-case VOC emissions (e.g., lowest flash point). The FID for the gas portion of the test will be calibrated to this solvent. This will determine "G" improved.

B. Use a simple Method 24 for determining VOC content of the coating and weighing of coating used. This will determine "L" improved.

C. Determine capture efficiency as:

$$\text{CE improved} = \frac{\text{"G" imp}}{\text{"L" imp}}$$

This method will improve CE versus current mass balance methods. the coated sheets or can bodies run during the test would all be scrap, test durations should be no more than 1 hour to limit amount of scrap created.

(2) **Improved traditional mass balance.** CMI members will pay for an expedited study to quantify the actual probable error for traditional l/g in this industry, employing all valid accuracy improvements available. CMI members are then prepared to conduct improved one-hour mass balance tests with increased frequency -- say, one per year on representative lines within a plant. This approach is supported by EPA's conclusion, in its 6/89 draft CE guidance, that traditional liquid/gas mass balance without enclosures may remain especially appropriate for can coating lines.

(3) If for some reason these threshold proposals are not acceptable, CMI proposes the following:

CMI will pay for an expedited study quantifying the accuracy differentials between improved l/g mass balance and l/g TTE for can coating lines. CMI will accede to study results -- and treat demonstrated differentials as running solely against it rather than both ways (i.e., as -, not \pm) -- provided reasonable compliance flexibility is allowed by either:

*See Q. 10
1/15/10*

- permitting use of liquid/gas mass balance and making up the demonstrated error differential between liquid/gas and TTE through pollution prevention measures, to solve any fugitive emissions problems by more cost-effective means; or
- making up the error differential through external bubbles (e.g., voluntary fleet controls, NO_x reductions, or purchase of credits).

(4) CMI requests interim relief through suspension of the guidance and any enforcement actions against its members until completion of any necessary studies.

(5) Proposals not mutually exclusive (e.g., bubble options could be applied to (2)).

Appendix A

Cost Estimates

1. **Assumptions:** Typical 6 lines per room or plant. Plant runs 1 shift per day 5 days per week. Lost production values derived from MRI study at American National Can. MRI used \$1,268 per hour. That 1989 figure was conservatively increased by 6% to account for inflation, producing a current figure of \$1,344 per hour. Three 8-hour tests will take four days to run, conservatively assuming no increased downtime, but allowing for increased engineering adjustment time due to larger TTE. TTE is in place until 24 hours of valid tests are completed.
2. **Production Loss Analysis:** Single-line TTEs (with operator inside) would be less expensive since a multi-line TTE (with operator inside) requires shutdown of all other lines while each line is tested. (Five lines shut down for four day test = 20 line days per line tested X 6 lines = 120 line days lost production). CMI conservatively assumes each single-line TTE could be built over one weekend, with no lost production. A single line TTE will generally require shutdown of each neighboring line. In a six line room, tests on 4 lines will shut down two neighboring lines, which gives 4×8 lines = 32 line days. Tests on two end lines will each shut down 1 line = 4 days x two lines = 8 line days. Total shutdown is 38 line days, over the course of six weeks. $\$1,344$ per hour x 8 hour day = \$10,752 in production losses per line day x 38 line days = \$408,576 in production losses for the plant, and \$68,096 per line tested.
3. **TTE Cost Analysis:** Based on 12/6/92 letter, Appendix A, TTE test figures. Since the TTE must be larger at both front-end and lengthwise to allow operator inside, 25% was added to construction costs. Construction costs were $\$14,826 \times 25\% = \$18,532$. Although this must be done for six lines, some costs such as engineering and materials will be less (but not eliminated) for each additional line. For six lines, we conservatively estimate construction costs will be

halved. $\$18,532 \times 3 = \$55,596$ for six lines or $\$9,266$ construction costs per line. Testing costs were $\$44,841$ per line. Total test costs are thus conservatively estimated at $\$54,103$ per line. Add production losses in (2) above for a total cost per line of $\$122,199$.

● **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. Robert M. Lanham, Enr 59 Anheuser-Busch Co., Inc Executive Office One Busch Place St. Louis, MO 63118	4. Article Number P 832 539 793
5. Signature — Addressee X	Type of Service: <input 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
6. Signature — Agent X	Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
7. Date of Delivery 6-14-91	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989

★ U.S.G.P.O. 1989-238-815

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Certified Mail Receipt
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Return Receipt Showing to Whom & Date Delivered	
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PS Form 3800, June 1990

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Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

Mr. Robert M. Lanham, Environmental Engineer
Anheuser-Busch Companies, Inc.
Executive Office
One Busch Place (202-4)
St. Louis, Missouri 63118

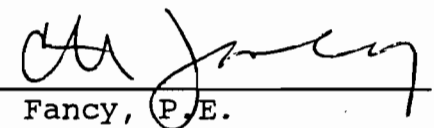
June 10, 1991

Enclosed is construction permit AC 16-187863 to construct/modify can coating lines Nos. 1, 2, 3, and 4. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this 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 permit 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

Copy furnished to:

Andrew G. Kutyna, DER
John H. Schamburg, P.E.
Darrel J. Hall, BESD
Ready File } 6-10-91 RA
Teresa Houston }

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of buisness on 6-10-91.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kim J. Ober
Clerk

6-10-91
Date

Final Determination

Anheuser-Busch Companies, Inc.
Metal Container Corporation
Duval County
Jacksonville, Florida

Can Coating Lines Nos. 1, 2, 3 and 4

Permit Number: AC 16-187863

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

May 31, 1991

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct/modify can coating lines Nos. 1, 2, 3, and 4 at the Anheuser-Busch Companies, Inc. facility in Jacksonville, Duval County, Florida, was distributed on February 22, 1991. The Notice of Intent to Issue was published in Florida Times-Union on March 6, 1991. Copies of the evaluation were available for public inspection at the Department's Tallahassee and Northeast District offices and the Duval County Department of Health, Welfare & Bio-Environmental Services office.

Comments were submitted on the Department's Intent to Issue the permit by Mr. Dean E. Pusch, Senior Environmental Scientist with Anheuser-Busch and Mr. Ron Roberson, Associate Engineer with BESD. Mr. Pusch requested clarification regarding the specific conditions of the permit and minor corrections within the Technical Evaluation and Preliminary Determination. Mr. Pusch's comments are as follows:

COMMENT: Specific Condition No. 11 - Line No. 1 production should read "10% of 16 oz. cans sizecoated."

RESPONSE: Specific Condition No. 11 will be corrected as requested.

Present Specific Condition No. 11

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

Line No. 1 production: 1050 cans per minute
90% of 16 oz cans basecoated
10% of 10 oz cans sizecoated
50% of 12 oz cans basecoated

Line No. 2 production: 1400 cans per minute
All 12 oz cans
No basecoated cans

Line No. 3 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

Line No. 4 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

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

New Specific Condition No. 11

The permitted materials and utilization rates are as stated in the application. The following parameters shall not be exceeded:

Line No. 1 production: 1050 cans per minute
90% of 16 oz cans basecoated
10% of 16 oz cans sizecoated
50% of 12 oz cans basecoated

Line No. 2 production: 1400 cans per minute
All 12 oz cans
No basecoated cans

Line No. 3 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

Line No. 4 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

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

COMMENT: Specific Condition No. 12 - Testing has been performed on the existing VOC control system at the plant. Thus, MCC requests that the permit condition be modified to require capture efficiency determination on the equipment/control system that is being modified, since data is currently available for those portions of the facility that won't be changed.

RESPONSE: The Department agrees with Mr. Pusch's rationale. However, in order to demonstrate subsequent annual compliance, the Department requires that the Company submit a protocol indicating the testing procedures to the BESD of Duval County for prior approval before applying for an operating permit for this facility. Specific Condition No. 12 will be modified as follows:

Present Specific Condition No. 12

Compliance with the VOC standards 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 and the BESD 45 days in advance of the Method and/or protocol selected.

New Specific Condition No. 12

Compliance with the VOC standards 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 or the BESD of the Method and/or protocol selected for prior approval before applying for an operating permit.

COMMENT: Specific Condition No. 18 - The condition, as written, requires Method 24 test results on the VOC content of any change in coatings/solvents. MCC proposes that the use of supplier certified analysis of VOC content be added to the condition as an alternative means of determining VOC content of any new coatings/solvents. This approach is consistent with the methodology required by the Department as the means to determine RACT compliance in Specific Condition No. 14.

RESPONSE: Specific Condition No. 18 will be modified as follows:

Present Specific Condition No. 18

At the request of the BESD or the Department, the permittee shall conduct an EPA Method No. 24 analyses on any coating solvent or waste solvent specified. The use of a different coating requires prior written notification. Notification shall be provided to the BESD and shall include EPA Method 24 test results on the VOC content of the proposed coating and solvent.

New Specific Condition No. 18

At the request of the BESD or the Department, the permittee or the coating manufacturer shall conduct an EPA Method No. 24 analyses on any coating, solvent or waste solvent specified. 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 coatings supplied by a different manufacturer shall be tested for VOC content using EPA Method 24 and 24A or the above mentioned Appendix B prior to initial use in production. Each coating shall be tested after it is diluted with the maximum amount of solvent used by the permittee for production. The use of a different coating with a higher than permitted RACT or LAER VOC content 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 BESD and shall include EPA Method 24 or Appendix B test results on the VOC content of the proposed coating and solvent.

COMMENT: Specific Condition No. 20 - Releases at the facility are required to be reported under other regulations, e.g., CERCLA/SARA. Copies of any reports required by these regulations will be submitted to the BESD.

RESPONSE: Specific Condition No. 20 will be deleted since it is already reported under other regulations.

Specific Condition No. 20

FROM:

If any spills, leaks, excess emissions, etc., occur at this facility, the BESD office shall be notified no later than the next normal business day.

TO: This condition will be deleted.

COMMENT: Specific Condition No. 26 - This condition, as written, requires reporting of VOC emissions in tons/year, pounds/day, and pounds/hour. These units are inconsistent with the units of the permit limits set out in Specific Conditions 1, 3, 4, and 5, which are tons/year, tons/month, and tons/day. MCC requests that Condition No. 26 be changed so that the recordkeeping units are consistent with the emission limit units in Conditions 1, 3, 4, and 5.

RESPONSE: Specific Condition No. 26 will be modified as follows:

Present Specific Condition No. 26

Pursuant to F.A.C. 17-2.210(2) Air Operating Permits, the permittee is required to submit annual reports on the actual operating rates and emissions from the facility. These reports shall include but are not limited to the following: utilization rates (lbs/yr) manufacturer's certifications, VOC emissions (tons/yr, lbs/day, and lbs/hr), test results, VOC emissions per line, VOC content, liquid waste disposed, hours of operation, fuel utilization, quantity of cans processed, etc. Annual reports shall be sent to the BESD office.

New Specific Condition No. 26

Pursuant to F.A.C. 17-2.210(2) Air Operating Permits, the permittee is required to submit annual reports on the actual operating rates and emissions from the facility. These reports shall include but are not limited to the following: utilization rates (lbs/yr) manufacturer's certifications, VOC emissions (tons/yr, tons/day, and tons/hr), test results, VOC emissions per line, VOC content, liquid waste disposed, hours of operation, fuel utilization, quantity of cans processed, combustion temperature, destruction and capture efficiency, etc. Annual reports shall be sent to the BESD office.

COMMENT: Specific Condition No. 27 - File records show that the proposed permit would replace operating permits AO 16-164835, AO 16-134410, AO 16-141580, and AO 16-141581.

RESPONSE: This condition will not be changed since it refers to the original construction permits issued for these can coating lines. The Department acknowledges that the proposed permit (AC 16-187863) will also cause the replacement of operating permits AO 16-164835, AO 16-134410, AO 16-141580, and AO 16-141581, since a new operating permit will be issued for this facility.

COMMENT: Section II.2 of Technical Evaluation and Preliminary Determination - The appropriate SIC code for the facility is 3411, Metal Cans.

RESPONSE: This page will be changed to reflect the correct SIC code for this facility.

COMMENT: Section V.1 of Technical Evaluation and Preliminary Determination - The second paragraph should read, "The largest portion of the VOC emissions will result from butyl cellosolve and n-butyl alcohol, which are components of the coatings."

RESPONSE: This page has been replaced as requested.

Regarding Mr. Roberson's comments, the Department offers the following clarification:

COMMENT: Emission Limits - The Air Resource Division (ARD) of Duval County requests that the specific conditions referencing allowable emissions specify whether the allowable emissions are stack emissions only or total emissions generated by each coating line.

Determining compliance for stack emissions only would require testing of the stack exit.

Determining compliance for total emissions would require capture and destruction efficiency testing. If this is required, ARD recommends that the permit also provide applicable limitations for minimum capture and destruction efficiencies.

ARD recommends that the procedure listed in Specific Condition 14 (45 FR 80824) be attached to the permit for ready reference.

RESPONSE: Allowable emissions for each coating line are total emissions for that line. This includes emissions from the paint coatings, solvents, fugitive emissions, etc. Specific Conditions Nos. 1, 3, 4, and 5 will be modified to include the word total in each condition as follows:

1. Maximum total VOC emissions for Can Coating Line No. 1 shall not exceed 0.10 tons/day, 3.0 tons/month and 34.5 tons/year.
3. Maximum total VOC emissions for Can Coating Line No. 2 shall not exceed 0.30 tons/day, 9 tons/month and 109.9 tons/year.
4. Maximum total VOC emissions for Can Coating Line No. 3 shall not exceed 0.32 tons/day, 9.6 tons/month and 115.7 tons/year.
5. Maximum total VOC emissions for Can Coating Line No. 4 shall not exceed 0.32 tons/day, 9.6 tons/month and 115.7 tons/year.

In addition, a minimum limitation will be required for the capture and destruction efficiency. Specific Condition No. 10 will be modified to include this limitation as follows:

Present Specific Condition No. 10

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

New Specific Condition No. 10

The operating requirements for the four can lines are:

- A. A 90% minimum destruction efficiency.
- B. An 80% minimum capture efficiency.
- C. An operating time of 8760 hours per year.

COMMENTS: Compliance Determination - MCC operates four (4) coating lines utilizing two (2) thermal oxidizers as emission control devices. To determine compliance, will each coating line be required to demonstrate individually that the allowable emissions rates are achieved or will collective emissions testing results be acceptable as demonstration of compliance?

The Air Resources Division (ARD) recommends destruction efficiency testing on each thermal oxidizer in combination with a mathematical determination of the capture efficiency by recordkeeping of coatings applied during the testing period. ARD finds collective testing acceptable if all four (4) units are operating at 90-100% as described by the permit and permit application.

RESPONSE: In order to determine compliance with the required emission limitations, collective emissions testing (total emissions from the entire facility) will be acceptable as demonstration of compliance for this facility. It should be noted that Coating Lines Nos. 2, 3, and 4 shall also comply with RACT regulations, F.A.C.

Rule 17-2.650(f)(1), which allows for a daily emissions facility-wide compliance (see attached 45 FR 80824). However, it appears it will be beneficial to the company to demonstrate compliance line by line if they are planning future modifications for any line and they will want credit for emission reductions, offsets, etc. per line. Coating Line No. 1 is the only line that will require a separate stack test, since it is a requirement of the NSPS-Subpart WW, and a LAER determination setting emission limits was conducted for this line. As indicated before, the company shall submit protocol and testing procedures to the Department and/or BESD for prior approval before applying for an operating permit.

The Department made minor changes in Specific Condition No. 19. This condition will be modified as follows:

Present Specific Condition No. 19

When the Department or the BESD, after investigation, has good reason (such as complaints, increased visible emissions, etc.), to believe that any applicable emission standard contained in F.A.C. Chapter 17-2, 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 air pollutant emissions from the source and to provide a report on the results of said tests to the Department.

New Specific Condition No. 19

When the Department or the BESD, after investigation, has good reason (such as odor complaints, increased visible emissions, excess emissions, etc.), to conclude that any applicable emission standard contained in F.A.C. Chapter 17-2, or in this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of air pollutant emissions from the facility and to provide a report on the results of said tests to the Department.

The final action of the Department will be to issue construction permit AC 16-187863 with the changes as indicated in this Final Determination.

I. SYNOPSIS OF APPLICATION

I.1 Applicant Name and Address

Anheuser-Busch Companies, Inc.
Metal Container Corporation
1100 North Ellis Road
Jacksonville, Florida 32206-6257

I.2 Reviewing and Process Schedule

Date of Receipt of Application: October 11, 1990.

30 Days Completeness Review: November 10, 1990.

Additional Information Received: November 29, 1990.

Application Completeness Day: November 29, 1990.

II. FACILITY INFORMATION

II.1 Facility Location

Metal Container Corporation is located at 1100 North Ellis Road in Jacksonville, Duval County, Florida. The UTM coordinates are zone 17, 428.440 km East and 3356.377 km North.

II.2 Standard Industrial Classification Code

This facility is classified as follows:

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

Group No. - 341 Metal Cans 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). The total VOC permitted emissions for this facility was 403.5 tons per year. The proposed project will reduce plant-wide emissions by 27.5 tons per year. The total permitted emissions for this facility shall not exceed 376 tons per year.

III. PROJECT DESCRIPTION

As a result of the numerous changes that have occurred at this facility since 1981, a new construction permit (covering all

lines) will be issued. This permit will indicate all the modifications that have taken place at this facility during the time period comprising the years 1981-1991. Total plant-wide emissions will be reduced by 27.50 tons per year. The latest modification (year 1990) will include internal changes to line No. 1 and line No. 2. These proposed changes include the following:

Line No. 1

1. Dismantle and remove the existing basecoater and basecoater pin oven.
2. Relocate the inside spray machines and respray machine to the second floor near the inside bake oven. This will reduce the distance the can travels from the sprayer to the oven and thereby reduce fugitive emissions.
3. Can bodies will be routed to the current Line 2 basecoater and basecoater pin oven. This will become the line 1 basecoater and basecoater pin oven. However, this equipment will not be moved from its present location.
4. The existing printer will be able to produce 16 oz cans at 1000 CPM and 12 oz cans at 1050 CPM.

Line No. 2

1. The basecoater and basecoater pin oven will be connected to Line No. 1 (i.e., Line 2 will no longer have the capability to produce basecoated cans).

Additionally, the basecoaters and basecoater pin oven exhausts on Line Nos. 3 and 4 will be ducted into thermal oxidizer #2 to further reduce emissions.

Present Plant Layout

Attachment A is a diagram showing the plant configuration and the ducting to the thermal oxidizers when the permits to operate were issued (1988).

Attachment B is a diagram showing the plant configuration and ducting to the thermal oxidizers after these proposed changes are completed. This diagram also includes all modifications accomplished at the facility (1981-1991).

III.1 Background Information.

The following is a list of the chronological activities that have occurred at the plant since 1981.

- o 1981 - The plant switched to water based coating technology. The Department determined this year to be the

baseline date for contemporaneous increases or decreases. Actual emissions of 315.5 TPY plus RACT credit of 48.0 TPY formed the baseline of 363.5 TPY. Previously, the plant used solvent-based coatings and controlled VOC by thermal oxidation. Application renewals for operating permit were submitted and permits to operate were issued on October 29, 1981 (AO 16-44656, 57, 58 and 59). Applications to construct overvarnish units on Can Coating Lines 1 and 2 were submitted on November 18, 1981.

- o 1982 - Permits to construct (overvarnish) on Can Coating Lines 1 and 2 were issued (AC 16-50417, 18). These permits allowed Can Coating Lines 1 and 2 the use of overvarnish on the outside surface of white basecoating cans in order to increase the can thickness to alleviate abrasions problems encountered during shipping of the product. Emissions level increase of 45.1 tons per year VOC was subject to limited new source review requirements contained in F.A.C. Rule 17-2.510(3)(a)1.a.(ii).

Certificates of Completion of Construction were submitted on April 23, 1982, for AC 16-50417, 18. Permit to operate the overvarnish unit on Lines 1 and 2 were issued (AO 16-55208, 10). They expired on May 31, 1987.

Applications to construct overvarnish units on Can Coating Lines 3 and 4 were submitted on July 1, 1982. These lines were permitted for the addition of a roll coating unit to the existing dry offset lithography unit. Permits to construct (overvarnish) on Can Coating Lines 3 and 4 were issued (AC 16-57752, 53). Total plant emissions were limited to 403.5 tons of VOC per year to avoid a significant net emissions increase. Certificates of Completion of Construction were submitted for AC 16-57752 and -57753 on October 21, 1982. Permits to operate Can Coating Lines 1, 2, 3, and 4 (AO 16-55208, -62285, and -62287), including overvarnish units on all lines, were issued on December 1, 1982, and expired on May 31, 1987.

- o 1984 - Necker/Flanger Lube Reduction.

- o 1985 - Request to modernize line speeds from 950 to 1,400 can per minute for Can Coating Lines 2, 3, and 4. Can Coating line No. 1 was to remain as a back-up line. Actual emissions were projected at less than 403.5 tons VOC per year, so no significant emission increase occurred.

- o 1986 - Specific Conditions 2 and 4 of Construction Permit Nos. AC 16-57752 and -57753 were modified to reflect modernized lines. On August 18, 1986, MCC requested to reinstate Line No. 1 from a standby to a full-time basis and to increase the speed of the line to 1,000 cans per minute. The overvarnish and bottom varnish operations from the three modernized lines were ducted to the line thermal oxidizer No. 2 in order to

provide an offset of 45.7 tons per year. The application was submitted on November 26, 1986. On September 30, 1986, MCC requested approval of a schedule for start-up and emissions testing of thermal oxidizer Nos. 1 and 2. This request was approved on October 6, 1986.

o 1987 - Additional information received on January 21, 1987, for the modification of Can Coating Line No. 1. On January 22, 1987, the schedule for start-up and emission testing program was extended from February to April 1987. On February 6, 1987, MCC requested approval to begin installation of the necessary duct work to vent the three basecoater oven exhausts to the existing thermal oxidizer. This request was approved on March 4, 1987. On March 30, 1987, the schedule for start-up and emission testing program was extended from April 1, 1987, to October 1, 1987. On July 21, 1987, a permit was issued for Can Coating Line No. 1. On October 22, 1987, a request to extend the expiration date to July, 1988 of permit AC 16-127873 was approved.

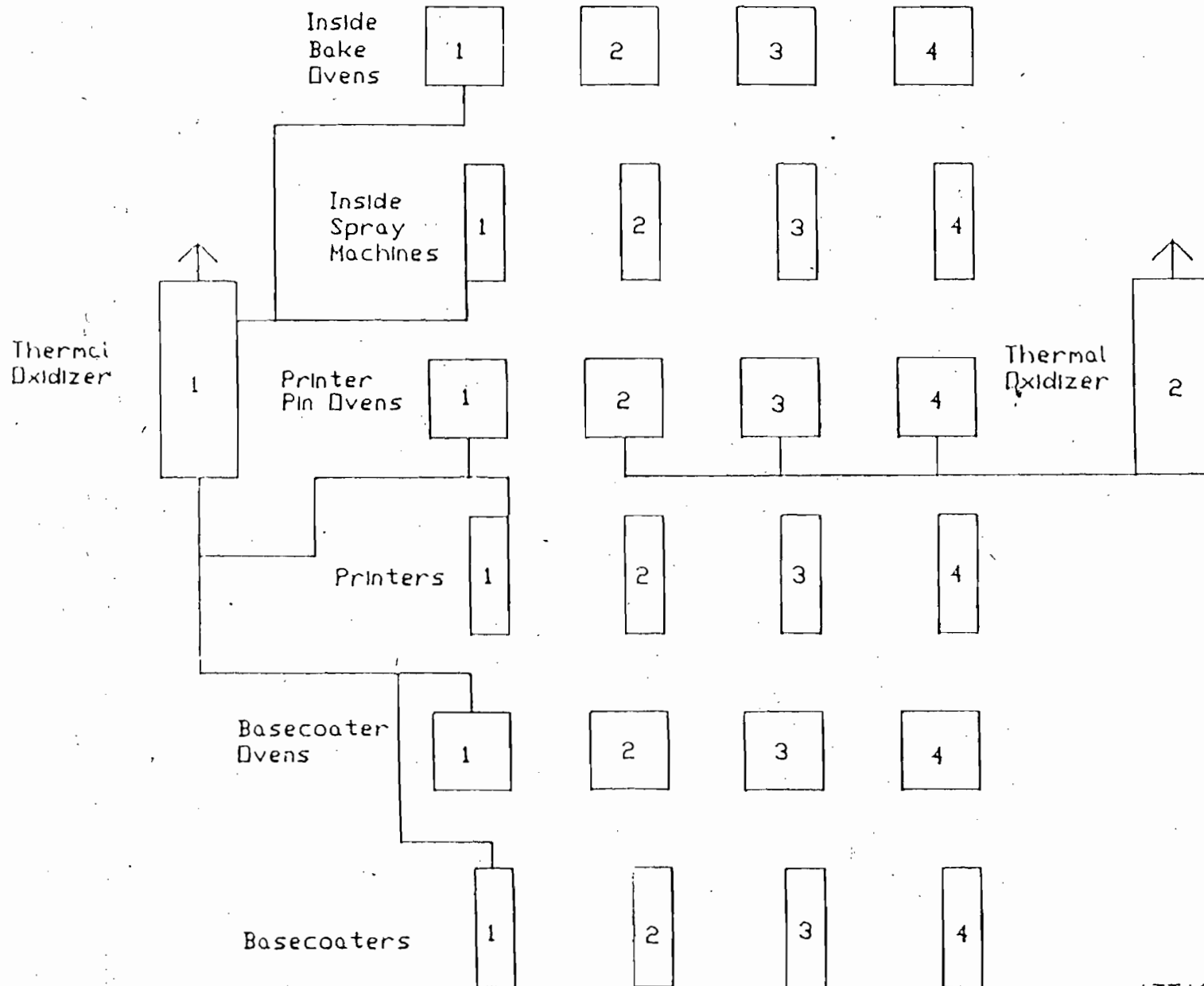
o 1988 - On March 8, 1988, a request to include the respray machine and to increase the maximum daily emissions for Can Coating No. 1 to 0.19 tons was approved. On April 8, 1988 a request to extend the expiration of permit No. AC 16-127873 to October 1, 1988, was approved. The company was finalizing connection of the duct work from the inside respray machine into T.O. No. 1, and the stack test was pending. On October 5, 1988, a request to extend the expiration date of permit AC 16-127873 was approved in order for the company to complete engineering modifications to improve capture efficiency and the required source test.

o 1989 - On April 20, 1989, a letter was received explaining the company's effort to improve capture and destruction efficiencies. On June 20, 1990, a letter was received from the BESD, which included Anheuser-Busch's letters of May 4, 1990, and September 22, 1989. The Company's letter dated May 4, 1990, was to request permit AC 16-127873 be modified to reflect some internal changes proposed. The Company's letter dated September 22, 1989 was to request amendment of operating permits AO 16-164835, 16-134410, 16-141581 and 16-141580.

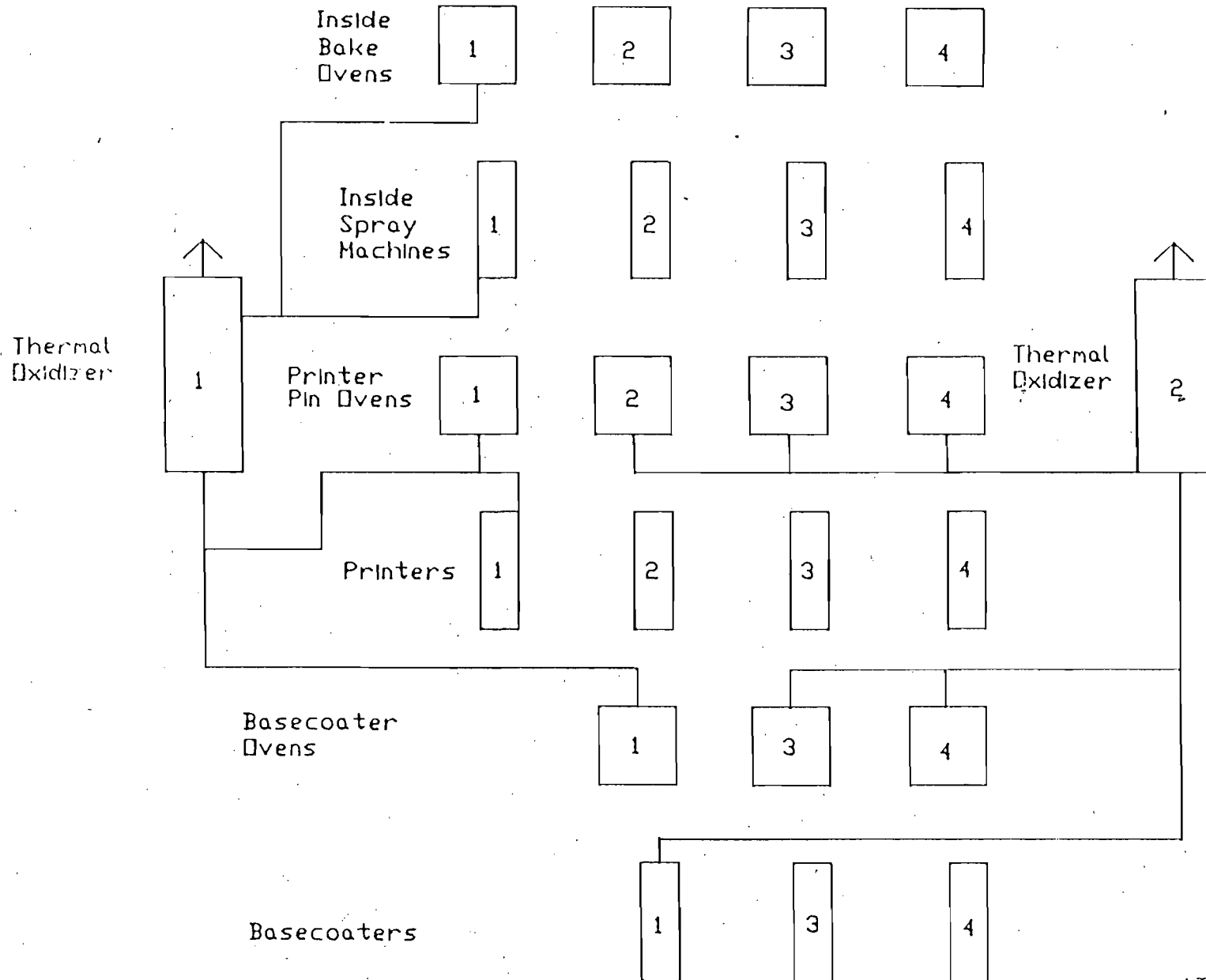
o 1990 - On July 24, 1990, the BAR responded to Anheuser-Busch requesting the Company to submit a complete application for permit to construct Can Coating Lines No. 1, 2, 3, and 4. On October 11, 1990, the Company submitted an application requesting internal changes to Lines No. 1 and 2, including the facility's modifications.

o 1991 - Permit No. AC 16-187863 (current proposal). This permit will incorporate all modifications performed at the facility for the last ten years.

METAL CONTAINER CORPORATION JACKSONVILLE, FLORIDA



METAL CONTAINER CORPORATION JACKSONVILLE, FLORIDA



A summary of the annual VOC emissions is shown below:

<u>Year</u>	<u>Allowable VOC Emissions (TPY)</u>
1980	366.3
1981	315.5
1982	363.5
	403.5
1983-86	403.5
1987-90	400.3
1991	376.0

IV. 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 is located in an area (Duval County) currently designated nonattainment for ozone.

In 1987 a modification to Can Coating Line No. 1 was reviewed under F.A.C. Rule 17-2.510, New Source Review (NSR) for nonattainment areas. F.A.C. Rule 17-2.510 did not require the full nonattainment new source review since an overall net reduction of emissions (45.7 TPY) from the facility was expected. However, federal rules (netting individual units in a nonattainment area) required the application of LAER. Therefore, it was determined that the application of thermal oxidizers to control emissions from Can Coating Lines No. 1 (thermal oxidizer No. 1) 2, 3, and 4 (thermal oxidizer No. 2) in conjunction with low solvent technology was LAER. This LAER determination assured compliance with both state (F.A.C. Rule 17-2.510) and federal rules (40 CFR 51, Vol. No. 233, Emissions Trading Policy Statement).

Metal Container Corporation proposed the use of waterborne coatings and incineration of the VOC emitted from the three ovens as LAER determination for this facility. A detailed description of the LAER determination done in 1987 is attached.

The modification of Can Coating Line No. 1 increased emissions by 42.5 tons of VOC per year. The overall project, reinstating Can Coating Line No. 1 from stand-by to a full time basis and ducting the overvarnish and bottom varnish operations from the three modernized lines to thermal oxidizer No. 2, provided a contemporaneous emissions decrease of 45.7 tons of VOC per year. A net emissions decrease of 3.2 tons of VOC per year occurred at this facility in 1987.

Presently, this facility is being reviewed in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment

requirements. A net emission decrease of 27.5 tons per year is expected as a result of this project. Permitted emissions for this facility shall not exceed 376 tons per year.

This facility shall comply with F.A.C Rule 17-2.650(1)(f)(1), Reasonably Available Control Technology (RACT) for Can Coating Operations; F.A.C Rule 17-2.620, General Pollutant Emission Limiting Standards; F.A.C. Rule 17-2.640, Lowest Achievable Emission Rate (LAER); New Source Performance Standard for Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW, and F.A.C Rule 17-2.700, Emission Test Procedures.

V. SOURCE IMPACT ANALYSIS

V.1 Emission Limitations

The operation of the can coating facility will produce emissions of volatile organic compounds to the atmosphere.

The largest portion of the VOC emissions will result from methyl ethyl ketone, methyl chloroform and butyl cellosolve, which are components of the coatings.

The following summary shows the permitted emissions for this facility. These permitted emissions are in compliance with all applicable requirements of F.A.C. Rule 17-2 and New Source Performance Standards for Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW.

Emissions Summary Volatile Organic Compounds Allowable Emissions

The permitted emissions for the whole plant are 1.1 tons of VOC per day, 31.2 tons of VOC per month, and 376 tons of VOC per year.

Maximum permitted emissions for Can Coating Line No. 1 shall not exceed:

White Basecoat	1.77 lbs VOC/gal - H ₂ O
Bottom Varnish	1.92 lbs VOC/gal - H ₂ O
Over Varnish	2.29 lbs VOC/gal - H ₂ O
Inside Spray	3.62 lbs VOC/gal - H ₂ O

The RACT regulations for this can coating facility (Can Coating Lines Nos. 2, 3, 4) are as follows:

- A) 2.8 pounds per gallon of coating (0.34 kilograms per liter), excluding water, delivered to the coating applicator of;

- (a) Sheet basecoat (exterior and interior) and overvarnish,
or
 - (b) Two-piece can exterior (basecoat and overvarnish)
operation.
- B) 4.2 pounds per gallon of coating (0.50 kilograms per liter), excluding water delivered to the coating applicator from two- and three-piece can interior body spray and two-piece can exterior end (spray or roll coat) operations.

Compliance for each coating line shall be determined as follows:

For any 24-hour period, the total actual VOC emissions shall be calculated from daily units of production records (e.g., number of each type of can, sheet, etc.), application rates of each coating (e.g., gallons/units of production), solvent and solids content of each coating, and control efficiency. This would then be compared to the total allowable emissions for that production mix to verify each coating complied with applicable RACT emission limitations.

On an annual basis, compliance with the VOC emission rate from thermal oxidizers Nos. 1 and 2 shall be determined by EPA Reference Methods 25 or 25A, or any other method approved by the Department. Can Coating Line No. 1 shall comply with the attached Lowest Achievable Emission Rate (LAER) determination. Reporting and recordkeeping requirements shall be as described in 40 CFR 60.495, NSPS for Beverage Can Surface Coating Industry, Subpart WW.

V.2 Air Quality Analysis

From a technical review of the application, the Department has determined that the modification and operation of these sources will not have an adverse/significant impact on Florida's ambient air quality standards.

V.3 Air Toxics Information

Currently, the Department is developing acceptable ambient concentrations for toxic substances. Specifically, sources classified as Category A (carcinogens and highly toxic) and Category B (moderately toxic substances).

In the event toxic emission limits are set during the term of this permit or any subsequent permit which are different than the permitted emissions, the Department may seek modification pursuant to F.A.C. Rule 17-4.08.

VI. CONCLUSION

Based on the information provided by Anheuser-Busch Companies, Inc., the Department has reasonable assurance that the proposed construction/modification of Can Coating Lines Nos. 1, 2, 3 and 4, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

Barry D. Anderson
36024
2-21-91

Lowest Achievable Emission Rate (LAER) Determination
Metal Container Corporation
Duval County

The applicant has submitted a request to reinstate can line No. 1 from a standby to a full-time basis, with the line speed being increased to 1,000 cans per minute. The can line, which will apply the coatings to beer and soft drink cans, is scheduled to operate continuously 8,760 hours per year.

The Metal Container Corporation is located in Duval County, which is currently designated nonattainment for the pollutant ozone, Rule 17-2.410(1), FAC. The proposed reinstatement of can line No. 1 will result in an increase of 42.5 tons of volatile organic compounds (VOCs) per year. VOCs are considered to be precursors to ozone, thus the modification of can line No. 1 is subject to a LAER determination as set forth in Rule 17-2.510, FAC, New Source Review (NSR) for nonattainment areas. In accordance with the provisions of the NSR rule for nonattainment areas, the overvarnish and bottom varnish operations from three existing lines will be ducted to thermal oxidizers to provide an offset of 45.7 tons of VOCs per year.

Date of Receipt of LAER Application:

January 21, 1987

Review Group Members

This determination was based upon comments received from the Stationary Source Control Section.

LAER Determination by DER:

Pollutant	Emission Limit
Ozone (VOC)	Emissions limited by using a combination of low solvent water-borne coatings* and catalytic oxidation of emitted VOC vapors.

*VOC content of solvents shall be limited to the following:

White Basecoat	-	1.77 lbs VOC/gal - H ₂ O
Bottom Varnish	-	1.92 lbs VOC/gal - H ₂ O
Over Varnish	-	2.29 lbs VOC/gal - H ₂ O
Inside Spray	-	3.62 lbs VOC/gal - H ₂ O

LAER Determination Rationale:

The procedure for determining LAER is set forth in Rule 17-2.640, FAC. In accordance with this procedure, the determination of LAER shall not allow the modified source to emit any affected pollutant in excess of the amount allowable under any applicable Environmental Protection Agency Standard of Performance for New Stationary Sources (NSPS) promulgated pursuant to 40 CFR Part 60.

The coating of beverage cans is regulated under Subpart WW of NSPS. In accordance with this regulation, VOC emissions are limited to 0.29 kilogram per liter of coating solids for exterior base coating operations, 0.46 kilogram per liter of coating solids for overvarnish coating operations, and 0.89 kilogram per liter of coating solids for inside spray coating operations. The applicant has indicated that the VOC emissions for the exterior base coating, overvarnish coating, and the inside spray coating operations are 0.28, 0.40, and 0.88 kilograms per liter of coating solids, respectively. These emission rates are less than the specified NSPS limitations and are thereby consistent with the LAER determination guidelines.

In addition to ensuring compliance with applicable NSPS, the Department, when preparing a LAER determination, shall give consideration to and make a determination that reflects: 1) information published by the USEPA including the BACT/LAER Clearinghouse, 2) the most stringent emission limitation which is contained in the implementation plan of any state, 3) the most stringent emission limitation which is achieved in practice, and 4) all scientific engineering, technical material, or other relevant information available to the Department.

The latest (May 1986) BACT/LAER Clearinghouse summary lists data for four facilities with can coating operations. Of the facilities listed, two of the listings had LAER determinations in which LAER was determined to be a 95% efficient thermal incinerator. One of these two facilities consisted of a 1,000 cans per minute line which is identical in throughput to the line proposed for this facility in Jacksonville. The LAER determination for the 1,000 cans per minute line listed in the BACT/LAER Clearinghouse had listed the VOC emissions as being 26.0 tons per year. The estimated emissions of the Jacksonville facility with the proposed LAER are 41.8 tons of VOCs per year, which would suggest that LAER is not being applied when compared to the facility with lower emission rate.

It is important to note, however, that the emission rate from the facility in Jacksonville has included the emissions for clean-up solvents, and the line will be coating 16 ounce cans instead of the smaller 12 ounce cans coated at the other facility. When these differences are taken into account, the LAER proposed for the Jacksonville facility is consistent with the LAER determinations for facilities permitted prior to this time.

The literature research indicates that the use of low solvent coatings in conjunction with thermal incineration of the VOC emissions represents LAER. The Department thereby agrees that the VOC emission limiting strategies for the No. 1 can coating line, as proposed by the applicant, is LAER.

Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

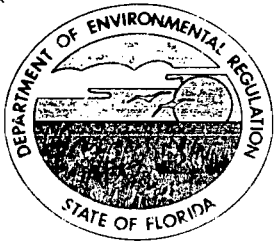
C. H. Fancy
C. H. Fancy, P.E., Deputy Chief, BAQM

Date: July 20, 1987

Approved by:

Dale Twachtman
Dale Twachtman, Secretary

Date: 7/22/87



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

PERMITTEE: Anheuser-Busch Companies, Inc.
Metal Container Corporation
1100 North Ellis Road
Jacksonville, FL 32206-6257

Permit Number: AC 16-187863
Expiration Date: November 30, 1991
County: Duval
Latitude/Longitude: 30°20'15"N
81°40'42"W
Project: Can Coating Lines Nos.
1, 2, 3 and 4

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 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 drawings, 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 Can Coating Lines Nos. 1, 2, 3 and 4 to be located at Jacksonville, Duval County, Florida.

The source shall be constructed 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. DER Form 17-2.202(1) Application to Construct Air Pollution Sources, received on October 11, 1990.
2. Additional Information received on November 29, 1990.

PERMITTEE:

Anheuser-Busch Companies, Inc.

Permit Number: AC 16-187863

Expiration Date: November 30, 1991

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: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863 Expiration Date: November 30, 1991

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: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863
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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. 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

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863
Expiration Date: November 30, 1991

GENERAL CONDITIONS:

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.

14. 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. Maximum total VOC emissions for Can Coating Line No. 1 shall not exceed 0.10 tons/day, 3.0 tons/month and 34.5 tons/year.

2. Can Coating Line No. 1 shall not discharge or cause the discharge of VOC that exceeds the following volume-weighted calendar-month average emissions:

- 0.28 Kilogram of VOC per liter of coating solids from each two piece can exterior basecoating operation, except clear basecoat.
- 0.40 Kilogram of VOC per liter of coating solids from each two-piece can clear basecoatings operation and from each overvarnish coating operation.
- 0.88 Kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operations.

PERMITTEE:

Anheuser-Busch Companies, Inc.

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SPECIFIC CONDITIONS:

3. Maximum total VOC emissions for Can Coating Line No. 2 shall not exceed 0.30 tons/day, 9 tons/month and 109.9 tons/year.

4. Maximum total VOC emissions for Can Coating Line No. 3 shall not exceed 0.32 tons/day, 9.6 tons/month and 115.7 tons/year.

5. Maximum total VOC emissions for Can Coating Line No. 4 shall not exceed 0.32 tons/day, 9.6 tons/month and 115.7 tons/year.

6. The VOC emissions from the following sources (Lines Nos. 2, 3 and 4) shall not exceed the following RACT standards:

A) 2.8 pounds per gallon of coating (0.34 kilograms per liter), excluding water, delivered to the coating applicator of;

(a) Sheet basecoat (exterior and interior) and overvarnish, or

(b) Two-piece can exterior (basecoat and overvarnish) operation.

B) 4.2 pounds per gallon of coating (0.50 kilograms per liter), excluding water delivered to the coating applicator from two- and three-piece can interior body spray and two-piece can exterior end (spray or roll coat) operations.

7. Total volatile organic compounds (VOC) and organic solvents emissions for the entire facility shall not exceed 1.1 tons/day, 31.20 tons/month and 376 tons/year.

8. Unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant (as listed in the MSDS submitted with the application) shall not exceed the concentration calculated by the following formula:

$$AAC = \frac{(OEL)}{\text{safety factor}}$$

where,

AAC = acceptable ambient concentration

PERMITTEE: Anheuser-Busch Companies, Inc. **Permit Number:** AC 16-187863 **Expiration Date:** November 30, 1991

SPECIFIC CONDITIONS:

Safety Factor = 50 for category B substances (8 hrs/day)
100 for category A substances (8 hrs/day)
210 for category B substances (24 hrs/day)
420 for category A substances (24 hrs/day)

OEL = Occupational exposure level such as ACGIH, OSHA,
and NIOSH published standards for toxic materials.

9. Visible emissions from this facility shall not exceed 20% opacity.

Operating Rates

10. The operating requirements for the four can lines are:

- A. A 90% minimum destruction efficiency.
- B. An 80% minimum capture efficiency.
- C. An operating time of 8760 hours per year.

11. The permitted materials and utilization rates are as stated in the application. The following parameters shall not be exceeded:

Line No. 1 production: 1050 cans per minute
90% of 16 oz cans basecoated
10% of 16 oz cans sizecoated
50% of 12 oz cans basecoated

Line No. 2 production: 1400 cans per minute
All 12 oz cans
No basecoated cans

Line No. 3 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

Line No. 4 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

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

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Anheuser-Busch Companies, Inc.

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SPECIFIC CONDITIONS:

Compliance Determination

12. Compliance with the VOC standards 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 and the BESD of the Method and/or protocol selected for prior approval before applying for an operating permit.

13. Compliance for Can Coating Line No. 1 shall be demonstrated in accordance with Subpart WW - Standards of Performance for the Beverage Can Surface Coating Industry - CFR 60.493. Performance test and Compliance Provisions and CFR 60.496 Test methods and Procedures. Reporting and recordkeeping requirements shall be as described in CFR 60.495.

14. Compliance with RACT regulations for Can Coating Lines Nos. 2, 3 and 4 shall be determined by the procedures described in 45 FR 80824: For any 24-hour period, compliance shall be based on total actual emissions calculated from daily units of production records (number of each type of can, sheet, etc.), application rates of each coating (gallons/units of production), and solvents and solids content of each coating. This will then be compared to the total allowable emissions for that production mix to verify each coating line complied with applicable emission limitations. The pounds of solvent per gallon of coating shall be based on a certified analysis of the VOC content of each coating given to the user by the supplier. This analysis must be verifiable by laboratory analyses.

15. Compliance with the V.E. standards for this facility shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources, as described in 40 CFR 60, Appendix A (July 1989). This V.E. test shall be performed during the VOC emission testing. The duration of the V.E. shall be at least 60 minutes.

16. The minimum requirements for stack sampling facilities, source sampling and reporting shall be in accordance with Rule 17-2.700, F.A.C. and 40 CFR, Appendix A (July 1989). Test results

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SPECIFIC CONDITIONS:

will be the average of 3 valid runs. This facility shall be operating between 90% and 100% of permitted capacity during the tests. The permittee shall notify the Duval County Bio-Environmental Services Division (BESD) office in writing at least 15 days in advance of the compliance test. Compliance test results shall be submitted to the BESD office no later than 45 days from the date of testing.

17. Compliance with the acceptable ambient concentrations (AAC) shall be demonstrated based on calculations certified by a professional engineer registered in Florida using actual operating conditions. Determination of the ambient concentration for organic compounds shall be determined by Department approval dispersion modeling. AAC calculations shall be made available upon request.

18. At the request of the BESD or the Department, the permittee or the coating manufacturer shall conduct an EPA Method No. 24 analyses on any coating, solvent or waste solvent specified. 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 coatings supplied by a different manufacturer shall be tested for VOC content using EPA Method 24 and 24A or the above mentioned Appendix B prior to initial use in production. Each coating shall be tested after it is diluted with the maximum amount of solvent used by the permittee for production. The use of a different coating with a higher than permitted RACT or LAER VOC content 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 BESD and shall include EPA Method 24 or Appendix B test results on the VOC content of the proposed coating and solvent.

19. When the Department or the BESD, after investigation, has good reason (such as odor complaints, increased visible emissions, excess emissions, etc.), to conclude that any applicable emission standard contained in F.A.C. Chapter 17-2, or in this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of air pollutant emissions from the facility and to provide a report on the results of said tests to the Department.

Rule Requirements

20. This facility shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapters 17-2 and 17-4, Florida Administrative Code.

PERMITTEE:

Anheuser-Busch Companies, Inc.

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Expiration Date: November 30, 1991

SPECIFIC CONDITIONS:

21. 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)).

22. 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 emissions control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

- maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;
- prevent excessive air turbulence across exposed VOCs;
- 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, valve lines, etc., shall be properly maintained; and,
- all VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

23. This facility is subject to applicable provisions of VOC-RACT Rule 17-2.650(1)(f)1-Can Coating Requirements, 40 CFR, 60, Subpart WW-NSPS for Beverage Can Surface Coating Industry, F.A.C. Rule 17-2.510-New Source Review Requirements, F.A.C. Rule 17-2.640-Lowest Achievable Emission Rate (LAER) and F.A.C. Rule 17-2.700-Emission Test Procedures.

24. 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). Objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to F.A.C. Rule 17-2.100(135).

PERMITTEE: Anheuser-Busch Companies, Inc. **Permit Number:** AC 16-187863 **Expiration Date:** November 30, 1991

SPECIFIC CONDITIONS:

25. Pursuant to F.A.C. 17-2.210(2) Air Operating Permits, the permittee is required to submit annual reports on the actual operating rates and emissions from the facility. These reports shall include but are not limited to the following: utilization rates (lbs/yr) manufacturer's certifications, VOC emissions (tons/yr, tons/day, and tons/hr), test results, VOC emissions per line, VOC content, liquid waste disposed, hours of operation, fuel utilization, quantity of cans processed, combustion temperature, destruction and capture efficiency, etc. Annual reports shall be sent to the BESD office.


26. This permit replaces construction permits AC 16-127873, AC 16-57752, AC 16-57753 and AC 16-50418.

27. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

28. An application for an operation permit must be submitted to the BESD 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. Rules 17-4.055 and 17-4.220).

Issued this 7th day
of June, 1991

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**


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

the additional premium of March 31, 1981.

§ 2602.4 [Amended]

3. Section 2602.4 is amended by deleting "section 4022(a)" wherever it appears and substituting "sections 4022(a) or 4022A(a)."

4. Section 2602.5 is revised to read as follows:

§ 2602.5 Premium rate.

(a) *Single employer plans.* Plans other than multi-employer plans shall pay the following premiums for basic benefits guaranteed under section 4022(a) of the Act:

(1) For plan years beginning on or after January 1, 1978, two dollars sixty cents for each individual who is a participant in such plan on the last day of the preceding plan year;

(2) For plan years beginning on or after September 2, 1976 and ending on or before December 30, 1976, one dollar for each individual who is a participant in such plan on the last day of the preceding plan year; or

(3) For plan years beginning before September 2, 1976, one dollar for each individual who is a participant in such plan at any time during the plan year.

(b) *Multiemployer plans.*

Multiemployer plans shall pay premiums for basic benefits guaranteed under section 4022(a) or 4022A(a) as follows:

(1) For plan years beginning after September 26, 1980, multiemployer plans shall pay premiums at the rate set forth in the following table for each individual who is a participant in such plan on the last day of the preceding plan year.

	Rate
For plan years beginning:	
After Sept. 26, 1980 and before Sept. 27, 1984	\$1.40
After Sept. 26, 1984 and before Sept. 27, 1986	1.60
After Sept. 26, 1986 and before Sept. 27, 1988	2.20
After Sept. 26, 1988	2.80

(2) For the plan year in which September 26, 1980 falls ("the enactment year"), multiemployer plans shall pay a premium for each individual who is a participant in such plan on the last day of the preceding plan year at the rate set forth in the following table:

	Rate
For plan years beginning in:	
September 1979	\$.50
October 1979	.54
November 1979	.58
December 1979	.62
January 1980	.67
February 1980	.71
March 1980	.75
April 1980	.79
May 1980	.83
June 1980	.88

	Rate
Jun. 1981	.92
Aug. 1981	.96
September 1981 (or, if before Sept. 26)	1.00

The rates in the above table equal (after rounding) the sum of—

(i) Fifty cents multiplied by a fraction, the numerator of which is the number of calendar months in the enactment year ending before September 26, 1980, and the denominator of which is twelve, and

(ii) One dollar, multiplied by a fraction equal to one minus the fraction determined under paragraph (b)(2)(i) of this section.

(3) For plan years before the enactment year, multiemployer plans shall pay premiums as follows:

(i) For plan years beginning on or after September 2, 1976, fifty cents for each individual who is a participant in such plan on the last day of the preceding plan year; or

(ii) For plan years beginning before September 2, 1976, fifty cents for each individual who is a participant in such plan at any time during the plan year.

(c) For plans not previously covered under section 4021 of the Act, the plan shall pay the applicable premium under paragraphs (a) or (b) of this section for each individual who is a participant in such plan on the plan's effective date.

§ 2602.6 [Amended]

5. Section 2602.6 is amended by deleting "(Rev. August 1975)."

6. Section 2602.12 is revised to read as follows:

§ 2602.12 Mailing address.

Plan administrators shall mail the Form PBGC-1 and all payments for premiums, interest and penalties to: Pension Benefit Guaranty Corporation, P.O. Box 2454, Washington, D.C. 20013.

(Secs. 4002(b)(3) and 4006(a), Pub. L. 93-400, 88 Stat. 1004, as amended by Secs. 403(l) and 105 (respectively), Pub. L. 96-384, 94 Stat. 1208 (29 U.S.C. 1302(b)(3) and 1306(a)))

Issued at Washington, D.C. on this 3rd day of December 1980.

Ray Marshall,
Chairman, Board of Directors, Pension Benefit Guaranty Corporation.

Issued on the date set forth above, pursuant to a resolution of the Board of Directors approving this regulation authorizing its Chairman to issue same.
Mitchell Strickler,
Acting Secretary, Pension Benefit Guaranty Corporation.

[17] Doc. 80-37879 Filed 12-5-82 2:45 am;
BILLING CODE 7760-01-M

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 51

[AD-FRL-1694.3; Docket No. A-80-55]

Compliance With VOC Emission Limitations for Can Coating Operations.

AGENCY: Environmental Protection Agency.

ACTION: Notice of policy memorandum.

SUMMARY: Reproduced below is a copy of a memorandum in which the Assistant Administrator for Air, Noise and Radiation describes an acceptable compliance program for can coating operations. This compliance program will allow the use of a daily weighted average in conjunction with a plantwide emission limitation.

FOR FURTHER INFORMATION CONTACT: Leo Stander, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards (MD-15), Research Triangle Park, N.C. 27711, (919/541-5516).

SUPPLEMENTARY INFORMATION: The memorandum reproduced below, which the Assistant Administrator for Air, Noise and Radiation sent to the ten EPA Regional Administrators, describes a program for determining compliance with appropriate emission limitations State Implementation Plans. This memorandum notifies State and local agencies that in EPA's view, in general their regulations may be interpreted as allowing a daily weighted average for approving permits and compliance plans without further regulatory changes or SIP revisions. EPA is encouraging this approach. A suggested format is attached to the memorandum.

David G. Hawkins,
Assistant Administrator for Air, Noise and Radiation.

United States Environmental Protection Agency,

Office of Air, Noise, and Radiation,
Washington, D.C., November 20, 1980.

Subject: Compliance with VOC Emission Limitations for Can Coating Operations

From: David G. Hawkins, Assistant Administrator for Air, Noise, and Radiation (ANR-443).

Memo to: Regional Administrator, Regions I-X.

The Agency has been requested by the Coatings Manufacturers Institute to consider the utilization of the compliance program described below for determining compliance with appropriate emission limitations in State Implementation Plans. The Agency has previously considered such an approach and in a memorandum dated November 21, 1977 from Richard G. Rhoads, Director, Control

DER

NOV 18 1980

BAQM

Development Division to Director, and Hazardous Materials Division. Sections I-X entitled "RACT Options for Can Coating Operations." The Agency stated that the SIP submittal with such provisions would be approvable. This memorandum expands Mr. Rhoads' memorandum to cover options which can be utilized by States in determining compliance with can coating-VOC emission limitations.

Mr. Rhoads' memorandum stated that a State's regulation which provides for a daily weighted average in conjunction with a plantwide emission limitation would be approvable as part of a SIP. This is because of the severe practical problems faced by can manufacturing plants where a number of lines apply as many as 50 different coatings, depending on the end uses of the cans. In this industry, line specific emission limitations may cause can coaters to be in violation when a high solvent coating is applied.

Regulatory language in State Implementation Plans defining the allowable emission limits for can coating operations differs in detail from State to State and among areas in individual States. The Agency believes that for the most part, the States and relevant local agencies may utilize a daily weighted average to determine whether a can manufacturing operation is in compliance

with the State's emission limitations. EPA is issuing this interpretative statement to notify State and local agencies that in EPA's view, in general, their regulations may be interpreted as allowing daily weighted averages for approving permits and compliance plans without further regulatory changes or the need for a SIP revision. EPA encourages such an interpretation.*

Compliance can be determined for any 24-hour period based on total actual emissions calculated from daily units of production records (e.g., number of each type of can, sheet, or end), application rates of each coating (e.g., gallons/units of production), solvent and solids content of each coating, and control efficiency. This would then be compared to the total allowable emissions for that production mix assuming each coating complied with applicable emission limitations. The attached suggested format allows use of a standardized equation to express the weight of VOC per gallon of coatings, less water, in terms of weight of VOC per gallon of solids to determine

* This compliance method may be applicable to multiple situations where the plants are under common ownership or control and are located in the same geographic area. EPA will consider approval of such multiple applications of this method.

compliance. The pounds of solvent per gallon of coating should be based on a certified analysis of the VOC content of each coating given to the user by the supplier. This analysis should be verifiable by laboratory analysis. For purposes of emission limitation compliance, VOC content of coatings is the responsibility of the user. The percent capture and control efficiency must be established by using approved test methods on the worst case solvent or for all cases of use and held constant until such time as a new test is conducted to demonstrate a different efficiency.

It is essential that companies keep detailed records in a format that will allow simple and accurate verification and that the information be available as necessary for compliance certification and possible enforcement action. Further, standard test methods to verify the solvent content of each coating should be in accordance with those prescribed in the State's regulations.

States are urged to utilize enforcement techniques which encourage the development and use of low solvent coatings technology in the can manufacturing industry. In the long run, use of such technology is preferable to incineration from the point of view of reliability and maintenance of controls, as well as for purposes of energy conservation: Attachment.

Suggested Format for Determining Compliance for Can Coating Operations¹

	Pounds VOC per gallon coating less water	Percent solids	Percent solvent	Percent water	Pounds VOC per gallon solids	Application rate (gallon per units produced)	Units produced	Gallon coating applied (l x g)	Gallon solids applied (b x h + 100)	Control ² efficiency	Pounds of VOC (a x l x (1 - d))
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
Actual Emissions											
1 Sheet coating	6.42	26.4	73.6		20.52	22	5	110	29.0	0.81	113.1
2 Sheet coating	1.09	50.0	8.7	41.3	1.29	10	24	240	120.0		153.6
3 Sheet coating	5.06	31.2	68.8		16.23	10	24	240	74.9	.81	231.0
4 Side seam	6.34	13.8	86.1		45.59	1.5	18	27	3.8		173.2
5 Inside spray	3.91	16.0	18.1	65.9	6.33	8	24	192	30.7		256.7
6 End compound	4.20	42.9	67.1		9.60	1.5	74	36	15.4		160.9
Actual total emissions											1,077.5
Allowable Emissions Using Complying Coating³											
1 Sheet coating	2.8				4.52				29.0		131.1
2 Sheet coating	2.8				4.52				120.0		542.4
3 Sheet coating	2.8				4.52				74.9		338.5
4 Side seam	6.5				21.78				3.8		82.7
5 Inside spray	4.2				9.78				30.7		300.2
6 End compound	3.7				7.44				15.4		114.6
Allowable total emissions											1,509.5

¹ Concept based on the following principal for comparing actual and allowable emissions: Pounds VOC emitted = pounds VOC per gallon of solids x gallons of solids applied per unit. (Same units of solids applied for actual and allowable)

² Control efficiency varies with emission devices used. The percent capture and control efficiency must be established by using approved test methods on the worst case solvent or for all cases of use and held constant until such time as a new test is conducted to demonstrate a different efficiency

³ Complies with State VOC emission limitations.

NOTE.—Data in columns a, b, c, d, f, g, and j (under actual emissions) obtained from plant records including thinning solvent

D = Density of solvent for complying coating (average density is 7.36 lb/gallon)

$$e = \frac{(a) \times C}{(b)} \quad C = 100 \text{ pct or } e = \frac{D \times (a)}{(D - (a))}$$



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: Steve Smallwood

FROM: Clair Fancy *CF*

DATE: May 31, 1991

SUBJ: Approval of Construction Permit AC 16-187863
Anheuser-Busch Companies, Inc.

*OK / Thank you
6-7-91*

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct/modify can coating lines Nos. 1, 2, 3, and 4.

Comments were submitted by Mr. Dean E. Pusch, Senior Environmental Scientist with Anheuser-Busch Companies, Inc. and Mr. Ron Roberson, Associate Engineer with BESD. Their comments are addressed in the Final Determination.

I recommend your approval and signature.

CF/TH/plm

Attachments

6/5
Steve -
changed as
requested.
Clair

OKF
Redo as indicated, return ASRP.

① Let's discuss the phase #11 not limited to "make the apparatus measuring less condition in other places the wording is too imprecise."

He
6-3-91



ANHEUSER-BUSCH COMPANIES

May 20, 1991

RECEIVED

MAY 24 1991

Division of Air
Resources Management

Mr. Barry Andrews, P.E.
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
Jacksonville Can Plant
Draft Final Determination**

Marlene Accardo of MCC and I have reviewed the draft of the final determination and offer the following comments:

New Specific Condition No. 18

This condition requires that BESD be notified prior to "use of a different coating (not including in the application)..." Since different coatings are used quite often, MCC requests that notification be required only in the event that the VOC content of a coating increases above that of the previous coating.

Compliance Determination

MCC concurs with Mr. Robertson's recommendation of destruction efficiency testing on the thermal oxidizers in combination with tracking of coating usage. This method of compliance determination is required by the South Coast Air Quality Management District for MCC's Carson, California can plant. Thermal oxidizer inlet and outlet are measured and coating usage tracked.

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

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.

D. E. Pusch
Environmental Engineering
& Site Services Department

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Air Resources Division

RECEIVED

APR 11 1991

DER - BAQM



April 8, 1991

Mr. Barry Andrews
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Anheuser - Busch Companies, Inc. - Metal Container
Corporation Permit AC16-187863
Can Coating Lines Nos. 1, 2, 3, and 4

Dear Mr. Andrews:

The Air Resources Division (ARD) provides the following comments for the proposed modification of Metal Contain Corporation (MCC) four (4) can coating lines.

1. Emission Limits - ARD requests that the specific conditions referencing allowable emissions specify whether the allowable emissions are stack emissions only or total emission generated by each coating line.

Determining compliance for stack emissions only would require testing of the stack exit.

Determining compliance for total emissions would require capture and destruction efficiency testing. If this is required, ARD recommends that the permit also provide applicable limitations for minimum capture and destruction efficiencies.

ARD recommends that the procedure listed in Specific Condition 14. (45 FR 80824) be attached to the permit for ready reference.

2. Compliance Determination - MCC operates four (4) coating lines utilizing two (2) thermal oxidizers as emission control devices. To determine compliance, will each coating line be required to demonstrate individually that the allowable emissions rates are achieved or will collective emissions testing results be acceptable as demonstration of compliance?

ARD recommends destruction efficiency testing on each thermal oxidizer in combination with a mathematical determination of the capture efficiency by recordkeeping of coatings applied during the testing period. ARD finds collective testing acceptable if all four (4) units are operating at 90 - 100% as described by the permit and permit application.



Mr. Barry Andrews
Anheuser - Busch Co. - Metal Container

Page 2

April 8, 1991

Please address any comments or questions to the undersigned at (904) 630-3666.

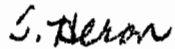
Very truly yours,



Ronald L. Roberson
Associate Engineer

RLR/nic

cc: Andy Kutyna, P.E., DER
Wayne Tutt, ARD
Air Permitting File
ARD File 1860-A



File Copy



ANHEUSER-BUSCH COMPANIES

March 20, 1991

RECEIVED

MAR 25 1991

DER-BAQM

Mr. Barry Andrews, P.E. - Administrator
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 -
Jacksonville Can Plant
Permit AC 16-187863**

Dear Mr. Andrews:

This letter contains Metal Container Corporation's (MCC) comments on the Technical Evaluation and Preliminary Determination and proposed permit to modify the referenced facility.

Specific Condition 11. - Permitted Parameters

Line No. 1 production should read "10% of 16 oz. cans sizecoated."

Specific Condition 12. - Compliance Determination

Testing has been performed on the existing VOC control system at the plant. Thus, MCC requests that the permit condition be modified to require capture efficiency determination on the equipment/control system that is being modified, since data is currently available for those portions of the facility that won't be changed.

Specific Condition 18. - Use of Different Coating

The condition, as written, requires Method 24 test results on the VOC content of any change in coatings/solvents. MCC proposes that the use of supplier certified analysis of VOC content be added to the condition as an alternative means of determining VOC content of any new coatings/solvents. This approach is consistent with the methodology required by the Department as the means to determine RACT compliance in Specific Condition 14.

Specific Condition 20. - Spills, Leaks, Etc.

Releases at the facility are required to be reported under other regulations, e.g., CERCLA/SARA. Copies of any reports required by these regulations will be submitted to the BESD.

Specific Condition 26. - Annual Reports

This condition, as written, requires reporting of VOC emissions in tons/year, pounds/day, and pounds/hour. These units are inconsistent with the units of the permit limits set out in Specific Conditions 1, 3, 4, and 5, which are tons/year, tons/month, and tons/day. MCC requests Condition 26 be changed so that the recordkeeping units are consistent with the emission limit units in Condition 1, 3, 4 and 5.

Specific Condition 27. - Permits Replaced

File records show that the proposed permit would replace operating permits AO-16-164835, AO-16-134410, AO-16-141580 and AO-16-141581.

The following comments address changes in information presented in the Technical Evaluation and Preliminary Determination:

Section II.2 - Standard Industrial Classification Code

The appropriate SIC code for the facility is 3411 - Metal Cans.

Section V.1 - Emission Limitations

The second paragraph should read, "The largest portion of the VOC emissions will result from butyl cellosolve and n-butyl alcohol, which are components of the coatings."

If you need further clarification regarding these comments, please call me at (314) 577-4162.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Dean E. Pusch
Sr. Environmental Scientist
DEP:cd

BA/CHF

Teresa Heron
Andy Kutyna, NE Dist.
Ron Robertson, BESD

} 3-28-91 RAC



**Metal Container
Corporation**

ONE OF THE ANHEUSER-BUSCH COMPANIES

March 15, 1991

RECEIVED

MAR 18 1991

DER-BAQM

C. H. Fancy
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Sir:

Please find certification of publication for intent to issue for Metal Container Corporation, Jacksonville, Florida. REF DER FILE NO. AC 16-187863. If I can be of any assistance or you need any additional information, please contact me at 904-695-7660.

Thank you.

METAL CONTAINER CORPORATION



James A. Reed
Engineering Manager

JAR302.91/jb

cc: R. Lanham
C. Kenfield
File

J. Keon
A. Kutyna, NE Dist
R. Robinson, BESD

FLORIDA PUBLISHING COMPANY
Publisher
 JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
 COUNTY OF DUVAL }

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 Anheuser-Busch Companies, Inc., Metal Container Corporation, 1100 North Ellis Road, Jacksonville, Florida 32206-6257, to modify can coating lines numbers 1, 2, 3 and 4. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical 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

Duval County Dept. of Health, Welfare
 & Bio-Environmental Services
 421 West Church Street, Suite 412
 Jacksonville, Florida 32202-4111

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Before the undersigned authority personally appeared _____

Donna Sapp

who on oath says that he is

a classified advertising rep

of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the

attached copy of advertisement, being a legal notice

in the matter of state of florida

in the _____ Court,

was published in THE FLORIDA TIMES-UNION in the issues of _____

March 6th, 1991

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceeding 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, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me this 11th day of

March A.D. 19 91

Molly Strain

Notary Public,
 State of Florida at Large.

Donna Sapp

My Commission Expires _____

Notary Public, State of Florida

DA 444 My Commission Expires Dec. 2, 1994

Bonded Thru Troy Fain - Insurance Inc.

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. Robert M. Lanham
 Anheuser-Busch Companies,, Inc.
 Executive Office
 One Busch Place (202-4)
 St. Louis, Missouri 63118

4. Article Number
 P 407 853 163

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 *Scott Lodak*

7. Date of Delivery
 2-25-91

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 407 853 163

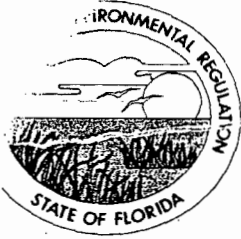
RECEIPT FOR CERTIFIED MAIL

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	
Street and No. One Busch Place (202-4)	
P.O., State and ZIP Code St. Louis, Missouri 63118	
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: 2-22-91 Permit: AC 16-187863	

BEST AVAILABLE COPY



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 21, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED


Mr. Robert M. Lanham, Environmental Engineer
Anheuser-Busch Companies, Inc.
Executive Office
One Busch Place (202-4)
St. Louis, Missouri 63118

Dear Mr. Lanham:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to modify can coating lines numbers 1, 2, 3 and 4.

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,


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

CHF/TH/plm

Attachments

c: Andrew G. Kutyna, DER
John H. Schamburg, P.E.
Darrel J. Hall, BESD

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Anheuser-Busch Companies, Inc.
Metal Container Corporation
1100 North Ellis Road
Jacksonville, Florida 32206-6257

DER File No. AC 16-187863

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, Anheuser-Busch Companies, Inc., applied on October 11, 1990, to the Department of Environmental Regulation for a permit to modify can coating lines numbers 1, 2, 3 and 4.

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:

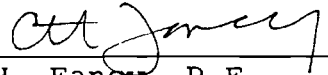
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c)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



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

Copies furnished to:

c: Andrew G. Kutyna, DER
John H. Schamburg, P.E.
Darrel J. Hall, BESD

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 2-22-91.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kyri Jaber
Clerk

2-22-91
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 Anheuser-Busch Companies, Inc., Metal Container Corporation, 1100 North Ellis Road, Jacksonville, Florida 32206-6257, to modify can coating lines numbers 1, 2, 3 and 4. A determination of Best Available Control Technology (BACT) was not 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

Duval County Dept. of Health, Welfare
& Bio-Environmental Services
421 West Church Street, Suite 412
Jacksonville, Florida 32202-4111

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Anheuser-Busch Companies, Inc.
Metal Container Corporation
Duval County
Jacksonville, Florida

Can Coating Lines Nos. 1, 2, 3 and 4

Permit Number: AC 16-187863

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

February 21, 1991

I. SYNOPSIS OF APPLICATION

I.1 Applicant Name and Address

Anheuser-Busch Companies, Inc.
Metal Container Corporation
1100 North Ellis Road
Jacksonville, Florida 32206-6257

I.2 Reviewing and Process Schedule

Date of Receipt of Application: October 11, 1990.

30 Days Completeness Review: November 10, 1990.

Additional Information Received: November 29, 1990.

Application Completeness Day: November 29, 1990.

II. FACILITY INFORMATION

II.1 Facility Location

Metal Container Corporation is located at 1100 North Ellis Road in Jacksonville, Duval County, Florida. The UTM coordinates are zone 17, 428.440 km East and 3356.377 km North.

II.2 Standard Industrial Classification Code

This facility is classified as follows:

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

Group No. - 347 Coating, Engraving, and Allied Services.

Industry No. - 3479 Coating, Engraving, and Allied Services, Not Elsewhere Classified.

II.3 Facility Category

Metal Container Corporation (MCC) is classified as a major emitting facility for volatile organic compounds (VOC). The total VOC permitted emissions for this facility was 403.5 tons per year. The proposed project will reduce plant-wide emissions by 27.50 tons per year. The total permitted emissions for this facility shall not exceed 376 tons per year.

III. PROJECT DESCRIPTION

As a result of the numerous changes that have occurred at this facility since 1981, a new construction permit (covering all

lines) will be issued. This permit will indicate all the modifications that have taken place at this facility during the time period comprising the years 1981-1991. Total plant-wide emissions will be reduced by 27.50 tons per year. The latest modification (year 1990) will include internal changes to line No. 1 and line No. 2. These proposed changes include the following:

Line No. 1

1. Dismantle and remove the existing basecoater and basecoater pin oven.
2. Relocate the inside spray machines and respray machine to the second floor near the inside bake oven. This will reduce the distance the can travels from the sprayer to the oven and thereby reduce fugitive emissions.
3. Can bodies will be routed to the current Line 2 basecoater and basecoater pin oven. This will become the line 1 basecoater and basecoater pin oven. However, this equipment will not be moved from its present location.
4. The existing printer will be able to produce 16 oz cans at 1000 CPM and 12 oz cans at 1050 CPM.

Line No. 2

1. The basecoater and basecoater pin oven will be connected to Line No. 1 (i.e., Line 2 will no longer have the capability to produce basecoated cans).

Additionally, the basecoaters and basecoater pin oven exhausts on Line Nos. 3 and 4 will be ducted into thermal oxidizer #2 to further reduce emissions.

Present Plant Layout

Attachment A is a diagram showing the plant configuration and the ducting to the thermal oxidizers when the permits to operate were issued (1988).

Attachment B is a diagram showing the plant configuration and ducting to the thermal oxidizers after these proposed changes are completed. This diagram also includes all modifications accomplished at the facility (1981-1991).

III.1 Background Information

The following is a list of the chronological activities that have occurred at the plant since 1981.

o 1981 - The plant switched to water based coating technology. The Department determined this year to be the

baseline date for contemporaneous increases or decreases. Actual emissions of 315.5 TPY plus RACT credit of 48.0 TPY formed the baseline of 363.5 TPY. Previously, the plant used solvent-based coatings and controlled VOC by thermal oxidation. Application renewals for operating permit were submitted and permits to operate were issued on October 29, 1981 (AO 16-44656, 57, 58 and 59). Applications to construct overvarnish units on Can Coating Lines 1 and 2 were submitted on November 18, 1981.

- o 1982 - Permits to construct (overvarnish) on Can Coating Lines 1 and 2 were issued (AC 16-50417, 18). These permits allowed Can Coating Lines 1 and 2 the use of overvarnish on the outside surface of white basecoating cans in order to increase the can thickness to alleviate abrasions problems encountered during shipping of the product. Emissions level increase of 45.1 tons per year VOC was subject to limited new source review requirements contained in F.A.C. Rule 17-2.510(3)(a)1.a.(ii).

Certificates of Completion of Construction were submitted on April 23, 1982, for AC 16-50417, 18. Permit to operate the overvarnish unit on Lines 1 and 2 were issued (AO 16-55208, 10). They expired on May 31, 1987.

Applications to construct overvarnish units on Can Coating Lines 3 and 4 were submitted on July 1, 1982. These lines were permitted for the addition of a roll coating unit to the existing dry offset lithography unit. Permits to construct (overvarnish) on Can Coating Lines 3 and 4 were issued (AC 16-57752, 53). Total plant emissions were limited to 403.5 tons of VOC per year to avoid a significant net emissions increase. Certificates of Completion of Construction were submitted for AC 16-57752 and -57753 on October 21, 1982. Permits to operate Can Coating Lines 1, 2, 3, and 4 (AO 16-55208, -62285, and -62287), including overvarnish units on all lines, were issued on December 1, 1982, and expired on May 31, 1987.

- o 1984 - Necker/Flanger Lube Reduction.

- o 1985 - Request to modernize line speeds from 950 to 1,400 can per minute for Can Coating Lines 2, 3, and 4. Can Coating line No. 1 was to remain as a back-up line. Actual emissions were projected at less than 403.5 tons VOC per year, so no significant emission increase occurred.

- o 1986 - Specific Conditions 2 and 4 of Construction Permit Nos. AC 16-57752 and -57753 were modified to reflect modernized lines. On August 18, 1986, MCC requested to reinstate Line No. 1 from a standby to a full-time basis and to increase the speed of the line to 1,000 cans per minute. The overvarnish and bottom varnish operations from the three modernized lines were ducted to the line thermal oxidizer No. 2 in order to

provide an offset of 45.7 tons per year. The application was submitted on November 26, 1986. On September 30, 1986, MCC requested approval of a schedule for start-up and emissions testing of thermal oxidizer Nos. 1 and 2. This request was approved on October 6, 1986.

o 1987 - Additional information received on January 21, 1987, for the modification of Can Coating Line No. 1. On January 22, 1987, the schedule for start-up and emission testing program was extended from February to April 1987. On February 6, 1987, MCC requested approval to begin installation of the necessary duct work to vent the three basecoater oven exhausts to the existing thermal oxidizer. This request was approved on March 4, 1987. On March 30, 1987, the schedule for start-up and emission testing program was extended from April 1, 1987, to October 1, 1987. On July 21, 1987, a permit was issued for Can Coating Line No. 1. On October 22, 1987, a request to extend the expiration date to July, 1988 of permit AC 16-127873 was approved.

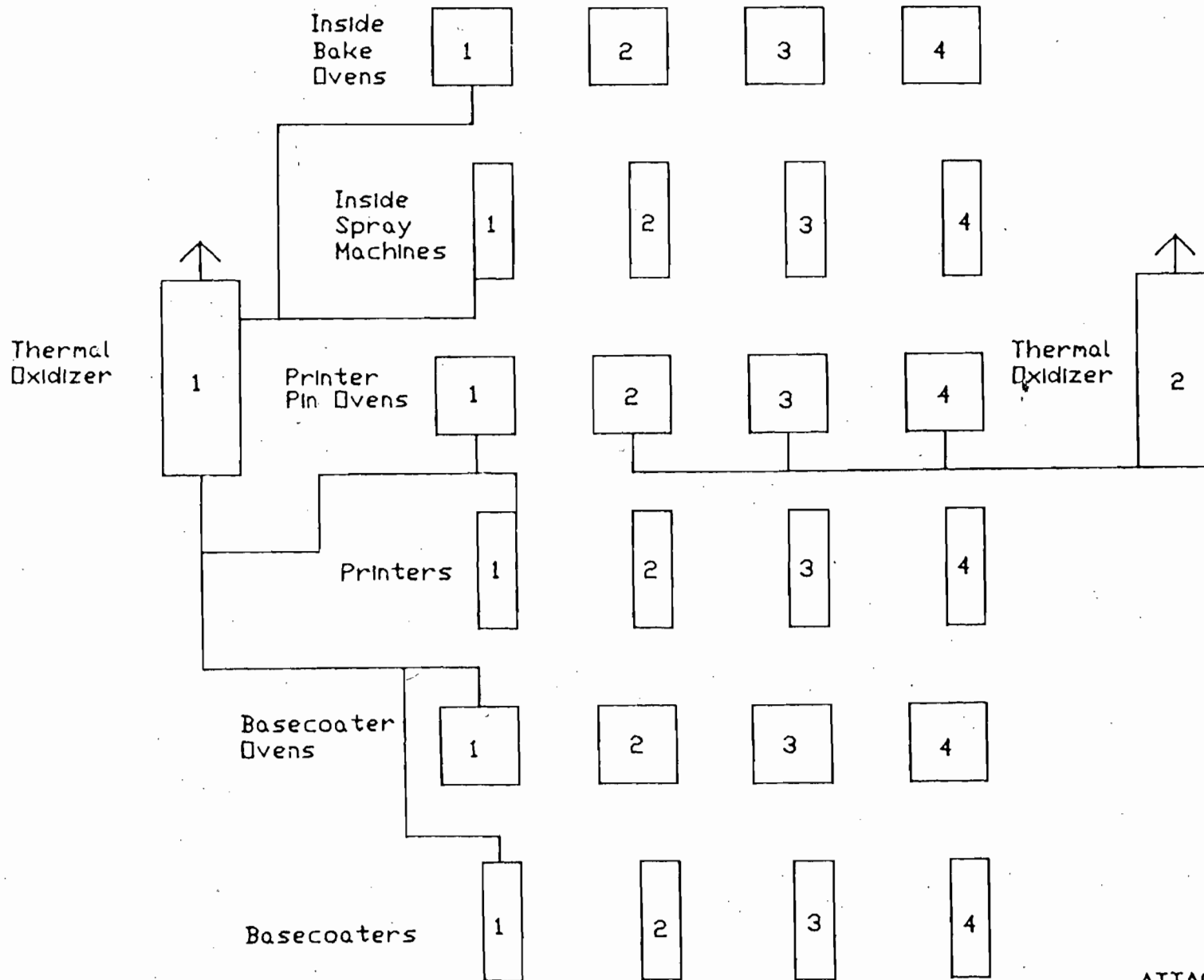
o 1988 - On March 8, 1988, a request to include the respray machine and to increase the maximum daily emissions for Can Coating No. 1 to 0.19 tons was approved. On April 8, 1988 a request to extend the expiration of permit No. AC 16-127873 to October 1, 1988, was approved. The company was finalizing connection of the duct work from the inside respray machine into T.O. No. 1, and the stack test was pending. On October 5, 1988, a request to extend the expiration date of permit AC 16-127873 was approved in order for the company to complete engineering modifications to improve capture efficiency and the required source test.

o 1989 - On April 20, 1989, a letter was received explaining the company's effort to improve capture and destruction efficiencies. On June 20, 1990, a letter was received from the BESO, which included Anheuser-Busch's letters of May 4, 1990, and September 22, 1989. The Company's letter dated May 4, 1990, was to request permit AC 16-127873 be modified to reflect some internal changes proposed. The Company's letter dated September 22, 1989 was to request amendment of operating permits AO 16-164835, 16-134410, 16-141581 and 16-141580.

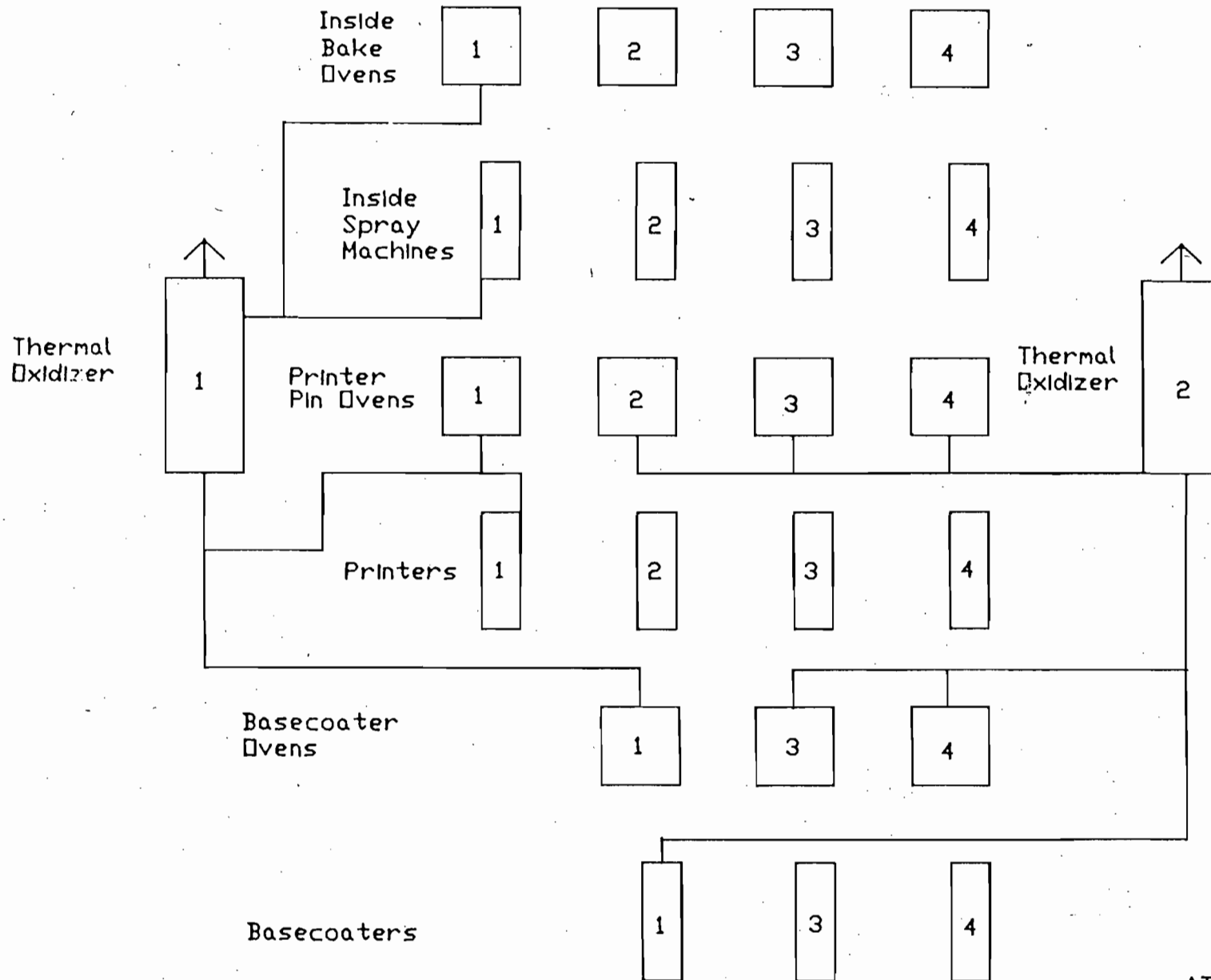
o 1990 - On July 24, 1990, the BAR responded to Anheuser-Busch requesting the Company to submit a complete application for permit to construct Can Coating Lines No. 1, 2, 3, and 4. On October 11, 1990, the Company submitted an application requesting internal changes to Lines No. 1 and 2, including the facility's modifications.

o 1991 - Permit No. AC 16-187863 (current proposal). This permit will incorporate all modifications performed at the facility for the last ten years.

METAL CONTAINER CORPORATION JACKSONVILLE, FLORIDA



METAL CONTAINER CORPORATION JACKSONVILLE, FLORIDA



A summary of the annual VOC emissions is shown below:

<u>Year</u>	<u>Allowable VOC Emissions (TPY)</u>
1980	366.3
1981	315.5
1982	363.5
	403.5
1983-86	403.5
1987-90	400.3
1991	376.0

IV. 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 is located in an area (Duval County) currently designated nonattainment for volatile organic compounds (VOC).

In 1987 a modification to Can Coating Line No. 1 was reviewed under F.A.C. Rule 17-2.510, New Source Review (NSR) for nonattainment areas. F.A.C. Rule 17-2.510 did not require the full nonattainment new source review since an overall net reduction of emissions (45.7 TPY) from the facility was expected. However, federal rules (netting individual units in a nonattainment area) required the application of LAER. Therefore, it was determined that the application of thermal oxidizers to control emissions from Can Coating Lines No. 1 (thermal oxidizer No. 1) 2, 3, and 4 (thermal oxidizer No. 2) in conjunction with low solvent technology was LAER. This LAER determination assured compliance with both state (F.A.C. Rule 17-2.510) and federal rules (40 CFR 51, Vol. No. 233, Emissions Trading Policy Statement).

Metal Container Corporation proposed the use of waterborne coatings and incineration of the VOC emitted from the three ovens as LAER determination for this facility. A detailed description of the LAER determination done in 1987 is attached.

The modification of Can Coating Line No. 1 increased emissions by 42.5 tons of VOC per year. The overall project, reinstating Can Coating Line No. 1 from stand-by to a full time basis and ducting the overvarnish and bottom varnish operations from the three modernized lines to thermal oxidizer No. 2, provided a contemporaneous emissions decrease of 45.7 tons of VOC per year. A net emissions decrease of 3.2 tons of VOC per year occurred at this facility in 1987.

Presently, this facility is being reviewed in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment

requirements. A net emission decrease of 27.50 tons per year is expected as a result of this project. Permitted emissions for this facility shall not exceed 376 tons per year.

This facility shall comply with F.A.C Rule 17-2.650(1)(f)(1), Reasonably Available Control Technology (RACT) for Can Coating Operations; F.A.C Rule 17-2.620, General Pollutant Emission Limiting Standards; F.A.C. Rule 17-2.640, Lowest Achievable Emission Rate (LAER); New Source Performance Standard for Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW, and F.A.C Rule 17-2.700, Emission Test Procedures.

V. SOURCE IMPACT ANALYSIS

V.1 Emission Limitations

The operation of the can coating facility will produce emissions of volatile organic compounds to the atmosphere.

The largest portion of the VOC emissions will result from methyl ethyl ketone, methyl chloroform and butyl cellosolve used as solvents.

The following summary shows the permitted emissions for this facility. These permitted emissions are in compliance with all applicable requirements of F.A.C. Rule 17-2 and New Source Performance Standards for Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW.

Emissions Summary
Volatile Organic Compounds
Allowable Emissions

The permitted emissions for the whole plant are 1.1 tons of VOC per day, 31.2 tons of VOC per month, and 376 tons of VOC per year.

Maximum permitted emissions for Can Coating Line No. 1 shall not exceed:

White Basecoat	1.77 lbs VOC/gal - H ₂ O
Bottom Varnish	1.92 lbs VOC/gal - H ₂ O
Over Varnish	2.29 lbs VOC/gal - H ₂ O
Inside Spray	3.62 lbs VOC/gal - H ₂ O

The RACT regulations for this can coating facility (Can Coating Lines Nos. 2, 3, 4) are as follows:

- A) 2.8 pounds per gallon of coating (0.34 kilograms per liter), excluding water, delivered to the coating applicator of;

- (a) Sheet basecoat (exterior and interior) and overvarnish, or
 - (b) Two-piece can exterior (basecoat and overvarnish) operation.
- B) 4.2 pounds per gallon of coating (0.50 kilograms per liter), excluding water delivered to the coating applicator from two- and three-piece can interior body spray and two-piece can exterior end (spray or roll coat) operations.

Compliance for each coating line shall be determined as follows:

For any 24-hour period, the total actual VOC emissions shall be calculated from daily units of production records (e.g., number of each type of can, sheet, etc.), application rates of each coating (e.g., gallons/units of production), solvent and solids content of each coating, and control efficiency. This would then be compared to the total allowable emissions for that production mix to verify each coating complied with applicable RACT emission limitations.

On an annual basis, compliance with the VOC emission rate from thermal oxidizers Nos. 1 and 2 shall be determined by EPA Reference Methods 25 or 25A, or any other method approved by the Department. Can Coating Line No. 1 shall comply with the attached Lowest Achievable Emission Rate (LAER) determination. Reporting and recordkeeping requirements shall be as described in 40 CFR 60.495, NSPS for Beverage Can Surface Coating Industry, Subpart WW.

V.2 Air Quality Analysis

From a technical review of the application, the Department has determined that the modification and operation of these sources will not have an adverse/significant impact on Florida's ambient air quality standards.

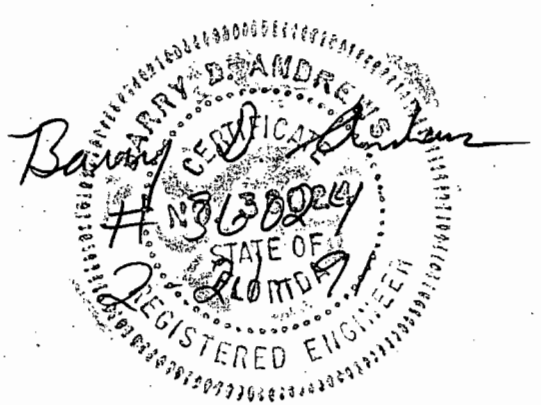
V.3 Air Toxics Information

Currently, the Department is developing acceptable ambient concentrations for toxic substances. Specifically, sources classified as Category A (carcinogens and highly toxic) and Category B (moderately toxic substances).

In the event toxic emission limits are set during the term of this permit or any subsequent permit which are different than the permitted emissions, the Department may seek modification pursuant to F.A.C. Rule 17-4.08.

VI. CONCLUSION

Based on the information provided by Anheuser-Busch Companies, Inc., the Department has reasonable assurance that the proposed construction/modification of Can Coating Lines Nos. 1, 2, 3 and 4, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.



Lowest Achievable Emission Rate (LAER) Determination
Metal Container Corporation
Duval County

The applicant has submitted a request to reinstate can line No. 1 from a standby to a full-time basis, with the line speed being increased to 1,000 cans per minute. The can line, which will apply the coatings to beer and soft drink cans, is scheduled to operate continuously 8,760 hours per year.

The Metal Container Corporation is located in Duval County, which is currently designated nonattainment for the pollutant ozone, Rule 17-2.410(1), FAC. The proposed reinstatement of can line No. 1 will result in an increase of 42.5 tons of volatile organic compounds (VOCs) per year. VOCs are considered to be precursors to ozone, thus the modification of can line No. 1 is subject to a LAER determination as set forth in Rule 17-2.510, FAC, New Source Review (NSR) for nonattainment areas. In accordance with the provisions of the NSR rule for nonattainment areas, the overvarnish and bottom varnish operations from three existing lines will be ducted to thermal oxidizers to provide an offset of 45.7 tons of VOCs per year.

Date of Receipt of LAER Application:

January 21, 1987

Review Group Members

This determination was based upon comments received from the Stationary Source Control Section.

LAER Determination by DER:

Pollutant	Emission Limit
Ozone (VOC)	Emissions limited by using a combination of low solvent water-borne coatings* and catalytic oxidation of emitted VOC vapors.

*VOC content of solvents shall be limited to the following:

White Basecoat	-	1.77 lbs VOC/gal - H ₂ O
Bottom Varnish	-	1.92 lbs VOC/gal - H ₂ O
Over Varnish	-	2.29 lbs VOC/gal - H ₂ O
Inside Spray	-	3.62 lbs VOC/gal - H ₂ O

LAER Determination Rationale:

The procedure for determining LAER is set forth in Rule 17-2.640, FAC. In accordance with this procedure, the determination of LAER shall not allow the modified source to emit any affected pollutant in excess of the amount allowable under any applicable Environmental Protection Agency Standard of Performance for New Stationary Sources (NSPS) promulgated pursuant to 40 CFR Part 60.

The coating of beverage cans is regulated under Subpart WW of NSPS. In accordance with this regulation, VOC emissions are limited to 0.29 kilogram per liter of coating solids for exterior base coating operations, 0.46 kilogram per liter of coating solids for overvarnish coating operations, and 0.89 kilogram per liter of coating solids for inside spray coating operations. The applicant has indicated that the VOC emissions for the exterior base coating, overvarnish coating, and the inside spray coating operations are 0.28, 0.40, and 0.88 kilograms per liter of coating solids, respectively. These emission rates are less than the specified NSPS limitations and are thereby consistent with the LAER determination guidelines.

In addition to ensuring compliance with applicable NSPS, the Department, when preparing a LAER determination, shall give consideration to and make a determination that reflects: 1) information published by the USEPA including the BACT/LAER Clearinghouse, 2) the most stringent emission limitation which is contained in the implementation plan of any state, 3) the most stringent emission limitation which is achieved in practice, and 4) all scientific engineering, technical material, or other relevant information available to the Department.

The latest (May 1986) BACT/LAER Clearinghouse summary lists data for four facilities with can coating operations. Of the facilities listed, two of the listings had LAER determinations in which LAER was determined to be a 95% efficient thermal incinerator. One of these two facilities consisted of a 1,000 cans per minute line which is identical in throughput to the line proposed for this facility in Jacksonville. The LAER determination for the 1,000 cans per minute line listed in the BACT/LAER Clearinghouse had listed the VOC emissions as being 26.0 tons per year. The estimated emissions of the Jacksonville facility with the proposed LAER are 41.8 tons of VOCs per year, which would suggest that LAER is not being applied when compared to the facility with lower emission rate.

It is important to note, however, that the emission rate from the facility in Jacksonville has included the emissions for clean-up solvents, and the line will be coating 16 ounce cans instead of the smaller 12 ounce cans coated at the other facility. When these differences are taken into account, the LAER proposed for the Jacksonville facility is consistent with the LAER determinations for facilities permitted prior to this time.

The literature research indicates that the use of low solvent coatings in conjunction with thermal incineration of the VOC emissions represents LAER. The Department thereby agrees that the VOC emission limiting strategies for the No. 1 can coating line, as proposed by the applicant, is LAER.

Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

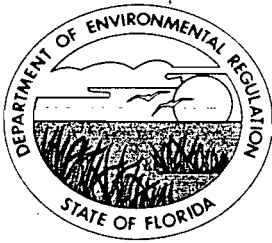
C. H. Fancy
C. H. Fancy, P.E., Deputy Chief, BAQM

Date: July 20, 1987

Approved by:

Dale Twachtmann
Dale Twachtmann, Secretary

Date: 7/22/87



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

PERMITTEE:

Anheuser-Busch Companies, Inc.
Metal Container Corporation
1100 North Ellis Road
Jacksonville, FL 32206-6257

Permit Number: AC 16-187863

Expiration Date: November 30, 1991

County: Duval

Latitude/Longitude: 30°20'15"N

81°40'42"W

Project: Can Coating Lines Nos.
1, 2, 3 and 4

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 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 drawings, 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 Can Coating Lines Nos. 1, 2, 3 and 4 to be located at Jacksonville, Duval County, Florida.

The source shall be constructed 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. DER Form 17-2.202(1) Application to Construct Air Pollution Sources, received on October 11, 1990.
2. Additional Information received on November 29, 1990.

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863 Expiration Date: November 30, 1991

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: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863
Expiration Date: November 30, 1991

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: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863. Expiration Date: November 30, 1991

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. 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

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863 Expiration Date: November 30, 1991

GENERAL CONDITIONS:

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.

14. 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. Maximum VOC emissions for Can Coating Line No. 1 shall not exceed 0.10 tons/day, 3.0 tons/month and 34.5 tons/year.

2. Can Coating Line No. 1 shall not discharge or cause the discharge of VOC that exceeds the following volume-weighted calendar-month average emissions:

- 0.28 Kilogram of VOC per liter of coating solids from each two piece can exterior basecoating operation, except clear basecoat.
- 0.40 Kilogram of VOC per liter of coating solids from each two-piece can clear basecoatings operation and from each overvarnish coating operation.
- 0.88 Kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operations.

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863 Expiration Date: November 30, 1991

SPECIFIC CONDITIONS:

3. Maximum VOC emissions for Can Coating Line No. 2 shall not exceed 0.30 tons/day, 9 tons/month and 109.9 tons/year.

4. Maximum VOC emissions for Can Coating Line No. 3 shall not exceed 0.32 tons/day, 9.6 tons/month and 115.7 tons/year.

5. Maximum VOC emissions for Can Coating Line No. 4 shall not exceed 0.32 tons/day, 9.6 tons/month and 115.7 tons/year.

6. The VOC emissions from the following sources (Lines Nos. 2, 3 and 4) shall not exceed the following RACT standards:

A) 2.8 pounds per gallon of coating (0.34 kilograms per liter), excluding water, delivered to the coating applicator of;

(a) Sheet basecoat (exterior and interior) and overvarnish, or

(b) Two-piece can exterior (basecoat and overvarnish) operation.

B) 4.2 pounds per gallon of coating (0.50 kilograms per liter), excluding water delivered to the coating applicator from two- and three-piece can interior body spray and two-piece can exterior end (spray or roll coat) operations.

7. Total volatile organic compounds (VOC) and organic solvents emissions for the entire facility shall not exceed 1.1 tons/day, 31.20 tons/month and 376 tons/year.

8. Unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant (as listed in the MSDS submitted with the application) shall not exceed the concentration calculated by the following formula:

$$AAC = \frac{(OEL)}{\text{safety factor}}$$

where,

AAC = acceptable ambient concentration

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863 Expiration Date: November 30, 1991

SPECIFIC CONDITIONS:

Safety Factor = 50 for category B substances (8 hrs/day)
100 for category A substances (8 hrs/day)
210 for category B substances (24 hrs/day)
420 for category A substances (24 hrs/day)

OEL = Occupational exposure level such as ACGIH, OSHA, and NIOSH published standards for toxic materials.

9. Visible emissions from this facility shall not exceed 20% opacity.

Operating Rates

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

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

Line No. 1 production: 1050 cans per minute
90% of 16 oz cans basecoated
10% of 10 oz cans sizecoated
50% of 12 oz cans basecoated

Line No. 2 production: 1400 cans per minute
All 12 oz cans
No basecoated cans

Line No. 3 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

Line No. 4 production: 1400 cans per minute
All 12 oz cans
75% of cans basecoated

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

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863
Expiration Date: November 30, 1991

SPECIFIC CONDITIONS:

Compliance Determination

12. Compliance with the VOC standards 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 or the BESD 45 days in advance of the Method and/or protocol selected.

13. Compliance for Can Coating Line No. 1 shall be demonstrated in accordance with Subpart WW - Standards of Performance for the Beverage Can Surface Coating Industry - CFR 60.493. Performance test and Compliance Provisions and CFR 60.496 Test methods and Procedures. Reporting and recordkeeping requirements shall be as described in CFR 60.495.

14. Compliance with RACT regulations for Can Coating Lines Nos. 2, 3 and 4 shall be determined by the procedures described in 45 FR 80824: For any 24-hour period, compliance shall be based on total actual emissions calculated from daily units of production records (number of each type of can, sheet, etc.), application rates of each coating (gallons/units of production), and solvents and solids content of each coating. This will then be compared to the total allowable emissions for that production mix to verify each coating line complied with applicable emission limitations. The pounds of solvent per gallon of coating shall be based on a certified analysis of the VOC content of each coating given to the user by the supplier. This analysis must be verifiable by laboratory analyses.

15. Compliance with the V.E. standards for this facility shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources, as described in 40 CFR 60, Appendix A (July 1989). This V.E. test shall be performed during the VOC emission testing. The duration of the V.E. shall be at least 60 minutes.

16. The minimum requirements for stack sampling facilities, source sampling and reporting shall be in accordance with Rule 17-2.700, F.A.C. and 40 CFR, Appendix A (July 1989). Test results

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863 Expiration Date: November 30, 1991

SPECIFIC CONDITIONS:

will be the average of 3 valid runs. This facility shall be operating between 90% and 100% of permitted capacity during the tests. The permittee shall notify the Duval County Bio-Environmental Services Division (BESD) office in writing at least 15 days in advance of the compliance test. Compliance test results shall be submitted to the BESD office no later than 45 days from the date of testing.

17. Compliance with the acceptable ambient concentrations (AAC) shall be demonstrated based on calculations certified by a professional engineer registered in Florida using actual operating conditions. Determination of the ambient concentration for organic compounds shall be determined by Department approval dispersion modeling. AAC calculations shall be made available upon request.

18. At the request of the BESD or the Department, the permittee shall conduct an EPA Method No. 24 analyses on any coating solvent or waste solvent specified. The use of a different coating requires prior written notification. Notification shall be provided to the BESD and shall include EPA Method 24 test results on the VOC content of the proposed coating and solvent.

19. When the Department or the BESD, after investigation, has good reason (such as complaints, increased visible emissions, etc.), to believe that any applicable emission standard contained in F.A.C. Chapter 17-2, 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 air pollutant emissions from the source and to provide a report on the results of said tests to the Department.

20. If any spills, leaks, excess emissions, etc., occur at this facility, the BESD office shall be notified no later than the next normal business day.

Rule Requirements

21. This facility shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapters 17-2 and 17-4, Florida Administrative Code.

22. 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)).

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863
Expiration Date: November 30, 1991

SPECIFIC CONDITIONS:

23. 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 emissions control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

- maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;
- prevent excessive air turbulence across exposed VOCs;
- 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, valve lines, etc., shall be properly maintained; and,
- all VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

24. This facility is subject to applicable provisions of VOC-RACT Rule 17-2.650(1)(f)1-Can Coating Requirements, 40 CFR 60, Subpart WW-NSPS for Beverage Can Surface Coating Industry, F.A.C. Rule 17-2.510-New Source Review Requirements, F.A.C. Rule 17-2.640-Lowest Achievable Emission Rate (LAER) and F.A.C. Rule 17-2.700-Emission Test Procedures.

25. 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). Objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to F.A.C. Rule 17-2.100(135).

26. Pursuant to F.A.C. 17-2.210(2) Air Operating Permits, the permittee is required to submit annual reports on the actual operating rates and emissions from the facility. These reports shall include but are not limited to the following: utilization rates (lbs/yr) manufacturer's certifications, VOC emissions (tons/yr, lbs/day, and lbs/hr), test results, VOC emissions per line, VOC content, liquid waste disposed, hours of operation, fuel utilization, quantity of cans processed, etc. Annual reports shall be sent to the BESD office.

PERMITTEE: Anheuser-Busch Companies, Inc. Permit Number: AC 16-187863
Expiration Date: November 30, 1991

SPECIFIC CONDITIONS:

27. This permit replaces construction permits AC 16-127873, AC 16-57752, AC 16-57753 and AC 16-50418.

28. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

29. An application for an operation permit must be submitted to the BESD 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. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1991

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

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



ANHEUSER-BUSCH COMPANIES

RECEIVED
DER - MAIL ROOM

1990 OCT 11 PM 12: 03

October 10, 1990

Mr. Clair 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

RECEIVED
OCT 11 1990
DER - BAQM

**Re: Metal Container Corporation
Jacksonville, Florida**

Dear Mr. Fancy:

In reference to your July 24, 1990 letter, I would first like to explain the current facility permit status and current configuration of the facility. Second, I will explain the proposed changes to the facility and outline the plants configuration after these changes. A completed application for a permit to construct (modify) is also included for all equipment that is not correctly described on the current permits to operate.

Metal Container Corporation began a modernization program at the Jacksonville plant in 1986. This program included upgrading Lines 2, 3 and 4 for increased can production. When this modernization was originally proposed, Line 1 was to be taken out of service and dismantled. However, due to an increased market for cans, MCC applied for and received permits to construct for Line 1. The emissions from this line were offset by reductions achieved by ducting the printer pin ovens on Lines 2, 3 and 4 to T.O. #2. A LAER determination for Line 1 was made and required ducting the majority of the equipment on this line to T.O. #1. As your letter points out, the construction permits were modified during construction to allow time for the necessary changes to achieve the required emission reductions and capture efficiencies to be completed. The final work on Line 1 was completed on April 20, 1989 and a permit to operate (A016-164835) was issued on September 1, 1989. Permits to operate had previously been issued for Line 2 (A016-134410) on September 30, 1987, and Lines 3 and 4 (A016-141580 and A016-

141581) on February 8, 1988. Attachment A is a diagram showing the plant configuration and the ducting to the thermal oxidizers when the permits to operate were issued.

On September 22, 1989, a letter was sent to FDER (copy attached) outlining the current plant operations and requesting that minor clerical changes be made in the permits to accurately reflect our operations. No response was ever received to this letter.

On May 4, 1990 a request was sent to Mr. Ernest Frey requesting that the permits be modified to reflect some internal changes proposed by MCC. These changes included the following:

Line No. 1

- 1) Dismantle and remove the existing basecoater and basecoater pin oven.
- 2) Relocate the inside spray machines and respray machine to the second floor near the inside bake oven. This will reduce the distance the can travels from the sprayer to the oven and thereby reduce fugitive emissions.
- 3) Can bodies will be routed to the current Line 2 basecoater and basecoater pin oven. This will become the Line 1 basecoater and basecoater pin oven. However, this equipment will not be moved from its present location
- 4) The existing printer will be able to produce 16 oz cans at 1000 CPM and 12 oz cans at 1050 CPM.

Line No. 2

- 1) The basecoater and basecoater pin oven will be connected to Line No. 1 (i.e., Line 2 will no longer have the capability to produce basecoated cans).

Additionally, the basecoaters and basecoater pin oven exhausts on Line NOS. 3 and 4 will be ducted into thermal oxidizer #2 to further reduce emissions.

Attachment B is a diagram showing the plant configuration and ducting to the thermal oxidizers after these proposed changes are completed. The attached spreadsheets outline the production rates and proposed can mix after these changes are completed. The maximum hourly emissions assume that only 16 oz cans will be produced. The completed application reflects these changes, and you will note that a decrease in

permitted emissions in excess of 24 tons per year will be realized (400.3 tons/year vs 375.9 tons/year) after completion of this project. It should be noted that the coatings listed on these spreadsheets are typical of MCC coatings, but that these could be replaced with another NSPS compliant coating.

We are requesting your approval to proceed with these changes as quickly as possible to allow the plant to use their available resources more effectively. Please contact me at (314) 577-4168 if you or your staff has any questions or require additional information. As always, we appreciate your cooperation in these matters.

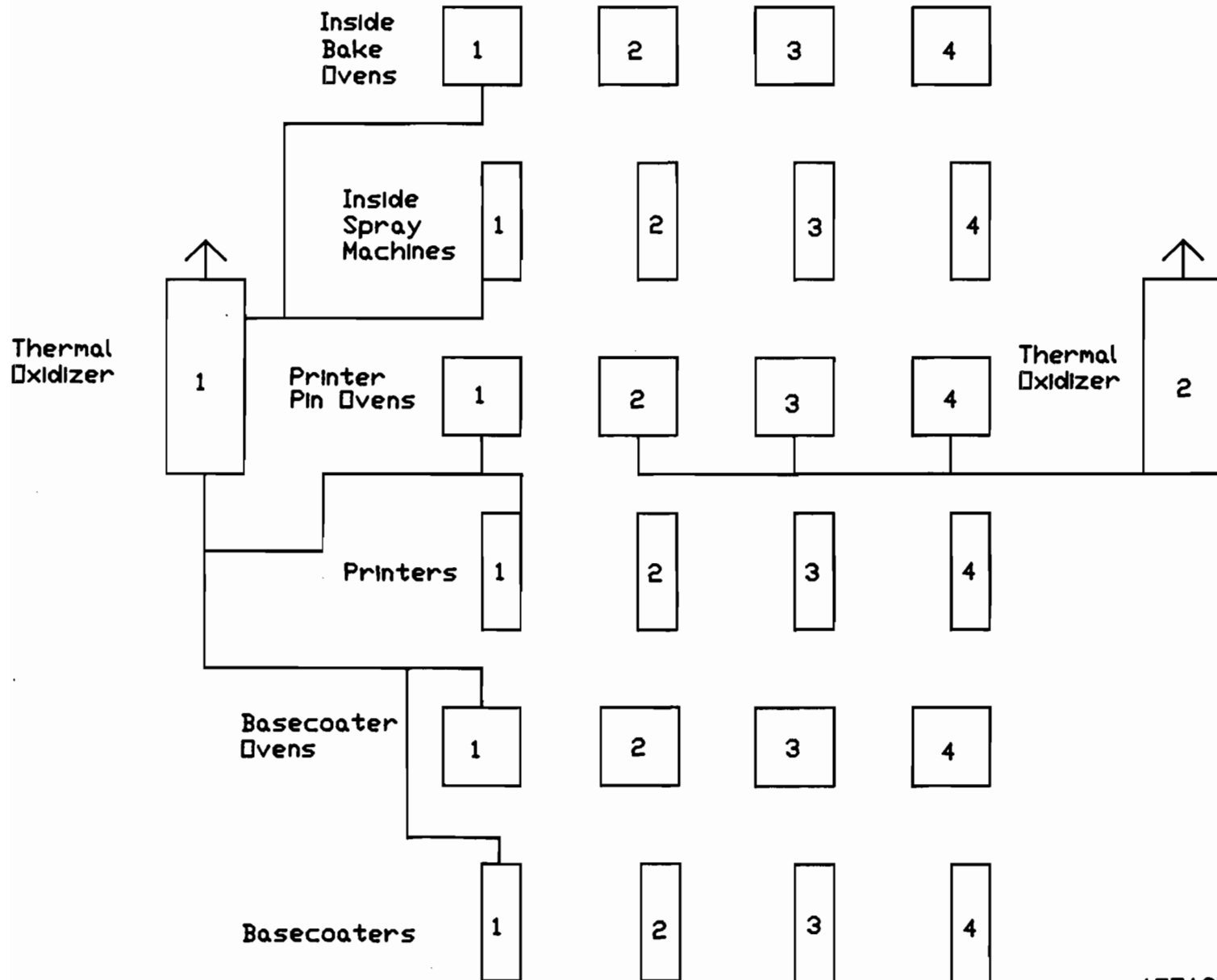
Sincerely,
ANHEUSER-BUSCH COMPANIES



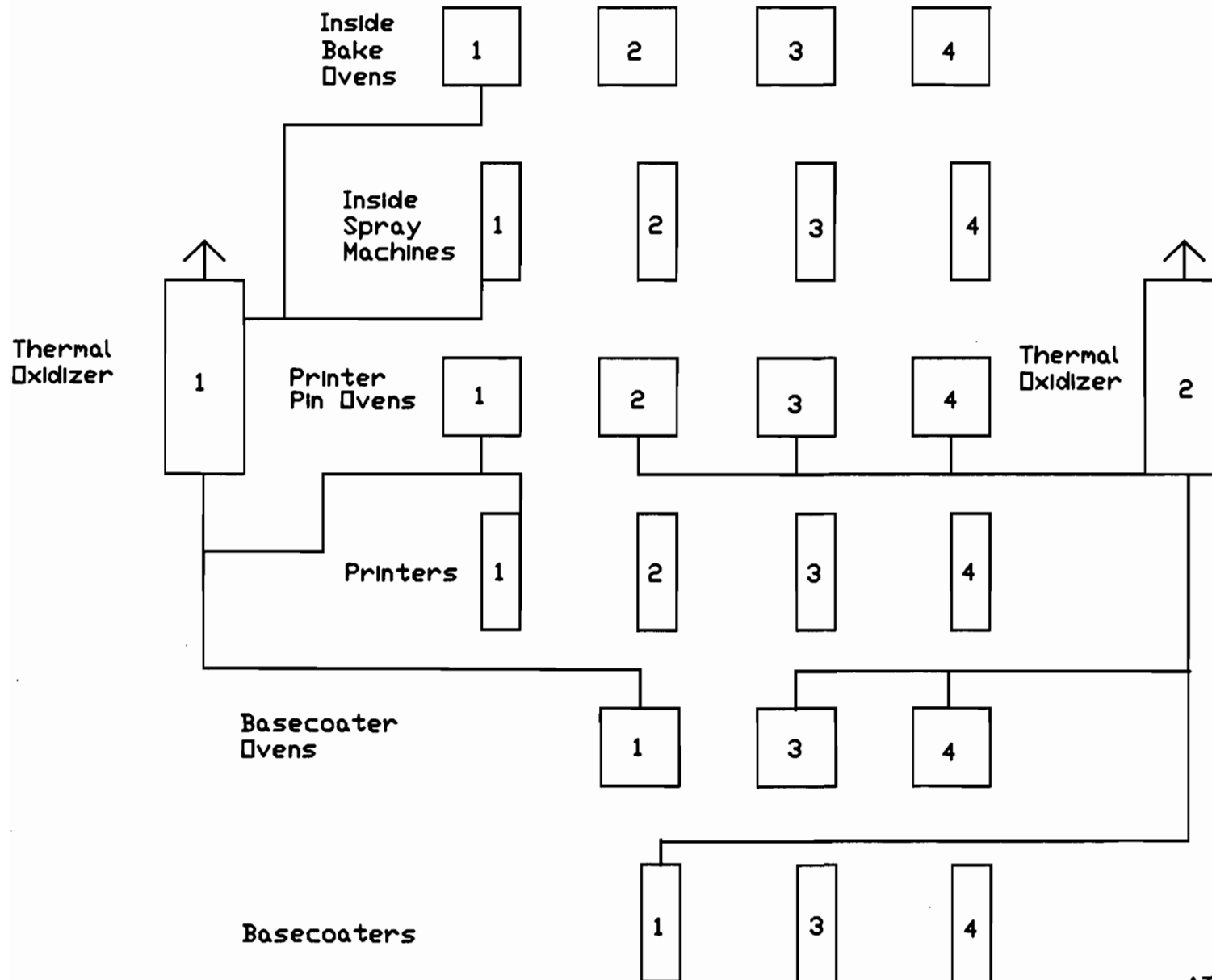
Robert M. Lanham
Environmental Engineer
Attachments

cc: J. Nelson
A. Kutynow, NE Dist.
R. Robinson, BESD

METAL CONTAINER CORPORATION JACKSONVILLE, FLORIDA



METAL CONTAINER CORPORATION JACKSONVILLE, FLORIDA





ANHEUSER-BUSCH COMPANIES

September 22, 1989

CERTIFIED MAIL

Mr. Ernest E. Frey
Deputy Assistant Secretary
Florida Department of Environ-
mental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207

Re: **Metal Container Corporation (MCC)**
A-016-164835, A-016-134410,
A-016-141580, A-016-141581

Dear Mr. Frey:

We recently received permit A-016-164835 for Line No. 1 at the Jacksonville MCC facility. With the issuance of this permit, the last phase of a modernization project which began in 1986 has been completed -- MCC now possesses operating permits for all four lines at this facility.

After receiving this permit, I took the opportunity to thoroughly review all four permits and summarize the specific conditions of each for the plant's personnel. During this review, I discovered several items which will require clarification from you. I have listed these items in the attached table and referenced each item by permit number. We are requesting that the specific conditions of these permits be amended to incorporate the changes I have listed. Please note that these are only administrative changes and will not allow any increase in emissions.

If you or any of your staff have questions concerning this request, please contact me at (314) 577-4168.

Sincerely,

ANHEUSER-BUSCH COMPANIES

Robert M. Lanham
Environmental Engineer
Attach.

cc: James L. Manning, P.E. - BESD

METAL CONTAINER CORPORATION
JACKSONVILLE, FLORIDA

LINE 1 - PERMIT AQ16-164835

- 1) COMMENT - UNDER THE LIST OF EQUIPMENT ON PAGE 1 OF 6 THE RESPRAY MACHINE HAS NOT BEEN INCLUDED IN THE LIST

JUSTIFICATION - THE ADDITION OF THIS PIECE OF EQUIPMENT WAS APPROVED PER THE MARCH 8, 1988 LETTER FROM MR DALE TWACHTMANN.

- 2) COMMENT - PERMIT INDICATES THAT PM EMISSIONS WILL BE CONTROL WITH THE USE OF A THERMAL OXIDIZER.

JUSTIFICATION - THIS SHOULD BE CHANGED TO VOC EMISSIONS

- 3) COMMENT - SPECIFIC CONDITION #8 SHOULD BE CLARIFIED TO INDICATE THAT IT IS THERMAL OXIDIZER #1 THAT NEEDS TO BE TESTED ANNUALLY.

JUSTIFICATION - THIS FACT IS REFERENCED AGAIN IN SPECIFIC CONDITION #13 AND ALSO IN THE OPERATING PERMITS FOR LINES 2, 3, & 4

LINE 2 - PERMIT AQ16-134410

- 1) COMMENT - ON PAGE 1 OF 7 IT INDICATES THAT THE BOTTOM VARNISH AND OVERVARNISH WILL BE DUCTED TO THE THERMAL OXIDIZER (T.O.) IN ACCORDANCE WITH THE JULY 22, 1988 LAER DETERMINATION. THIS SHOULD BE CLARIFIED TO INDICATE THAT THE EXHAUST FROM PRINTER OVEN #2 WILL BE DUCTED TO THE T.O.

JUSTIFICATION - THE LAER DETERMINATION STATES THAT EMISSION OFFSETS WILL BE OBTAINED BY DUCTING EMISSIONS TO THE T.O., MCC CHOSE TO DUCT THE PRINTER OVEN EXHAUST INTO THE T.O. TO ACHIEVE THE REQUIRED REDUCTION.

- 2) COMMENT - ON PAGE 1 OF 7 IT INDICATES THAT THE COATER OVEN WOULD BE DUCTED TO T.O. #1. THIS IS NOT CORRECT AND SHOULD BE CHANGED.

JUSTIFICATION - IN JOHN STIER'S FEBRUARY 6, 1987 LETTER TO MR CLAIR FANCY A REQUEST WAS MADE TO INSTALL DUCTWORK FROM THE BASECOATER OVENS TO T.O. #1 IN THE EVENT THAT A NON-COMPLIANT BASECOAT WAS USED. WHEN THE PLANT IS USING A NSPS COMPLIANT COATING THIS DUCT WOULD BE DAMPERED OFF.

- 3) COMMENT - ON PAGE 1 OF 7 IT LISTS THE VOC CONTENT FOR INTERIOR BODY SPRAY AND EXTERIOR END SPRAY AS "4.2 LB/VOC GALLON (0.34 KG/VOC)". THIS IS INCORRECT AND SHOULD BE CHANGED.

JUSTIFICATION - THE CORRECT FACTOR SHOULD BE 4.2 LB/VOC GALLON (0.50 KG/VOC)

LINE 2 (CONT)

4) COMMENT - SPECIFIC CONDITION #18 SHOWS THE MAXIMUM HEAT INPUT TO FOUR OVENS TO BE 11.9×10^6 BTUS/HR. THIS IS INCORRECT.

JUSTIFICATION - THE RENEWAL APPLICATION FOR THIS PERMIT STATES THAT THE MAXIMUM HEAT INPUT IS 19.1×10^6 BTUS/HR

LINE 3 - PERMIT AQ16-141580

1) COMMENT - ON PAGE 2 OF 7 UNDER ADDITIONAL REDUCTIONS REQUIRED IT LISTS BOTTOM VARNISH APPLICATOR, OVER VARNISH APPLICATOR, PRINTER OVEN, AND BASECOAT OVEN BEING DUCTED TO ONE OF THE T.O.'S AND STATES THAT THIS IS BASED ON THE JULY 22, 1987 LAER DETERMINATION. THIS IS INCORRECT AND SHOULD BE REVISED.

JUSTIFICATION - THE LAER DETERMINATION STATES THAT EMISSION OFFSETS WILL BE OBTAINED BY DUCTING EMISSIONS TO THE T.O., MCC CHOSE TO DUCT THE PRINTER OVEN EXHAUST INTO THE T.O. TO ACHIEVE THE REQUIRED REDUCTION.

2) COMMENT - SPECIFIC CONDITION #18 SHOWS THE MAXIMUM HEAT INPUT TO FOUR OVENS TO BE 11.9×10^6 BTUS/HR. THIS IS INCORRECT.

JUSTIFICATION - THE RENEWAL APPLICATION FOR THIS PERMIT STATES THAT THE MAXIMUM HEAT INPUT IS 19.1×10^6 BTUS/HR

LINE 4 - PERMIT AQ16-141581

1) COMMENT - ON PAGE 2 OF 7 UNDER ADDITIONAL REDUCTIONS REQUIRED IT LISTS BOTTOM VARNISH APPLICATOR, OVER VARNISH APPLICATOR, PRINTER OVEN, AND BASECOAT OVEN BEING DUCTED TO ONE OF THE T.O.'S AND STATES THAT THIS IS BASED ON THE JULY 22, 1987 LAER DETERMINATION. THIS IS INCORRECT AND SHOULD BE REVISED.

JUSTIFICATION - THE LAER DETERMINATION STATES THAT EMISSION OFFSETS WILL BE OBTAINED BY DUCTING EMISSIONS TO THE T.O., MCC CHOSE TO DUCT THE PRINTER OVEN EXHAUST INTO THE T.O. TO ACHIEVE THE REQUIRED REDUCTION.

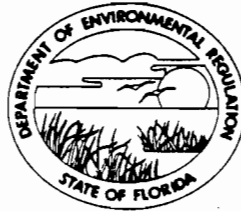
2) COMMENT - SPECIFIC CONDITION #18 SHOWS THE MAXIMUM HEAT INPUT TO FOUR OVENS TO BE 11.9×10^6 BTUS/HR. THIS IS INCORRECT.

JUSTIFICATION - THE RENEWAL APPLICATION FOR THIS PERMIT STATES THAT THE MAXIMUM HEAT INPUT IS 19.1×10^6 BTUS/HR

DEPARTMENT OF ENVIRONMENTAL REGULATION

#200pd.
10-11-90
Receipt #151189

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



AC 16-187803

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Two-piece can manufacturing [] New¹ [X] Existing¹

APPLICATION TYPE: [] Construction [] Operation [X] Modification

COMPANY NAME: Metal Container Corporation COUNTY: Duval

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) Can Lines 1, 2, 3 & 4

SOURCE LOCATION: Street 1100 N. Ellis Road City Jacksonville

UTM: East 428.440 North 3356.77

Latitude 30 ° 20 ' 15 "N Longitude 81 ° 44 ' 42 "W

APPLICANT NAME AND TITLE: Robert M. Lanham, Environmental Engineer

APPLICANT ADDRESS: One Busch Place (202-4), St. Louis, MO 63118

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 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: Gary L. Reynolds

Gary L. Reynolds, Plant Manager
Name and Title (Please Type)

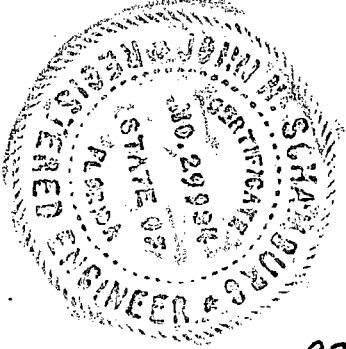
Date: 10/10/90 Telephone No. (904) 695-7600

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

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an 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
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: 10 09 90 Telephone No. (314) 957-9556

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 existing basecoater and basecoater pin oven on Line 1 will be removed. The existing basecoater and basecoater pin oven on Line 2 will now be used on Line 1. The inside spray equipment on Line 1 (sprayers & respray) will be relocated to the second floor and the inside spray elevator will be removed. Other minor changes/clarifications as shown on attached sheets.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction _____ Completion of Construction _____

C. 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.)

No additional equipment will be required for this modification.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

A-016 - 164835 issued 9/01/89 expires 6/30/94 A-016-141581 issued 2/8/88 expires 01/31/93

A-016 - 134410 issued 9/30/87 expires 8/31/92

A-016 - 141580 issued 2/08/88 expires 1/31/93

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. NO
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? _____

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. _____

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? YES

a. If yes, for what pollutants? VOC

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:

Entire Plant - see attached spreadsheet for individual lines

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
White Basecoat	VOC	8.5	229.2	
Clearcoat	voc	11.0	3.3	
Inside Spray	VOC	14.5	548.5	
(Bottom & Varnish Over)	VOC	11.0	284.2	
Inks	VOC	22.0	26.9	

Clean-up Solvents VOC 100.0 7.5

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

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 Emission lbs/hr ³	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
VOC	88	375.9			156.2	637.8	

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.

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 tone 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) _____

Brief 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 No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant	Rate or Concentration

10. Stack Parameters

- 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).

1.
 - a. Control Device: 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:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.
 - a. Control Device: 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:

¹Explain method of determining efficiency.
²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

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:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. 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:

F. Describe the control technology selected:

1. Control Device:

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:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

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:

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.

*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
SO ²	_____ 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.

METAL CONTAINER CORPORATION
 JACKSONVILLE BEVERAGE CAN MANUFACTURING FACILITY (MMANEW)
 ANNUAL EMISSIONS

SCENARIO: LINE 1 @ 1050 CPM; 90% OF 16 OZ CANS BASECOATED; 10% OF 16 OZ CANS ARE SIZECOATED; 50 % OF 12 OZ CANS ARE BASECOATED
 LINE 2 @ 1400 CPM; ALL 12 OZ CANS; NO BASECOATED CANS
 LINE 3 @ 1400 CPM; ALL 12 OZ CANS; 75% OF CANS BASECOATED
 LINE 4 @ 1400 CPM; ALL 12 OZ CANS; 75% OF CANS BASECOATED
 ALL LINES @ 100% EFFICIENCY

LINE 1 - 16 OZ CAN PRODUCTION: 6.699E+05 ANNUAL PRODUCTION AT 365 DAYS/YEAR: 2.445E+08
 LINE 1 - 12 OZ CAN PRODUCTION: 8.086E+05 2.951E+08
 LINE 2 - 12 OZ CAN PRODUCTION: 2.016E+06 7.358E+08
 LINE 3 - 12 OZ CAN PRODUCTION: 2.016E+06 7.358E+08
 LINE 4 - 12 OZ CAN PRODUCTION: 2.016E+06 7.358E+08

COATING/SOLVENT	MANUFACTURERS IDENTIFICATION	USAGE (GALS)	DENSITY (PPG)	VOC FRACTION (BY WEIGHT)	UNCONTROLLED VOC EMISSIONS (TPY)	CAPTURE EFFICIENCY (BY WEIGHT)	FUGITIVE (TPY)	VOC EMISSIONS		TOTAL (TPY)	USAGE RATE (GALS/1000 CANS)
								T.O. INLET (TPY)	T.O. OUTLET (TPY)		
LINE 1 - 12 AND 16 OUNCE CANS											
WHITE BASECOAT	PPG 3606	33,742	11.30	0.085	16.20	0.90	1.62	14.58	1.46	3.08	0.153
		16,971	11.30	0.085	8.15	0.90	0.82	7.34	0.73	1.55	0.115
SIZECOAT	PPG 3631	3,252	8.80	0.110	1.57	0.90	0.16	1.42	0.14	0.30	0.133
INSIDE SPRAY	GLID 640-C-554	64,795	8.50	0.145	39.79	0.90	3.98	35.81	3.58	7.56	0.265
		59,029	8.50	0.145	36.25	0.90	3.63	32.63	3.26	6.89	0.200
BOTTOM VARNISH	PPG 3625X	3,238	8.80	0.110	1.57	0.90	0.16	1.41	0.14	0.30	0.006
OVERVARNISH	PPG 3625X	32,601	8.80	0.110	15.78	0.90	1.58	14.20	1.42	3.00	0.133
		29,515	8.80	0.110	14.29	0.90	1.43	12.86	1.29	2.71	0.100
PRINTING INKS	VARIOUS	2,445	10.50	0.220	2.82	0.90	0.28	2.54	0.25	0.54	0.010
		2,361	10.50	0.220	2.73	0.90	0.27	2.45	0.25	0.52	0.008
CLEAN-UP SOLVENTS MISC		2,159	7.50	1.000	8.09	0.00	8.09	0.00	0.00	8.09	0.004
SUBTOTALS					147.25		22.01	125.24	12.52	34.53	

LINE 2 - ALL 12 OUNCE CANS

INSIDE SPRAY	GLID 640-C-554	147,168	8.50	0.145	90.38	0.00	90.38	0.00	0.00	90.38	0.200
BOTTOM VARNISH	PPG 3625X	4,415	8.80	0.110	2.14	0.83	0.36	1.77	0.18	0.54	0.006
OVERVARNISH	PPG 3625X	73,584	8.80	0.110	35.61	0.83	6.05	29.56	2.96	9.01	0.100
PRINTING INKS	VARIOUS	5,887	10.50	0.220	6.80	0.83	1.16	5.64	0.56	1.72	0.008
CLEAN-UP SOLVENTS MISC		2,208	7.50	1.000	8.28	0.00	8.28	0.00	0.00	8.28	0.003
SUBTOTALS					143.21		106.23	36.98	3.70	109.93	

LINE 3 - ALL 12 OUNCE CANS

WHITE BASECOAT	PPG 3606	63,466	11.30	0.085	30.48	0.90	3.05	27.43	2.74	5.79	0.115
INSIDE SPRAY	GLID 640-C-554	147,168	8.50	0.145	90.38	0.00	90.38	0.00	0.00	90.38	0.200
BOTTOM VARNISH	PPG 3625X	4,415	8.80	0.110	2.14	0.83	0.36	1.77	0.18	0.54	0.006
OVERVARNISH	PPG 3625X	73,584	8.80	0.110	35.61	0.83	6.05	29.56	2.96	9.01	0.100
PRINTING INKS	VARIOUS	5,887	10.50	0.220	6.80	0.83	1.16	5.64	0.56	1.72	0.008
CLEAN-UP SOLVENTS MISC		2,208	7.5	1.000	8.28	0.00	8.28	0.00	0.00	8.28	0.003
SUBTOTALS					173.69		109.28	64.41	6.44	115.72	

LINE 4 - ALL 12 OUNCE CANS

WHITE BASECOAT	PPG 3606	63,466	11.30	0.085	30.48	0.90	3.05	27.43	2.74	5.79	0.115
INSIDE SPRAY	GLID 640-C-554	147,168	8.50	0.145	90.38	0.00	90.38	0.00	0.00	90.38	0.200
BOTTOM VARNISH	PPG 3625X	4,415	8.80	0.110	2.14	0.83	0.36	1.77	0.18	0.54	0.006
OVERVARNISH	PPG 3625X	73,584	8.80	0.110	35.61	0.83	6.05	29.56	2.96	9.01	0.100
PRINTING INKS	VARIOUS	5,887	10.50	0.220	6.80	0.83	1.16	5.64	0.56	1.72	0.008
CLEAN-UP SOLVENTS MISC		2,208	7.50	1.000	8.28	0.00	8.28	0.00	0.00	8.28	0.003
SUBTOTALS					173.69		109.28	64.41	6.44	115.72	
FACILITY TOTALS					637.83		346.80	291.03	29.10	375.90	
EMISSIONS (TPY)					375.90						

METAL CONTAINER CORPORATION
 JACKSONVILLE BEVERAGE CAN MANUFACTURING FACILITY (MMANEW)
 MAXIMUM HOURLY EMISSIONS

SCENARIO: LINE 1 @ 1000 CPM; 90% OF 16 OZ CANS BASECOATED; 10% OF 16 OZ CANS ARE SIZECOATED
 LINE 2 @ 1400 CPM; ALL 12 OZ CANS; NO BASECOATED CANS
 LINE 3 @ 1400 CPM; ALL 12 OZ CANS; 75% OF CANS BASECOATED
 LINE 4 @ 1400 CPM; ALL 12 OZ CANS; 75% OF CANS BASECOATED
 ALL LINES @ 100% EFFICIENCY

LINE 1 - 16 OZ CAN PRODUCTION: 6.000E+04
 LINE 2 - 12 OZ CAN PRODUCTION: 8.400E+04
 LINE 3 - 12 OZ CAN PRODUCTION: 8.400E+04
 LINE 4 - 12 OZ CAN PRODUCTION: 8.400E+04

COATING/SOLVENT	MANUFACTURERS IDENTIFICATION	USAGE (GALS)	DENSITY (PPG)	VOC FRACTION (BY WEIGHT)	UNCONTROLLED VOC EMISSIONS (LBS/HR)	CAPTURE EFFICIENCY (BY WEIGHT)	FUGITIVE (LBS/HR)	VOC EMISSIONS		TOTAL (LBS/HR)	USAGE RATE (GALS/1000 CANS)
								T.O. INLET (LBS/HR)	T.O. OUTLET (LBS/HR)		
LINE 1 - 16 OUNCE CANS											
WHITE BASECOAT	PPG 3606	8	11.30	0.085	7.95	0.90	0.80	7.16	0.72	1.51	0.153
SIZECOAT	PPG 3631	1	8.80	0.110	0.77	0.90	0.08	0.70	0.07	0.15	0.133
INSIDE SPRAY	GLID 640-C-554	16	8.50	0.145	19.53	0.90	1.95	17.58	1.76	3.71	0.265
BOTTOM VARNISH	PPG 3625X	0	8.80	0.110	0.35	0.90	0.03	0.31	0.03	0.07	0.006
OVERVARNISH	PPG 3625X	8	8.80	0.110	7.74	0.90	0.77	6.97	0.70	1.47	0.133
PRINTING INKS	VARIOUS	1	10.50	0.220	1.39	0.90	0.14	1.25	0.12	0.26	0.010
CLEAN-UP SOLVENTS MISC		0	7.50	1.000	1.80	0.00	1.80	0.00	0.00	1.80	0.004
SUBTOTALS					39.53		5.57	33.96	3.40	8.97	

LINE 2 - ALL 12 OUNCE CANS

INSIDE SPRAY	GLID 640-C-554	17	8.50	0.145	20.63	0.00	20.63	0.00	0.00	20.63	0.200
BOTTOM VARNISH	PPG 3625X	1	8.80	0.110	0.49	0.83	0.08	0.40	0.04	0.12	0.006
OVERVARNISH	PPG 3625X	8	8.80	0.110	8.13	0.83	1.38	6.75	0.67	2.06	0.100
PRINTING INKS	VARIOUS	1	10.50	0.220	1.55	0.83	0.26	1.29	0.13	0.39	0.008
CLEAN-UP SOLVENTS MISC		0	7.50	1.000	1.89	0.00	1.89	0.00	0.00	1.89	0.003
SUBTOTALS					32.70		24.25	8.44	0.84	25.10	

LINE 3 - ALL 12 OUNCE CANS

WHITE BASECOAT	PPG 3606	10	11.30	0.085	9.28	0.90	0.93	8.35	0.84	1.76	0.115
INSIDE SPRAY	GLID 640-C-554	17	8.50	0.145	20.63	0.00	20.63	0.00	0.00	20.63	0.200
BOTTOM VARNISH	PPG 3625X	1	8.80	0.110	0.49	0.83	0.08	0.40	0.04	0.12	0.006
OVERVARNISH	PPG 3625X	8	8.80	0.110	8.13	0.83	1.38	6.75	0.67	2.06	0.100
PRINTING INKS	VARIOUS	1	10.50	0.220	1.55	0.83	0.26	1.29	0.13	0.39	0.008
CLEAN-UP SOLVENTS MISC		0	7.5	1.000	1.89	0.00	1.89	0.00	0.00	1.89	0.003
SUBTOTALS					41.97		25.18	16.79	1.68	26.86	

LINE 4 - ALL 12 OUNCE CANS

WHITE BASECOAT	PPG 3606	10	11.30	0.085	9.28	0.90	0.93	8.35	0.84	1.76	0.115
INSIDE SPRAY	GLID 640-C-554	17	8.50	0.145	20.63	0.00	20.63	0.00	0.00	20.63	0.200
BOTTOM VARNISH	PPG 3625X	1	8.80	0.110	0.49	0.83	0.08	0.40	0.04	0.12	0.006
OVERVARNISH	PPG 3625X	8	8.80	0.110	8.13	0.83	1.38	6.75	0.67	2.06	0.100
PRINTING INKS	VARIOUS	1	10.50	0.220	1.55	0.83	0.26	1.29	0.13	0.39	0.008
CLEAN-UP SOLVENTS MISC		0	7.50	1.000	1.89	0.00	1.89	0.00	0.00	1.89	0.003
SUBTOTALS					41.97		25.18	16.79	1.68	26.86	
FACILITY TOTALS					156.18		80.19	75.99	7.60	87.79	
EMISSIONS (LBS/HR)					87.79						

BEST AVAILABLE COPY



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

000266

CHECK NO.	000266	DATE	8/22/90	VENDOR NO.	
VENDOR	Fla. Dept. of Environmental Regula.				

VOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	GROSS AMOUNT	DISCOUNTS, TAXES, RETENTION	NET AMOUNT
		Air Permit Application Fee for Jacksonville Line #1 changes			

TOTALS →	GROSS AMOUNT	NET AMOUNT
	\$200.00	\$200.00

DETACH BEFORE DEPOSITING



Metal Container Corporation

ONE OF THE ANHEUSER-BUSCH COMPANIES

000266

CHECK DATE	CHECK NUMBER
8/22/90	000266

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

VOID 180 DAYS AFTER ISSUANCE

62-26
311

2338

PAY THIS AMOUNT

\$ *****200.00*****

Florida Department of Environmental Regulation

METAL CONTAINER CORPORATION

J.P. Sumner
AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

TO THE ORDER OF:

P 256 396 156

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 Robert Larham	
Street and No. Onheuser-Busen	
P.O., State and ZIP Code St. Louis, Missouri	
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 8-7-90	
AC 16-127873	
16-50418	
57752	
57753	



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

July 24, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Lanham:

Re: Requested Amendment of Permit No. AC 16-127873
AC 16-50418
AC 16-57752
AC 16-57753

The Department has received your May 4 letter from BESD on June 20, requesting the referenced permits be amended to include the removal of some existing equipment and transfer of other equipment from line No. 2 to line No. 1 at your Jacksonville plant. The Department has concluded that further amendments to the referenced permits are not appropriate. We have found that permits with many amendments cause potential confusion for both the environmental agencies and the source owner.

On July 20, 1987, the Department issued construction permit No. AC 16-127873 which authorized can coating line No. 1 to operate as indicated in the application submitted on September 21, 1986. On March 4, 1987, you requested permission to install ducts needed to vent the three basecoated oven exhausts to the existing thermal oxidizers. On March 8, 1988, you requested that the inside re-spray machine be included as part of the equipment for can coating line No. 1 (AC 16-127873). On September 13, 1988, an extension in the expiration date of the permit was approved to complete engineering modifications in order to improve capture efficiency. Although, these changes have been approved by the Department, neither your September 21, 1986, application or permits No. AC 16-127873, -50418, -57752, and -57753 reflect the actual status of your coating operations. Therefore, the Department requests Metal Container Company submit a complete application for a permit to construct (modify) can coating lines (No. 1, 2, 3, & 4) within 60 days of the receipt of this letter that will reflect the conditions you intend to operate.

If the permitted emissions for your facility (400.3 Tons VOC per year) are not increased, the application fee will be \$200. We will process this application as quickly as possible to minimize delays in this project.

Mr. Robert M. Lanham
Page 2
July 24, 1990

If you have any questions on this matter, please call Teresa Heron at (904)488-1344 or write to me at the Department's Tallahassee address.

Sincerely,



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

CHF/TH/plm

c: Andy Kutyna, NE District
Ron Roberson, BESD

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services

RECEIVED

JUN 20 1990

DER - BAQM



June 18, 1990

Mr. Clair Fancy, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32301-8241

**Re: Metal Container Corporation
Can Coating Lines 1 - 4
Anheuser-Busch Companies Revision Request Letters
Dated September 22, 1989 and May 4, 1990**

Dear Mr. Fancy:

In accordance with the permitting agreement between the districts (local programs) and the Central Air Permitting Section, the captioned revision request letters are being forwarded to your office for review.

If Bio-Environmental Services may be of further assistance in this matter, Please advise.

Very truly yours,

Darrel J. Hall
Pollution Control Specialist

DJH/rlj:3/5

Enclosures

cc: Mr. Andrew G. Kutyna, P.E., DER
BESD Air Permitting File
BESD File 1860-C, D, E, F

S. Deon

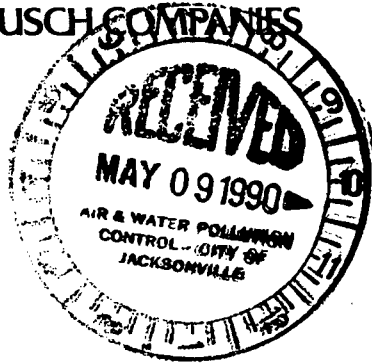


D. Hall



ANHEUSER-BUSCH COMPANIES

May 4, 1990



Mr. Ernest Frey
Deputy Assistant Secretary
Florida Department of
Environmental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207

Re: **Metal Container Corporation**
Jacksonville, Florida

Dear Mr. Frey:

The purpose of this letter is to inform you of some internal equipment changes Metal Container Corporation would like to make at the Jacksonville plant. These changes include the removal of some existing equipment and the transfer of some equipment from Line No. 2 to Line No. 1. Specifically, these changes would include:

Line No. 1

- 1) Dismantle and remove the existing basecoater and basecoater pin oven.
- 2) Relocate the inside spray machines and respray machine to the second floor near the Inside Bake oven. This will reduce the distance the can travels from the sprayer to the oven and thereby reduce fugitive emissions.
- 3) Change out the gears in the existing printer to enable the line to produce 1200 CPM. The printer is currently the limiting factor on production on this line.
- 4) Can bodies will be routed to the current Line 2 basecoater and basecoater pin oven. This will become the Line 1 basecoater and basecoater pin oven. However, this equipment will not be moved from its present location.

Line No. 2

- 1) The basecoater and basecoater pin oven will be connected to Line No. 1 (i.e., Line 2 will no longer have the capability to produce basecoated cans).

Additionally, the basecoaters and basecoater pin oven exhausts on Line Nos. 3 and 4 will be ducted into thermal oxidizer #2 to further reduce emissions.

The attached spreadsheet outlines the production rates and proposed can mix scenario after these changes are completed. No emissions increase will occur due to these changes; rather after this project is completed, a **decrease** in allowable emissions in excess of eighteen (18) tons per year will be realized.

We are requesting your approval to proceed with these changes as the Plant would like to proceed as quickly as possible to better enable them to use their resources more effectively. Please contact me at (314) 577-4168 with any questions or if you require any additional information. As always, we appreciate your cooperation in these matters.

Sincerely,

ANHEUSER-BUSCH COMPANIES, INC.



Robert M. Lanham
Environmental Engineer
Attachment
RML:cd
RML503-2

cc: Mr. D. Hall-BESD <

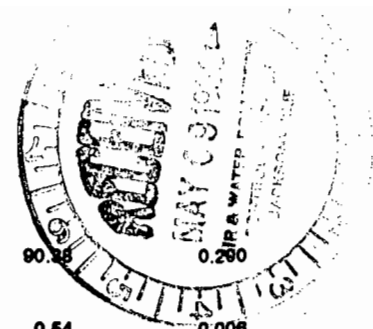
METAL CONTAINER CORPORATION
 JACKSONVILLE BEVERAGE CAN MANUFACTURING FACILITY (MMANEW)
 REVISED EMISSION INVENTORY PER MMA LETTER OF 3/29/90



SCENARIO: LINE 1 @ 1200 CPM; 90% OF 16 OZ CANS BASECOATED; 10% OF 16 OZ CANS ARE SIZECOATED; 50 % OF 12 OZ CANS ARE BASECOATED
 LINE 2 @ 1400 CPM; ALL 12 OZ CANS; NO BASECOATED CANS
 LINE 3 @ 1400 CPM; ALL 12 OZ CANS; 75% OF CANS BASECOATED
 LINE 4 @ 1400 CPM; ALL 12 OZ CANS; 75% OF CANS BASECOATED
 ALL LINES @ 100% EFFICIENCY

LINE 1 - 16 OZ CAN PRODUCTION: 8.039E+05 ANNUAL PRODUCTION AT 365 DAYS/YEAR: 2.934E+08
 LINE 1 - 12 OZ CAN PRODUCTION: 9.241E+05 3.373E+08
 LINE 2 - 12 OZ CAN PRODUCTION: 2.018E+06 7.358E+08
 LINE 3 - 12 OZ CAN PRODUCTION: 2.018E+06 7.358E+08
 LINE 4 - 12 OZ CAN PRODUCTION: 2.018E+06 7.358E+08

COATING/SOLVENT	MANUFACTURERS IDENTIFICATION	USAGE (GALS)	DENSITY (PPG)	VOC FRACTION (BY WEIGHT)	UNCONTROLLED	CAPTURE	FUGITIVE (TPY)	VOC EMISSIONS		TOTAL (TPY)	USAGE RATE (GALS/1000 CANS)
					VOC EMISSIONS (TPY)	EFFICIENCY (BY WEIGHT)		T.O. INLET (TPY)	T.O. OUTLET (TPY)		
LINE 1 - 12 AND 16 OUNCE CANS											
WHITE BASECOAT	PPG 3806	40,491	11.30	0.085	19.45	0.90	1.94	17.50	1.75	3.69	0.153
		19,395	11.30	0.085	9.31	0.90	0.93	8.38	0.84	1.77	0.115
SIZECOAT	PPG 3831	3,902	8.80	0.110	1.89	0.90	0.19	1.70	0.17	0.36	0.133
INSIDE SPRAY	GLID 640-C-554	77,754	8.50	0.145	47.75	0.90	4.78	42.98	4.30	9.07	0.265
		67,482	8.50	0.145	41.43	0.90	4.14	37.29	3.73	7.87	0.200
BOTTOM VARNISH	PPG 3825X	3,784	8.80	0.110	1.83	0.90	0.18	1.65	0.16	0.35	0.006
OVERVARNISH	PPG 3825X	39,121	8.80	0.110	18.93	0.90	1.89	17.04	1.70	3.60	0.133
		33,731	8.80	0.110	16.33	0.90	1.63	14.69	1.47	3.10	0.100
PRINTING INKS	VARIOUS	2,934	10.50	0.220	3.39	0.90	0.34	3.05	0.31	0.64	0.010
		2,698	10.50	0.220	3.12	0.90	0.31	2.81	0.28	0.69	0.008
CLEAN-UP SOLVENTS MISC		2,523	7.50	1.000	9.46	0.00	9.46	0.00	0.00	9.46	0.004
SUBTOTALS					172.89		25.80	147.08	14.71	40.51	



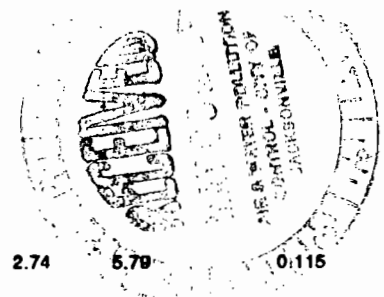
LINE 2 - ALL 12 OUNCE CANS

INSIDE SPRAY	GLID 640-C-554	147,168	8.50	0.145	90.38	0.00	90.38	0.00	0.00	90.38	0.200
BOTTOM VARNISH	PPG 3625X	4,415	8.80	0.110	2.14	0.83	0.36	1.77	0.18	0.54	0.006
OVERVARNISH	PPG 3625X	73,584	8.80	0.110	35.81	0.83	6.05	29.56	2.96	9.01	0.100
PRINTING INKS	VARIOUS	5,887	10.50	0.220	6.80	0.83	1.16	5.64	0.56	1.72	0.008
CLEAN-UP SOLVENTS MISC		2,208	7.50	1.000	8.28	0.00	8.28	0.00	0.00	8.28	0.003
SUBTOTALS					143.21		106.23	36.98	3.70	109.93	

LINE 3 - ALL 12 OUNCE CANS

WHITE BASECOAT	PPG 3606	63,466	11.30	0.085	30.48	0.90	3.05	27.43	2.74	5.79	0.115
INSIDE SPRAY	GLID 640-C-554	147,168	8.50	0.145	90.38	0.00	90.38	0.00	0.00	90.38	0.200
BOTTOM VARNISH	PPG 3625X	4,415	8.80	0.110	2.14	0.83	0.36	1.77	0.18	0.54	0.006
OVERVARNISH	PPG 3625X	73,584	8.80	0.110	35.81	0.83	6.05	29.56	2.96	9.01	0.100
PRINTING INKS	VARIOUS	5,887	10.50	0.220	6.80	0.83	1.16	5.64	0.56	1.72	0.008
CLEAN-UP SOLVENTS MISC		2,208	7.5	1.000	8.28	0.00	8.28	0.00	0.00	8.28	0.003
SUBTOTALS					173.89		109.28	64.41	6.44	115.72	

BEST AVAILABLE COPY



LINE 4 - ALL 12 OUNCE CANS

WHITE BASECOAT	PPG 3808	63,466	11.30	0.085	30.48	0.90	3.05	27.43	2.74	5.79	0.115
INSIDE SPRAY	GLID 640-C-554	147,166	8.50	0.145	90.38	0.00	90.38	0.00	0.00	90.38	0.200
BOTTOM VARNISH	PPG 3825X	4,415	8.80	0.110	2.14	0.83	0.38	1.77	0.18	0.54	0.006
OVERVARNISH	PPG 3825X	73,584	8.80	0.110	35.61	0.83	6.05	29.56	2.96	9.01	0.100
PRINTING INKS	VARIOUS	5,887	10.50	0.220	6.80	0.83	1.16	5.64	0.56	1.72	0.008
CLEAN-UP SOLVENTS MISC		2,208	7.50	1.000	8.28	0.00	8.28	0.00	0.00	8.28	0.003
SUBTOTALS					173.69		109.28	64.41	6.44	115.72	
FACILITY TOTALS					663.47		350.59	312.88	31.29	381.88	
EMISSIONS (TPY)					381.88						



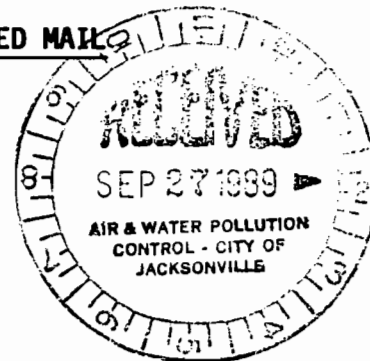
ANHEUSER-BUSCH COMPANIES

Tutt WA
Roberson B

September 22, 1989

Mr. Ernest E. Frey
Deputy Assistant Secretary
Florida Department of Environ-
mental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207

CERTIFIED MAIL



Re: **Metal Container Corporation (MCC)**
A-016-164835, A-016-134410,
A-016-141580, A-016-141581

Dear Mr. Frey:

We recently received permit A-016-164835 for Line No. 1 at the Jacksonville MCC facility. With the issuance of this permit, the last phase of a modernization project which began in 1986 has been completed -- MCC now possesses operating permits for all four lines at this facility.

After receiving this permit, I took the opportunity to thoroughly review all four permits and summarize the specific conditions of each for the plant's personnel. During this review, I discovered several items which will require clarification from you. I have listed these items in the attached table and referenced each item by permit number. We are requesting that the specific conditions of these permits be amended to incorporate the changes I have listed. Please note that these are only administrative changes and will not allow any increase in emissions.

If you or any of your staff have questions concerning this request, please contact me at (314) 577-4168.

Sincerely,

ANHEUSER-BUSCH COMPANIES

Robert M. Lanham
Environmental Engineer
Attach.

cc: James L. Manning, P.E. - BESD

**METAL CONTAINER CORPORATION
JACKSONVILLE, FLORIDA**

LINE 1 - PERMIT AQ16-164835

- 1) COMMENT - UNDER THE LIST OF EQUIPMENT ON PAGE 1 OF 6 THE RESPRAY MACHINE HAS NOT BEEN INCLUDED IN THE LIST

JUSTIFICATION - THE ADDITION OF THIS PIECE OF EQUIPMENT WAS APPROVED PER THE MARCH 8, 1988 LETTER FROM MR DALE TWACHTMANN.

- 2) COMMENT - PERMIT INDICATES THAT PM EMISSIONS WILL BE CONTROL WITH THE USE OF A THERMAL OXIDIZER.

JUSTIFICATION - THIS SHOULD BE CHANGED TO VOC EMISSIONS

- 3) COMMENT - SPECIFIC CONDITION #8 SHOULD BE CLARIFIED TO INDICATE THAT IT IS THERMAL OXIDIZER #1 THAT NEEDS TO BE TESTED ANNUALLY.

JUSTIFICATION - THIS FACT IS REFERENCED AGAIN IN SPECIFIC CONDITION #13 AND ALSO IN THE OPERATING PERMITS FOR LINES 2, 3, & 4

LINE 2 - PERMIT AQ16-134410

- 1) COMMENT - ON PAGE 1 OF 7 IT INDICATES THAT THE BOTTOM VARNISH AND OVERVARNISH WILL BE DUCTED TO THE THERMAL OXIDIZER (T.O.) IN ACCORDANCE WITH THE JULY 22, 1988 LAER DETERMINATION. THIS SHOULD BE CLARIFIED TO INDICATE THAT THE EXHAUST FROM PRINTER OVEN #2 WILL BE DUCTED TO THE T.O.

JUSTIFICATION - THE LAER DETERMINATION STATES THAT EMISSION OFFSETS WILL BE OBTAINED BY DUCTING EMISSIONS TO THE T.O., MCC CHOSE TO DUCT THE PRINTER OVEN EXHAUST INTO THE T.O. TO ACHIEVE THE REQUIRED REDUCTION.

- 2) COMMENT - ON PAGE 1 OF 7 IT INDICATES THAT THE COATER OVEN WOULD BE DUCTED TO T.O. #1. THIS IS NOT CORRECT AND SHOULD BE CHANGED.

JUSTIFICATION - IN JOHN STIER'S FEBRUARY 6, 1987 LETTER TO MR CLAIR FANCY A REQUEST WAS MADE TO INSTALL DUCTWORK FROM THE BASECOATER OVENS TO T.O. #1 IN THE EVENT THAT A NON-COMPLIANT BASECOAT WAS USED. WHEN THE PLANT IS USING A NSPS COMPLIANT COATING THIS DUCT WOULD BE DAMPERED OFF.

- 3) COMMENT - ON PAGE 1 OF 7 IT LISTS THE VOC CONTENT FOR INTERIOR BODY SPRAY AND EXTERIOR END SPRAY AS "4.2 LB/VOC GALLON (0.34 KG/VOC)". THIS IS INCORRECT AND SHOULD BE CHANGED.

JUSTIFICATION - THE CORRECT FACTOR SHOULD BE 4.2 LB/VOC GALLON (0.50 KG/VOC)

LINE 2 (CONT)

4) COMMENT - SPECIFIC CONDITION #18 SHOWS THE MAXIMUM HEAT INPUT TO FOUR OVENS TO BE 11.9×10^6 BTUS/HR. THIS IS INCORRECT.

JUSTIFICATION - THE RENEWAL APPLICATION FOR THIS PERMIT STATES THAT THE MAXIMUM HEAT INPUT IS 19.1×10^6 BTUS/HR

LINE 3 - PERMIT AQ16-141580

1) COMMENT - ON PAGE 2 OF 7 UNDER ADDITIONAL REDUCTIONS REQUIRED IT LISTS BOTTOM VARNISH APPLICATOR, OVER VARNISH APPLICATOR, PRINTER OVEN, AND BASECOAT OVEN BEING DUCTED TO ONE OF THE T.O.'S AND STATES THAT THIS IS BASED ON THE JULY 22, 1987 LAER DETERMINATION. THIS IS INCORRECT AND SHOULD BE REVISED.

JUSTIFICATION - THE LAER DETERMINATION STATES THAT EMISSION OFFSETS WILL BE OBTAINED BY DUCTING EMISSIONS TO THE T.O., MCC CHOSE TO DUCT THE PRINTER OVEN EXHAUST INTO THE T.O. TO ACHIEVE THE REQUIRED REDUCTION.

2) COMMENT - SPECIFIC CONDITION #18 SHOWS THE MAXIMUM HEAT INPUT TO FOUR OVENS TO BE 11.9×10^6 BTUS/HR. THIS IS INCORRECT.

JUSTIFICATION - THE RENEWAL APPLICATION FOR THIS PERMIT STATES THAT THE MAXIMUM HEAT INPUT IS 19.1×10^6 BTUS/HR

LINE 4 - PERMIT AQ16-141581

1) COMMENT - ON PAGE 2 OF 7 UNDER ADDITIONAL REDUCTIONS REQUIRED IT LISTS BOTTOM VARNISH APPLICATOR, OVER VARNISH APPLICATOR, PRINTER OVEN, AND BASECOAT OVEN BEING DUCTED TO ONE OF THE T.O.'S AND STATES THAT THIS IS BASED ON THE JULY 22, 1987 LAER DETERMINATION. THIS IS INCORRECT AND SHOULD BE REVISED.

JUSTIFICATION - THE LAER DETERMINATION STATES THAT EMISSION OFFSETS WILL BE OBTAINED BY DUCTING EMISSIONS TO THE T.O., MCC CHOSE TO DUCT THE PRINTER OVEN EXHAUST INTO THE T.O. TO ACHIEVE THE REQUIRED REDUCTION.

2) COMMENT - SPECIFIC CONDITION #18 SHOWS THE MAXIMUM HEAT INPUT TO FOUR OVENS TO BE 11.9×10^6 BTUS/HR. THIS IS INCORRECT.

JUSTIFICATION - THE RENEWAL APPLICATION FOR THIS PERMIT STATES THAT THE MAXIMUM HEAT INPUT IS 19.1×10^6 BTUS/HR