Mr. Ben Bacon
Silgan Containers Corporation
21800 Oxnard Street, Suite 600
Woodland Hills, California 91367

Re: 177-11458-00001
First Significant Permit Modification to
Part 70 No.: T177-7533-00001

Dear Mr. Bacon:

Silgan Containers Corporation, located at 1701 Williamsburg Pike, Richmond, Indiana was issued a Part 70 permit on March 17, 1999 for a stationary fabricated metal products manufacturing plant. A letter requesting changes to this permit was received on October 15, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the overall control efficiency of each of the four (4) coating lines catalytic oxidizers from 90% to the overall efficiency of 85% determined through compliance tests. The modification also includes a change in the volatile organic compounds (VOC) PTE before control due to the changes in the catalytic oxidizers overall efficiency.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification 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 Aida De Guzman, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD
cc: File - Wayne County
U.S. EPA, Region V
Wayne County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Silgan Containers Corporation
1701 Williamsburg Pike
Richmond, Indiana 47375

(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 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.: T177-7533-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: March 17, 1999
1st Significant Permit Modification: 177-11458-00001	
Issued by: Paul Dubenetzky, Chief Permit Branch	Issuance Date: Affected Pages: 29, 30, 31, 37

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(1) One (1) coating line, identified as Coat-1, with a maximum capacity of 9000 aluminum metal sheets per hour, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 MMBtu/hr, and exhausting to stack S5.

(2) One (1) coating line, identified as Coat-2, with a maximum capacity of 9000 aluminum metal sheets per hour, consisting of a lacquer coating machine, an offset lithographic press and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 MMBtu/hr, and exhausting to stack S8.

(3) One (1) coating line, identified as Coat-3, with a maximum capacity of 6000 aluminum metal sheets per hour, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 MMBtu/hr, and exhausting to stack S10.

(4) One (1) coating line, identified as Coat-4, with a maximum capacity of 6000 aluminum metal sheets per hour, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 MMBtu/hr, and exhausting to stack S12.

(5) One (1) plastisol closure gasket curing line, identified as plastisol, with a maximum capacity of 150,000 caps per hour, consisting of one natural gas-fired curing oven, with no controls, and exhausting to stack S20

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 8-6]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts may cause or allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to the plastisol curing line (item 5 above) coating applicator for forced warm air dried coatings.

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), no person shall emit or cause the emission of more than 100 tons per year of VOC from any source which commences operations after October 7, 1974 and prior to January 1, 1980 (items 1-4 above) unless all VOC emitted from such source are reduced by at least 85% from emissions which would occur before the application of any control equipment or process.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the input of VOC to the coating lines and plastisol operation, including cleanup solvent before control (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited per twelve month period, rolled on a monthly basis. The limits are as follows:

Facility	Input VOC Limit , before Controls (tons/year)	Emission Limit, after Controls, (tons/year)
Insignificant Activities	1.08	1.08
Boilers and Coating Lines 1 & 2 Catalytic Oxidizers	0.72	0.72
Plastisol	8.4	8.4
Coating Lines 1,2,3 & 4	1592	238.8
Total	1602	249

This input VOC limit before control in conjunction with the operation of the catalytic oxidizers at an overall efficiency of 85% will limit the potential to emit of VOC after control to less than 250 tons per 12 month period. Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations), the PM from the four (4) coating lines and the plastisol curing line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 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 any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform overall VOC control efficiency testing of the catalytic oxidizers according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.6 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The catalytic oxidizer and the fan moving the exhaust fumes from the coating operation to the catalytic oxidizer shall be in operation at all times whenever the coating line it controls is in operation.

(c) When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 600EF or a temperature determined in the compliance tests to maintain no less than 85% overall control efficiency.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of daily catalytic oxidizer temperatures and those additional inspections prescribed by the Preventive Maintenance Plan.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Silgan Containers Corporation
Source Address: 1701 Williamsburg Pike, Richmond, IN 47375
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375
Part 70 Permit No.: 177-7533-00001
Facility Parameter: Sourcewide
VOC
Limit:

Limits (tons/12-month period, rolled on a monthly basis)		
Facility	Input VOC Limit , before Controls (tons/year)	Emission Limit, after Controls, (tons/year)
Insignificant Activities	1.08	1.08
Boilers and Coating Lines 1 & 2 Catalytic Oxidizers	0.72	0.72
Plastisol	8.4	8.4
Coating Lines 1,2,3 & 4	1592	238.8
Total	1602	249

YEAR: _____

	Month 1			Month 2			Month 3		
Facility	This Month, Input VOC Usage Before Controls	Previous 11 Months Input VOC Usage Before Controls	12 Month Total Input VOC Usage Before Controls	This Month, Input VOC Usage Before Controls	Previous 11 Months Input VOC Usage Before Controls	12 Month Total Input VOC Usage Before Controls	This Month, Input VOC Usage Before Controls	Previous 11 Months Input VOC Usage Before Controls	12 Month Total Input VOC Usage Before Controls
Coating Lines 1,2,3 & 4									
Plastisol									

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Silgan Containers Corporation
Source Location:	1701 Williamsburg Pike, Richmond, Indiana 47375
County:	Wayne
SIC Code:	3469, 3559
Operation Permit No.:	T177-7533-00001
Operation Permit Issuance Date:	March 17, 1999
Permit Modification No.:	177-11458-00001
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a significant permit modification application from Silgan Containers Corporation relating to the request to relax the overall control efficiency of the permitted catalytic oxidizers using the efficiency determined in the recent compliance tests. The source is a stationary fabricated metal products manufacturing plant.

History

On October 15, 1999, Silgan Containers Corporation submitted an application to the OAM a permit modification to the Part 70 permit (T177-7533-00001), issued on March 17, 1999.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 15, 1999.

Emission Calculations

No new emissions will result from this Significant Permit Modification.

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	This modification does not result in any new PTE.
PM-10	
SO_2	
VOC	
CO	
NO_x	

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for Modification

The Part 70 permit is being modified through a Significant Permit Modification. Silgan Containers Corporation requests to relax the operation condition for the overall control efficiency of the catalytic oxidizers from 90% to the 85% overall efficiency determined in the recent compliance tests. This also includes the relaxation of the permitted VOC input usage before control. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1), which states that "....every relaxation of reporting, or record keeping permit terms or conditions shall be considered significant".

The source's requests for a modification to the issued Part 70 permit is as follows.

Request 1: Operation condition D.1.1(b) on page 29 of 38, which requires the catalytic oxidizers to operate at an overall control efficiency of 90% to control the VOC emissions from the plastisol shall be deleted, because this facility is not vented to a VOC control system.

Response 1: This requirement is deleted in the permit, because the plastisol is not vented to any VOC control system, and the coatings used are already in compliance with the limit of 3.5 pounds of VOC per gallon of coating less water under 326 IAC 8-2-9 (miscellaneous Metal Coating). Deletion is as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 8-6]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts may cause or allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to the plastisol curing line (item 5 above) coating applicator for forced warm air dried coatings.

~~(b) When operating the catalytic oxidizer to achieve the limit for 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the catalytic oxidizer shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the catalytic 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 66.7 pounds per gallon of coating solids delivered to the applicator.~~

(~~a~~ **b**) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(**c** ~~d~~) Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), no person shall emit or cause the emission of more than 100 tons per year of VOC from any source which commences operations after October 7, 1974 and prior to January 1, 1980 (items 1-4 above) unless all VOC emitted from such source are reduced by at least 85% from emissions which would occur before the application of any control equipment or process.

Request 2: In operation condition D.1.2 PSD Minor Limit page 30 of 38 of the issued Part 70 permit, please change the VOC input usage before control from the fixed monthly limit of 199.85 tons/month to 1602 tons per 12-month period, rolled on a monthly basis. This new limit is based on the catalytic oxidizers overall efficiency of 85%.

Response 2: Operation condition D.1.2 PSD Minor Limit page 30 of 38 of the issued Part 70 permit is revised as follows:

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the input of VOC to the coating lines and plastisol operation, including ~~and the usage of~~ cleanup solvent **before control** ~~for the coating lines and plastisol operation~~ (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) **shall be limited per twelve month period, rolled on a monthly basis. The limits are as follows**: ~~This input VOC limit is required to limit the potential to emit of VOC to less than 250 tons per 12 month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation is based upon the used of catalytic oxidizers with an overall control efficiency of 90%. Following are the monthly limits:~~

Facility	Input VOC Limit , before Controls (tons/**year**)	~~Monthly~~ Emission Limit, after Controls, (tons/**year**)
Insignificant Activities	~~.09~~ **1.08**	~~**.09**~~ **1.08**
Boilers and Coating Lines 1 & 2 Catalytic Oxidizers	~~0.06~~ **0.72**	~~**0.06**~~ **0.72**
Plastisol	~~0.7~~ **8.4**	~~**0.7**~~ **8.4**
Coating Lines 1,2,3 & 4	~~199~~ **1592**	~~19.9~~ **238.8**
Total	**1602**	~~20.75~~ **249**

This input VOC limit before control ~~is required to~~ **in conjunction with the operation of the catalytic oxidizers at an overall efficiency of 85% will limit the potential to emit of VOC after control to less than 250 tons per 12 month period. Compliance with this** ~~limit~~ **condition will make**~~s~~ **326 IAC 2-2 (Prevention of Significant Deterioration) not applicable**. ~~This limitation is based upon the used of catalytic oxidizers with an overall control efficiency of 90. Following are the monthly limits~~:

Request 3: Operation condition D.1.6(b) states that " The catalytic oxidizer and the fan moving the exhaust fumes from the coating operations to the catalytic oxidizer shall be in operation at all times that one or more of the coating lines is operated." This wording implies that even if we have only one coating line operating , we have to have all four oxidizers on line. At our Richmond plant, each line has its own oxidizer, and that the oxidizer operates when that line is running.

Operation condition D.1.6(c), on Page 31 of 38 of the part 70 permit, should be revised to incorporate the new overall control efficiency of 85%.

Response 3: Operation condition D.1.6(b), on Page 31 of 38 of the part 70 permit is revised as follows:

D.1.6 Volatile Organic Compounds (VOC)

(b) The catalytic oxidizer and the fan moving the exhaust fumes from the coating operation~~s~~ to the catalytic oxidizer shall be in operation at all times ~~that one or more of the coating lines is operated~~ **whenever the coating line it controls is in operation**.

Operation condition D.1.6(c), on Page 31 of 38 of the part 70 permit is revised as follows:

(c) When operating, the catalytic oxidizers shall maintain a minimum operating temperature of 600EF or a temperature determined in the compliance tests to maintain no less than ~~90~~ **85**% overall control efficiency.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1994 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	0
SO_2	0
VOC	150
CO	0
NO_x	0
HAP (specify)	*

*The OAM has no records of HAPs data as being submitted by the source. The Title V application from the source also contained no HAPs actual emissions.

County Attainment Status

The source is located in Wayne County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

The Significant Permit Modification, which involves the VOC input limit and the catalytic oxidizer overall efficiency relaxation will not change the federal rules already determined to be applicable to the source. See determination in the issued Part 70 permit.

State Rule Applicability -

The following rules are amended to reflect the new overall control efficiency (changes are bolded and deletion are struck-through for emphasis):

(a) 326 IAC 2-2 Prevention of Significant Deterioration
This source is not a major stationary source because emissions of volatile organic compounds are limited to less than 250 tons per ~~year~~ **twelve-month period, rolled on a monthly basis**, and it is not one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The source has chosen to comply with this limit by accepting a ~~monthly fixed rate~~ **rolling monthly limit**. Following are the ~~monthly~~ limits based on a ~~90%~~ **85%** overall control efficiency of the catalytic oxidizers.

Facility	Input VOC Limit , before Controls (tons/~~month~~ **year**)	~~Monthly~~ Emission Limit, after Controls, (tons**/year**)
Insignificant Activities	~~.09~~ **1.08**	~~.09~~ **1.08**
Boilers and Coating Lines 1 & 2 Catalytic Oxidizers	~~0.06~~ **0.72**	~~0.06~~ **0.72**
Plastisol	~~0.7~~ **8.4**	~~0.7~~ **8.4**
Coating Lines 1,2,3 & 4	~~199~~ **1592**	~~19.9~~ **238.8**
Total	**1602**	~~20.75~~ **249**

(b) 326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

(c) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(1) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(2) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

(d) 326 IAC 8-6 (Organic Solvent Emission Limitations)
Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state, with potential emissions of 100 tons or greater per year of VOCs, not limited by other rules in Article 8 shall comply with the following:

(1) No person shall emit or cause the emission of more than 100 tons per year of VOC from any source unless all VOC emitted from such source are reduced by at least 85% from emissions which would occur before the application of any control equipment or process.

(2) These emissions are only those emissions of organic solvents which are VOCs and which are liquids at standard conditions, and include diluents which are used as dissolvers, viscosity reducers, carrying agents and cleaning agents.

This source commenced operations during the aforementioned time frame and have installed catalytic oxidizers, rated at ~~90%~~ **85%** overall control efficiency, **meeting the required reduction efficiency in this rule** to control emissions from their coating lines. Therefore, they are in compliance with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section

D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The source has applicable monitoring conditions as specified below:

   (a) Record keeping of information sufficient to show that the source VOC emissions do not exceed ~~20.75~~ **249** tons per ~~month~~ twelve-month period, **rolled on a monthly basis.**

   These monitoring conditions are necessary to show the non-applicability of 326 IAC 2-2.

2. The Catalytic Oxidizers have applicable monitoring conditions as specified below:

   (a) The catalytic oxidizers and air collection system shall operate at all times that Coating Line 1,2, 3 and 4 are operated. When operating, the catalytic oxidizers shall maintain a minimum operating temperature of 600 EF or a temperature determined in the compliance tests to maintain a minimum ~~90%~~ **85%** overall destruction efficiency for each of the coating line applications. The input VOC limits were based on an overall ~~90%~~ **85%** control efficiency, as documented in the Title V application.

   These monitoring conditions are necessary to show compliance with 326 IAC 2-2 and 326 IAC 8-6.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) Since this source has no new construction or reconstruction, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply.

Conclusion

The relaxation of the catalytic oxidizers' overall control efficiency shall be subject to the conditions of the attached proposed **Significant Permit Modification 177-11458-00001.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Significant Permit Modification to Part 70 Operating Permit

Source Name:	Silgan Containers Corporation
Source Location:	1701 Williamburg Pike, Richmond, Indiana
County:	Wayne
SIC Code:	3469, 3559
Operation Permit No.:	T177-7533-00001
Operation Permit Issuance Date:	March 17, 1999
Significant Permit Modification No.:	177-11458-00001
Permit Reviewer:	Aida De Guzman

On November 3, 1999, the Office of Air Management (OAM) had a notice published in the Palladium Item, Richmond, Indiana, stating that Silgan Containers Corporation had applied for a Part 70 Operating Permit to operate a stationary fabricated metal products manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (changes are bolded and deletion are struck-through for emphasis).

Condition D.1.5 Testing Requirements has been revised to perform an overall VOC control efficiency testing, instead of performing the testing at the inlet and outlet of the catalytic oxidizers Condition D.1.5 is revised as follows:

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform ~~inlet and outlet~~ **overall** VOC **control efficiency** testing of the catalytic oxidizers according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.