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

Title V Air Operation Permit Renewal

PROPOSED Permit Project No.: 0010046-007-AV

<u>Permitting and Compliance Authority:</u>

State of Florida
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Telephone: 904/807-3300
FAX: 904/448-4363

Title V Air Operation Permit Renewal

PROPOSED Permit No.: 0010046-007-AV

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Florida Department of
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Northeast District
7825 Baymeadows Way, Suite B200
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee: PROPOSED Permit No.: 0010046-007-AV

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

Facility ID No.: 0010046
SIC No(s).: 34
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit and to change EU001's name. This existing facility is located 5909 N.W. 18th Drive, Gainesville, Alachua County, Florida; UTM Coordinates: Zone 17, 369.4 km East and 3287.2 km North; and, Latitude: 29° 42′ 05″ North and Longitude: 82° 20′ 53″ West.

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

Referenced attachments made a part of this permit:
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/06

Effective Date: [ARMS Day 55**]**
Renewal Application Due Date: [Month day, year]
Expiration Date: [Month day, year]

DRAFT

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

CLK: lm

Section I. Facility Information.

Subsection A. Facility Description.

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

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

The facility also utilizes a solvent (heptane) for cleaning metal surfaces during routine maintenance operations. All solvent receptacles are equipped with covers that remain closed when not in use. The facility has installed a solvent recovery distillation unit to purify heptane recovered from the manufacturing process.

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

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

Based on the Title V Air Operation Permit Renewal application received March 27, 2008, this facility is not a major source of hazardous air pollutants (HAPs).

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

E.U. ID No.	Brief Description
-001	Lid Module Nos. 1,2 & 3

Subsection C. Relevant Documents.

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

<u>These documents are provided to the permittee for information purposes only:</u>
Table 1-1: Summary of Air Pollutant Standards and Terms
Table 2-1: Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

<u>These documents are on file with the permitting authority:</u>
Initial Title V Air Operation Permit issued April 13, 1998
Title V Air Operation Permit Administrative Correction issued February 14, 2008
Application for a Title V Air Operation Permit Renewal received March 27, 2008

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. [Not federally enforceable.] General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Air Construction Permit AC01-265409/PSD-FL-153A]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.
Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

a. Maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.;
b. 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;
c. All fittings, valves, lines, etc., shall be properly maintained; and
d. All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

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

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS):

The following requirements are "not federally enforceable":

a. Chemical or water application to unpaved yard areas;
b. Paving and maintenance of roads, parking areas and yards;
c. Landscaping or planting of vegetation; and
d. Other techniques, as necessary.

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

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

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Northeast District Air Program office.

Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Telephone: 904/807-3300; FAX: 904/448-4363

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

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-001	Lid Module Nos. 1,2 & 3

Emission Unit 001 identifies Lid Module Nos. 1,2 & 3, cleanup activities, including maintenance solvent cleaning, the solvent recovery distillation unit, and the two end seal compound storage tanks. Process emissions associated with these activities are emitted to the atmosphere through the general building ventilation system that consists of a series of building stacks and vents.

{Permitting note(s): This emissions unit is regulated under Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD): Permit No. PSD-FL-153A; Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated August 23, 1995. Air Construction Permit (Permit No. 0190011-004-AC) was issued, on September 01, 2000, to reclassify the facility as a PSD Synthetic Minor Source by limiting annual VOC emissions to 249 tons.}

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

Essential Potential to Emit (PTE) Parameters

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

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

[Air Construction Permit AC01-265409/PSD-FL-153A, and, 0010046-004-AC]

A.2. The Permittee shall not use coatings with a VOC content greater than those stated in **Specific Condition A.1.**
[Air Construction Permit AC01-265409/PSD-FL-153A.]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; Air Construction Permit AC01-265409/PSD-FL-153A]

Emission Limitations and Standards

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

A.4. VOC. Volatile Organic Compound emissions shall not exceed 249 tons per consecutive 12 months.
[Air Construction Permit 0010046-004-AC.]

A.5. Odor. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants that cause or contribute to an objectionable odor from this emissions unit.
[Air Construction Permit AC01-265409/PSD-FL-153A.]

Test Methods and Procedures

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

A.6. VOC Content. Compliance with the VOC content of each coating stated in Specific Condition A.1., shall be determined by either EPA Method 24 or 24A as described in 40 CFR 60 Appendix A and adopted by reference in Rule 62-297, F.A.C. The methods outlined in EPA Document EPA 450/3-84-019 may be used to determine compliance in lieu of the Method 24 or 24A tests.
[Air Construction Permit AC01-265409/PSD-FL-153A.]

A.7. New coatings or those supplied by another manufacturer shall be tested via the methods stated in **Specific condition A.6**. prior to initial use in production.
[Air Construction Permit AC01-265409/PSD-FL-153A.]

A.8. Each coating shall be tested after dilution with the maximum amount of solvent used by the permittee for production.
[Air Construction Permit AC01-265409/PSD-FL-153A.]

Monitoring of Operations

A.9. Determination of Process Variables.
(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

A.9. Continued:

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

Recordkeeping and Reporting Requirements

A.10. The Permittee shall provide prior written notification to the Northeast District Office of the proposed use of any coating or solvent that was not included in the AC01-265409 permit application with a VOC content greater than that is permitted. The notification shall include the VOC content test results as outlined in **Specific Condition A.6.**
[Air Construction Permit AC01-265409/PSD-FL-153A.]

A.11. Material Safety and Data Sheets shall be maintained for all materials that are used by the facility.
[Air Construction Permit AC01-265409/PSD-FL-153A.]

A.12. The permittee shall maintain a record of the clean-up solvents used at the facility on a twelve-month basis.
[Air Construction Permit AC01-265409/PSD-FL-153A.]

A.13. Compliance shall be determined by recording VOC emissions in lb/month and ton/yr for each material used that contains VOC. This shall be based on material balance reports.

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

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

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

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

Reporting Period	Report Due Date
January - June	August 15
July - December	March 1[1]

[1]The annual operating report for that calendar year shall be submitted in lieu of the July -December semi-annual report. The second semi-annual report shall be due on March 1 of the following calendar year (Same date as the AOR).

[Rules 62-4.070(3) and 62-213.440, F.A.C., Air Construction Permit 0010046-004-AC, and Applicant request dated August 19, 2003]