

Mr. Steve Underhill
United States Can Company
U.S. Routes 12 & 49
Chesterton, IN 46304

Re: 127-11144
First Administrative Amendment to
Part 70 T127-7553-00012

Dear Mr. Underhill:

United States Can Company was issued a permit on May 27, 1999, for a metal can surface coating operation. A letter requesting a change to the person designated as the Responsible Official and correction of typographical errors in the facilities description of Section D.1 and volatile organic compound (VOC) content limit in Condition D.2.1 was received on July 12, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (bold emphasis added to new language):

1. United States Can Company has requested to have the Responsible Official designated in Section A.1 (General Information) on Page 5 of the permit changed from Jerry Nelson to Steve Underhill. The revised section shall be as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal can surface coating operation.

Responsible Official:	Jerry Nelson Steve Underhill
Source Address:	U.S. Routes 12 & 49, Chesterton, IN 46304
Mailing Address:	U.S. Routes 12 & 49, Chesterton, IN 46304
SIC Code:	3411
County Location:	Porter
County Status:	Nonattainment for ozone
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

2. As a result of comments made by United States Can Company during the public notice period of the Title V permit, the Btu capacity of the natural gas fired ovens associated with the lithographic printing lines in emission unit P001 was changed from 9.5 MMBtu/hr to 8.9 MMBtu/hr in the Addendum to the TSD. The description of the ovens was revised in Section A.2 of the final Title V permit, but the facilities description in Section D.1 on Page 29 of the permit was not revised. To make Section D.1 consistent with the corrected Section A of the permit, the facilities description shall be revised as follows:

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**United States Can Company
U.S. Routes 12 & 49
Chesterton, Indiana 46304**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T127-7553-00012	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: May 27, 1999
First Administrative Amendment: 127-11144	Pages Affected: 5, 29, and 32
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal can surface coating operation.

Responsible Official: Steve Underhill
Source Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Mailing Address: U.S. Routes 12 & 49, Chesterton, IN 46304
SIC Code: 3411
County Location: Porter
County Status: Nonattainment for ozone
Source Status: Part 70 Permit Program
Major Source, under Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Emission unit P001 consists of the following:
 - (a) One (1) rollcoater, one (1) lithography press and a direct fired natural gas line oven, identified as PC-1, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-1 and S-2.
 - (b) One (1) rollcoater, three (3) lithography presses and a direct fired natural gas line oven, identified as PC-2, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-3 and S-4.
 - (c) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-7, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-6 and S-7.
 - (d) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-8, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-8 and S-9.
 - (e) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-9, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-10 and S-11.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) Emission unit P001 consists of the following:
- (a) One (1) rollcoater, one (1) lithography press and a direct fired natural gas line oven, identified as PC-1, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-1 and S-2.
 - (b) One (1) rollcoater, three (3) lithography presses and a direct fired natural gas line oven, identified as PC-2, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-3 and S-4.
 - (c) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-7, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-6 and S-7.
 - (d) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-8, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-8 and S-9.
 - (e) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-9, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-10 and S-11.
 - (f) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-10, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 8.9 MMBtu/hr, respectively, and exhausting to stacks S-12 and S-13.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3(b), no owner or operator of a facility engaged in the surface coating of can may cause allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following delivered to the coating applicator:

Coating	326 IAC 8-2-3 Limit (lb VOC/gal), less water
Exterior Base Coat	2.8
Over Varnish	2.8

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(2) Emission unit P002 consists of the following:

- (a) One (1) rollcoater, identified as C-3, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.
- (b) One (1) rollcoater, identified as C-4, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.
- (c) One (1) rollcoater, identified as C-5, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.
- (d) One (1) rollcoater, identified as C-6, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

- (a) Pursuant to 326 IAC 8-2-3(b), no owner or operator of a facility engaged in the surface coating of can may cause allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following delivered to the coating applicator:

Coating	326 IAC 8-2-3 Limit (lb VOC/gal), less water
Exterior Base Coat	2.8
Over Varnish	2.8

- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-3(b), 2.8 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 45.2 pounds per gallon of coating solids delivered to the applicator.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Facility Description [326 IAC 2-7-5(15)]:

- (1) Emission unit P001 consists of the following:
 - (a) One (1) rollcoater, one (1) lithography press and a direct fired natural gas line oven, identified as PC-1, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-1 and S-2.
 - (b) One (1) rollcoater, three (3) lithography presses and a direct fired natural gas line oven, identified as PC-2, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-3 and S-4.
 - (c) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-7, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-6 and S-7.
 - (d) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-8, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-8 and S-9.
 - (e) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-9, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-10 and S-11.
 - (f) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-10, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-12 and S-13.
3. The rollcoaters which are part of emission unit P002, covered in Section D.2 of the permit, are subject to the requirements of 326 IAC 8-2-3 (Surface coating emission limitations: can coating operations). Condition D.2.1 (Volatile Organic Compounds) on Page 32 of the permit contains an incorrect limit based on the rule; the applicable limit should be 2.8 pounds of VOC per gallon of coating less water rather than 3.5 pounds of VOC per gallon of coating less water. Review of the draft Title V permit indicates that correct limiting language was originally in Item (b) of Condition D.2.1 and was inadvertently changed from the draft to the final permit. The coating content limit shall be corrected in Item (b) of Condition D.2.1 to ensure compliance with 326 IAC 8-2-3, and the minimum control efficiencies required to demonstrate compliance based on 326 IAC 8-1-2(c) shall be revised as appropriate. The condition shall be amended as follows:
 - D.2.1(b) When operating the thermal oxidizer to achieve the limit for 326

IAC 8-2-3(b), ~~3.5~~ **2.8** pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum ~~85% overall control~~ **95% capture efficiency and 95% destruction efficiency**. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of ~~85%~~ **90%**, the VOC content of the coating shall not exceed ~~30.13~~ **45.2** pounds per gallon of coating solids delivered to the applicator.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janusz Johnson, at (800) 451-6027, press 0 and ask for extension (2-8325), or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

JKJ

cc: File - Porter County
U.S. EPA, Region V
Porter County Health Department
Northwest Regional Office
Air Compliance Section Inspector -Dave Sampias
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner