

COMMISSION

Kevin Beckner      Lesley "Les" Miller, Jr.  
Victor D. Crist      Sandra L. Murman  
Ken Hagan          Stacy White  
Al Higginbotham



EXECUTIVE DIRECTOR  
Janet L. Dougherty

DIVISION DIRECTORS

Legal & Admin.	Richard Tschantz, Esq.
Air Management	Jerry Campbell, P.E.
Waste Management	Hooshang Boostani, P.E.
Water Management	Sam Elrabi, P.E.
Wetlands Management	Kelly Bishop, P.G.

Robert Myers  
Plant Manager  
Ball Metal Beverage Container Corporation  
4700 Whiteway Drive  
Tampa, Florida 33617

RE: Permit No. 0570160-016-AV  
Ball Metal Beverage Container Corporation  
Title V Air Operation Permit Renewal

Dear Mr. Myers:

Enclosed is the draft/proposed permit package to renew the Title V air operation permit for Ball Metal Beverage Container Corporation. This facility is located in Hillsborough County at 4700 Whiteway Drive, Tampa, FL 33617. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V renewal.
- The renewed draft/proposed Title V air operation permit, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the draft/proposed permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permit must be published as soon as possible and the proof of publication must be provided to the EPCHC within seven days of the date of publication. Because this permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ana Oquendo at EPA Region 4 at the following address:  
[Oquendo.Ana@epa.gov](mailto:Oquendo.Ana@epa.gov).

*An agency with values of environmental stewardship, fairness, and cooperation*

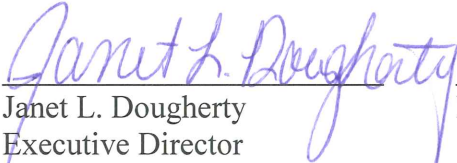
**Roger P. Stewart Center**

**3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - [www.epchc.org](http://www.epchc.org)**

*An Affirmative Action / Equal Opportunity Employer*

If you have any questions, please contact Diana M. Lee, P.E. by telephone at 813-627-2600 x1276 or by email at [lee@epchc.org](mailto:lee@epchc.org).

Executed in (City), Florida.

 2-19-16  
Janet L. Dougherty      Date  
Executive Director

Enclosures

JLD/LAW/law

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

---

In the Matter of an  
Application for a Renewal Title V Air Operation Permit by:

Ball Metal Beverage Container Corporation  
4700 Whiteway Drive  
Tampa, FL 33617

Permit No. 0570160-016-AV  
Facility ID No. 0570160  
Ball Metal Beverage Container  
Corporation

*Responsible Official:*  
Robert Myers, Plant Manager

Title V Air Operation Permit Renewal  
Hillsborough County, Florida

**Facility Location:** Ball Metal Beverage Container Corporation operates the existing facility, which is located in Hillsborough County at 4700 Whiteway Drive, Tampa, FL 33617.

**Project:** The purpose of this project is to renew the Title V air operation permit No. 0570160-015-AV. Details of the project are provided in the application and the referenced Statement of Basis.

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Environmental Protection Commission of Hillsborough County is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical/mailling address is: 3629 Queen Palm Drive, Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed Title V air operation permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website:

<https://fldep.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permits:** The Permitting Authority gives notice of its intent to issue a revised Title V air operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a proposed permit and subsequent final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

---

Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Environmental Protection Commission of Hillsborough County's Legal Office, 3629 Queen Palm Drive, Tampa, FL 33619. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the



## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

---

address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**EPA Review:** EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: [Oquendo.Ana@epa.gov](mailto:Oquendo.Ana@epa.gov). Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www2.epa.gov/caa-permitting/florida-proposed-title-v-permits>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at

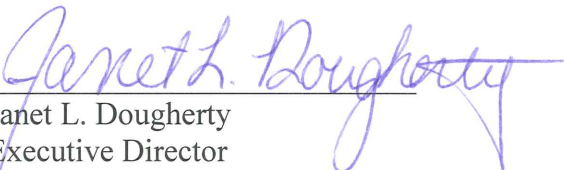
WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

---

<http://www2.epa.gov/caa-permitting/florida-proposed-title-v-permits>.

Executed in Tampa, Florida.

Environmental Protection Commission  
of Hillsborough County

  
\_\_\_\_\_  
Janet L. Dougherty  
Executive Director

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

---

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue a Revised Title V Air Operation Permit (including the Public Notice, the Statement of Basis, and the Draft/Proposed Permit), or a link to these documents available electronically on a publicly accessible server, was sent by certified mail or electronically before the close of business on \_\_\_\_\_ to the persons listed below.

Mr. Robert Myers ([rcmyers@ball.com](mailto:rcmyers@ball.com))

Ms. Elizabeth Broadway, P.E. ([ebroadway@broadway-eng.com](mailto:ebroadway@broadway-eng.com))

Ms. Barbara Friday, DEP BAR: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)



(Date)



## **PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS**

---

Environmental Protection Commission of Hillsborough County  
Draft/Proposed Title V Air Operation Permit No. 0570160-016-AV  
Ball Metal Beverage Container Corp.  
Hillsborough County, Florida

**Applicant:** The applicant for this project is Ball Metal Beverage Container Corp. The applicant's responsible official and mailing address are: Robert Myers, Plant Manager, 4700 Whiteway Dr., Tampa, FL 33617.

**Facility Location:** The applicant operates the existing facility, which is located in Hillsborough County at 4700 Whiteway Dr., Tampa, FL 33617.

**Project:** The applicant applied on December 16, 2015 to the Environmental Protection Commission for a Title V air operation permit renewal for the operation of a beverage container can manufacturing facility. This is a renewal of the Title V Air Operation Permit No. 0570160-015-AV. The existing operation consists of manufacturing aluminum cans using three can manufacturing lines and coating the cans with base coatings, internal coatings, and external coatings. VOC emissions from the operation are controlled by a regenerative thermal oxidizer.

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility.

The Environmental Protection Commission of Hillsborough County is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical/ mailing address is: 3629 Queen Palm Drive, Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permit by visiting the following website: <https://fldep.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the draft/proposed

(Public Notice to be Published in the Newspaper)



## **PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS**

---

Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Environmental Protection Commission of Hillsborough County's Legal Office, 3629 Queen Palm Drive, Tampa, FL 33619. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

---

106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

**EPA Review:** EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: [Oquendo.Ana@epa.gov](mailto:Oquendo.Ana@epa.gov). Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www2.epa.gov/caa-permitting/florida-proposed-title-v-permits>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www2.epa.gov/caa-permitting/florida-proposed-title-v-permits>.

# Ball Metal Beverage Container Corporation

Facility ID No. 0570160  
Hillsborough County

## **Title V Air Operation Permit Renewal**

Permit No. 0570160-016-AV  
Renewal of Title V Air Operation Permit No. 0570160-015-AV



### **Permitting and Compliance Authority:**

Environmental Protection Commission  
of Hillsborough County  
3629 Queen Palm Drive  
Tampa, Florida 33619

Telephone: (813) 627-2600  
Fax: (813) 627-2660

---

## STATEMENT OF BASIS

---

### Title V Air Operation Permit Renewal Permit No. 0570160-016-AV

#### **APPLICANT**

The applicant for this project is Ball Metal Beverage Container Corporation. The applicant's responsible official and mailing address are: Robert Myers, Plant Manager, 4700 Whiteway Dr., Tampa, FL 33617.

#### **FACILITY DESCRIPTION**

The applicant operates the existing facility, which is located in Hillsborough County at 4700 Whiteway Dr., Tampa, FL 33617.

Ball Metal Beverage Container Corporation is a beverage container can manufacturing facility which consists of three can lines – Can Lines Nos. 1, 2, and 3. The regulated emissions units include Internal Coating Line Nos. 1 and 2 (EU No. 001), Internal Coating Line No. 3 (EU No. 006), External Coating Line Nos. 1 and 2 (EU Nos. 002), External Coating Line No. 3 (EU No. 007), Base Coating Line No. 2 (EU No. 004), and Facility-wide Cleanup Solvents (EU 008).

The beverage container can manufacturing process begins by loading coiled aluminum onto one of three uncoilers using forklifts. Each uncoiler feeds the aluminum into a dedicated lubricator, which applies a thin film of lubricant. Next, dedicated cuppers cut out circular blanks of aluminum and form them into cups. In each can line, the cups are conveyed to bodymakers, which consist of a series of tooling dies that stretch and form the cups into cans and trimmers that cut the cans to a uniform height. Can Line Nos. 1 and 2 each have eight (8) bodymakers. Can Line No. 3 has ten (10) bodymakers.

The trimmed cans are next conveyed through a washer and associated natural gas fired dryers for drying. These dryers are vented to the atmosphere. The washers consist of alternating spraying of caustic (NaOH) or acid wash set-up (sulfuric, hydrochloric and/or hydrofluoric acids) and water. After cleaning and drying, the cans are ready for the application of the coatings. All of the dryers and ovens at the facility are fired with natural gas or propane as a back-up fuel. The dryers and ovens are not subject to any unit-specific applicable requirements and are considered to be insignificant sources pursuant to Rule 62-210.300(3)(b)1., F.A.C.

The clean, dry cans are then conveyed to printer stations called decorators for the application of basecoats, external coatings, internal coatings, and overvarnish, as needed. Basecoat is applied on Can Line No. 2 only, as needed. Can Lines Nos. 1 and 2 have one decorator each. Can Line No. 3 has two decorators. Up to eight different patterns of various colors may be applied by each decorator.

From the decorators, the cans pass through bottom coaters. Can Line Nos. 1 and 3 currently use ultra violet (UV) technology for bottom coating. The can bottoms are passed across a roller to have the coating applied and then are directed to a small box containing UV lamps. The radiant energy from the lamps cure the bottom coating. A UV station may be added to Can Line No. 2 at any time. After bottom coating, the cans are coated with overvarnish, as needed, and conveyed into the decorator ovens to cure. Each can line has one decorator drying oven, for a total of three ovens. These ovens are vented to the thermal oxidizer described below.



## STATEMENT OF BASIS

---

Next on each line, a thin coating of lacquer is applied to the inside of each can, referred to as internal coating. Particulate matter emissions from the internal coating on Can Line Nos. 1 and 2 are controlled by one 1,900 dscfm, Smith Environmental, Model No. SAJ-9, baghouse, which vents to the atmosphere. This baghouse is exempt from permitting pursuant to Rules 62-210.300(b)1. and 62-296.700(2)(a), F.A.C. because emissions are less than 5 lbs/year and 5 tons/year. Particulate matter emissions from the internal coating on Can Line No. 3 are controlled by a 1,900 dscfm, Donaldson Torit Products, Model No. DFT3-12, baghouse, which is vented to the thermal oxidizer.

After the internal coating is applied, the internal coating is cured in the internal coating bake ovens. Each can line has one internal coating bake oven. The cans are then machined further to narrow the can opening, remove any ridges, and roll back the top edges to form a lip to which the can end can be attached. Finally, each can is tested for holes or damage using a computerized scanning system and is palletized for storage and shipment. The can ends (tops of cans) are not manufactured or coated at this facility but are attached by the customer after the cans are filled with product.

VOC emissions from the can lines are controlled by a Durr, Model No. RL40-V3-95, Regenerative Thermal Oxidizer (RTO), which is required to meet a minimum destruction efficiency of 95% for VOC and HAPs emissions. In order to limit the potential emissions, Can Line Nos. 1 and 2 are required to meet 60% capture efficiency in addition to the 95% RTO destruction efficiency. The permittee has the option of demonstrating another capture/destruction combination which meets the same overall control efficiency of 57%.

Also, in order to limit the potential emissions, Can Line No. 3 is required to meet 80% capture efficiency in addition to the 95% RTO destruction efficiency. The permittee has the option of demonstrating another capture/destruction combination which meets the same overall control efficiency of 76%. In addition to the RTO, the facility-wide potential VOC emissions are controlled by limiting throughput and the VOC content of the coatings to limits which are below New Source Performance Standards (NSPS) allowable concentrations. The facility-wide potential VOC emissions are limited to 268 tons per year.

To allow for increased flexibility, four alternative modes of operation have been approved that allow for variations in product usages while maintaining emissions below the facility-wide limit. This is accomplished through emissions savings generated from reduced product usage or increased capture efficiencies. This also allows for some uncontrolled operation of Can Line Nos. 1, 2, and 3 during oxidizer repair and maintenance periods.

The facility also operates one 252 HP fire pump engine (John Deere, Model No. JW6H-UF38), one 30 kW emergency generator (Onan, Model No. 30OEK-15R/10227C), and one 85 kW emergency generator (Onan, Model No. 85.OKR-15R/22072V). The 252 HP, diesel fuel fired, fire pump was installed in 2010 and is subject to 40 CFR 60 Subpart IIII.

The two natural gas fired emergency generators are used for emergency power only and were installed prior to April 1, 2006. Therefore, these emergency engines are exempt from 40 CFR 60 Subpart IIII. In addition, these emergency engines are exempt from 40 CFR 63 Subpart ZZZZ pursuant to 40 CFR 63.6585 because they are existing commercial emergency generators (constructed prior to June 12, 2006) and the generators do not operate for emergency demand response purposes.

---

## STATEMENT OF BASIS

---

However, in order to remain exempt from 40 CFR 63 Subpart ZZZZ, the natural gas fired emergency generators are limited to operating for a maximum of 100 hours per calendar year for maintenance checks/readiness testing and operation for up to 50 hours per calendar year in non-emergency situations, pursuant to 40 CFR 63.6585. The 50 hours of operation in non-emergency situations are counted as part of the 100 total hours of operation per calendar year.

Per the FDEP guidance memo “Applicant Enforcement History” dated September 28, 2015, a nationwide enforcement search was performed for all programs using the EPCHC enforcement database and the EPA ECHO database. In June 2015, formal enforcement for two Clean Water Act Violations occurred at the Ball Metal Beverage Container Corporation located at 95 Ballard Road, Middletown, NY 10941, Source ID No. 110000323043. There has been no formal enforcement in any program in the last five years at the Ball Metal Beverage Container Corporation, Tampa facility.

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

### **PROJECT DESCRIPTION**

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

### **PROCESSING SCHEDULE AND RELATED DOCUMENTS**

Initial Title V Air Operation Permit No. 0570160-006-AV issued June 15, 2000

Title V Renewal Permit No. 0570160-012-AV issued August 23, 2006

Title V Renewal Permit No. 0570160-015-AV issued August 8, 2011

Application for a Title V Air Operation Permit Renewal received December 16, 2015

### **PRIMARY REGULATORY REQUIREMENTS**

Standard Industrial Classification (SIC) Code: 3411 – Fabricated Metal Products, Metal Cans

North American Industry Classification System (NAICS): 332431 – Metal Can Manufacturing

HAP: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60, specifically 40 CFR 60 Subpart WW and 40 CFR 60 Subpart IIII.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) applies to Can Line Nos. 1 – 3 (EU Nos. 001, 002, 004, 006, and 007) for VOC emissions. These emission units are subject to CAM because the potential

## STATEMENT OF BASIS

---

VOC emissions are greater than 100 tons/year and the facility is subject to an emission limiting standard specified in 40 CFR 60 Subpart WW, which was proposed prior to November 15, 1990. The facility-wide VOC emissions are controlled by a Durr, Model No. R40-V3-95, Regenerative Thermal Oxidizer.

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

### PROJECT REVIEW

Changes to the permit made as part of this renewal are shown in ~~strike-through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been highlighted in yellow within the permit document.

1. Section III. Subsection D and EU No. 009 (Fire Pump Engine) were added to the permit to reflect the requirements of 40 CFR 60 Subpart IIII.
2. Information on the exempted emergency engines was added to the process description to specify the applicability of 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart IIII.

Specific Condition Nos. C.12, C.14, and C.15 are updated as follows to reflect the requirements of Rule 62-297.310, F.A.C.

C.12. Test the regenerative thermal oxidizer for destruction efficiency annually, once per ~~federal fiscal year (October 1 through September 30)~~ calendar year (January 1 – December 31).

C.14. Testing of emissions shall be conducted with Can Line Nos. 1, 2, and 3 operating at capacity. Capacity is defined as 90-100% of ~~222,024 cans/hour for Can Line Nos. 1 and 2 and 154,002 cans/hour for Line 3 based on the September 21, 2010 compliance test~~ the number of cans processed by each Can Line during the most recent successful compliance test. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. [Rules 62-4.070(3) and 62-297.310(3)(b), F.A.C.]

C.15. ~~The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 30 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted.~~ At least 30 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPCHC, unless shorter notice is agreed to by the EPCHC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven

## STATEMENT OF BASIS

---

days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. [40 CFR 60.8(d) and Rules 62-297.310(9) and 62-4.070(3), F.A.C.]

3. Specific Condition No. C.20 is updated as follows to reflect the requirements of 40 CFR 60 Subpart WW.

C.20. Each destruction and capture efficiency test report shall include the following: [40 CFR 60.495, Rules 62-4.070(3) and 62-297.310(10)(c), F.A.C.]

- A) A diagram of each of the dampers in the capture system, along with their positions maintained during the capture and destruction efficiency test(s). Once the capture and destruction efficiency testing is completed, the dampers shall be maintained in the same positions as during the test(s). However, the dampers for the regenerative thermal oxidizer may be test cycled on a monthly basis for safety purposes to prevent build up and sticking.
- B) The combustion temperature during the test.
- C) The total mass of VOC per volume of coating solids before and after the incinerator.
- D) The capture efficiency and the destruction efficiency of the incinerator used to attain compliance with the applicable emission limit specified under 40 CFR 60.492 (Specific Condition Nos. A.6. and B.6.
- E) A description of the method used to establish the amount of VOCs captured by the capture system and sent to the control device.

## CONCLUSION

This project renews the Title V air operation permit No. 0570160-015-AV, which was effective on August 8, 2011. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.



Title V Air Operation Permit Renewal

Permit No. 0570160-016-AV

Table of Contents

Section	Page Number
Placard Page .....	1
I. Facility Information.	
A. Facility Description. ....	2
B. Summary of Emissions Units. ....	4
C. Applicable Regulations. ....	4
II. Facility-wide Conditions. ....	5
III. Emissions Units and Conditions.	
A. EU 001, 002, 004 – Coatings for Can Line Nos. 1 and 2 .....	8
B. EU 006 and 007 – Coatings for Can Line No. 3 .....	11
C. EU 001, 002, 004, 006, 007, 008 – Can Line Nos. 1, 2, and 3 and Clean-Up Solvents .....	14
D. EU 009 – Fire Pump Engine .....	25
IV. Appendices. ....	29
Appendix A, Glossary.	
Appendix I, List of Insignificant Emissions Units and/or Activities.	
Appendix RR, Facility-wide Reporting Requirements.	
Appendix TR, Facility-wide Testing Requirements.	
Appendix TV, Title V General Conditions.	
Appendix CAM, Compliance Assurance Monitoring Plan.	
Appendix NSPS, Subpart A – General Provisions.	
Appendix NSPS, Subpart WW - Standards of Performance for the Beverage Can Surface Coating Industry	
Appendix NSPS, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	
Referenced Attachments.	
Figure 1, Summary Report - Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).	
Table H, Permit History.	
Table 1, Summary of Air Pollutant Standards and Terms.	
Table 2, Compliance Requirements.	

**COMMISSION**

Kevin Beckner      Lesley "Les" Miller, Jr.  
Victor D. Crist      Sandra L. Murman  
Ken Hagan          Stacy White  
Al Higginbotham



**EXECUTIVE DIRECTOR**  
Janet L. Dougherty

**DIVISION DIRECTORS**

Legal & Admin.	Richard Tschantz, Esq.
Air Management	Jerry Campbell, P.E.
Waste Management	Hooshang Boostani, P.E.
Water Management	Sam Elrabi, P.E.
Wetlands Management	Kelly Bishop, P.G.

**PERMITTEE:**

Ball Metal Beverage Container Corporation  
4700 Whiteway Drive  
Tampa, Florida 33617

Permit No. 0570160-016-AV  
Facility ID No. 0570160  
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing facility is located in Hillsborough County at 4700 Whiteway Drive, Tampa, Florida 33617. UTM Coordinates are: Zone 17, 361.8 East, 3103.3 North. Latitude is: 28-2.53 North; and, Longitude is: 82-24.21 West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: TBD  
Renewal Application Due Date: TBD  
Expiration Date: TBD

***(Draft/Proposed)***

---

Janet L. Dougherty  
Executive Director

JLD/LAW/law