



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: May 1, 2014

From: Matthew Stuckey, Chief
Permits Branch
Office of Air Quality

Source Name: Rexam Beverage Can Company

Permit Level: Transition from Title V to a Minor Source Operating Permit (MSOP)

Permit Number: 127-33668-00030

Source Location: 4001 Montdale Park Drive, Valparaiso, Indiana

Type of Action Taken: Modification at an existing source

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 33668.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Commissioner

Minor Source Operating Permit OFFICE OF AIR QUALITY

**Rexam Beverage Can Company
4001 Montdale Park Drive
Valparaiso, Indiana 46383**

(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 to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

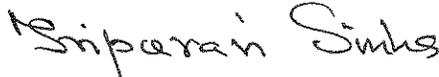
Operation Permit No.: M127-33668-00030	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: May 1, 2014 Expiration Date: May 1, 2019

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary stationary can end manufacturing plant.

Source Address:	4001 Montdale Park Drive, Valparaiso, IN 46383
General Source Phone Number:	219-462-4843
SIC Code:	3411
County Location:	Porter
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) can end manufacturing line, constructed in 1989, identified as Module #1, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and four (4) conversion presses, with a maximum capacity of 520,000 ends per hour, with no controls, exhausting to the atmosphere.
- (b) One (1) can end manufacturing line, constructed in 1989, identified as Module #2, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (c) One (1) can end manufacturing line, constructed in 1989, identified as Module #3, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (d) One (1) can end manufacturing line, constructed in 1989, identified as Module #4, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (e) One (1) can end manufacturing line, constructed in 2000, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner, tab lube

application, and one (1) six out shell press, with a maximum capacity of 150,000 ends per hour, with no controls, and exhausting to the atmosphere.

- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment. [326 IAC 6-3-2]
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour: one (1) air make-up unit rated at 1,878,000 Btu/hr.
- (i) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour.
- (j) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (k) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.
- (l) Particulate emissions from recycled trim material recovery.
- (m) Storage tanks containing tab lube (a lubricating oil).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M127-33668-00030, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M127-33668-00030 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management

Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than

twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) can end manufacturing line, constructed in 1989, identified as Module #1, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and four (4) conversion presses, with a maximum capacity of 520,000 ends per hour, with no controls, exhausting to the atmosphere.
- (b) One (1) can end manufacturing line, constructed in 1989, identified as Module #2, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (c) One (1) can end manufacturing line, constructed in 1989, identified as Module #3, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (d) One (1) can end manufacturing line, constructed in 1989, identified as Module #4, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (e) One (1) can end manufacturing line, constructed in 2000, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner, tab lube application, and one (1) six out shell press, with a maximum capacity of 150,000 ends per hour, with no controls, and exhausting to the atmosphere.

Note: The end sealing compound operation from all modules applies a precise bead of compound sealant in the curl of the can end.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 8-2-3(b)(4) (Can Coating Operations), the emissions from the beverage can coating operations shall not discharge volatile organic compounds in excess of the following:

Coating	lbs VOC per gallon excluding water
End Seal Coating	3.7

D.1.2 Preventive Maintenance Plan

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.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 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, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1

Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month; and
 - (4) The total VOC usage for each month.
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations), the allowable particulate emission rate from the brazing equipment, cutting torches, soldering equipment and welding equipment shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Rexam Beverage Can Company
Address:	4001 Montdale Park Drive
City:	Valparaiso, Indiana 46383
Phone #:	219-462-4843
MSOP #:	M127-33668-00030

I hereby certify that Rexam Beverage Can Company still in operation.
is :

no longer in operation.

I hereby certify that Rexam Beverage Can Company in compliance with the requirements of
is : MSOP M127-33668-00030.

not in compliance with the requirements
MSOP M127-33668-00030.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Title V Permit Transitioning to a
Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name: Rexam Beverage Can Company
Source Location: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
County: Porter
SIC Code: 3411
Operation Permit No.: M127-33668-00030
Permit Reviewer: Daniel W Pell

On September 18, 2013, the Office of Air Quality (OAQ) received an application from Rexam Beverage Can Company related to the transition of a Title V Permit to a MSOP.

Existing Approvals

The source has been operating under a Title V Operating Permit No. T127-32478-00030, issued on July 26, 2013. Due to this application, the source is transitioning from a Title V Permit to a MSOP.

County Attainment Status

The source is located in Porter County.

Pollutant	Designation
SO ₂	Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	40 CFR 81.315 as amended by 77 FR 34228. ^{1,2}
PM _{2.5}	Attainment effective February 6, 2012, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
P _b	Unclassifiable or attainment effective December 31, 2011.
¹ Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005.	
² The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.	

(a) **Ozone Standards**

U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Porter County as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x

emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

- (b) **PM_{2.5}**
Porter County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Porter County has been classified as attainment or unclassifiable in Indiana for the other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Rexam Beverage Can Company on September 17, 2013, relating to the source transitioning to a MSOP from a Title V Operating Permit.

The source consists of the following permitted emission units:

- (a) One (1) can end manufacturing line, constructed in 1989, identified as Module #1, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and four (4) conversion presses, with a maximum capacity of 520,000 ends per hour, with no controls, exhausting to the atmosphere.
- (b) One (1) can end manufacturing line, constructed in 1989, identified as Module #2, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (c) One (1) can end manufacturing line, constructed in 1989, identified as Module #3, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.
- (d) One (1) can end manufacturing line, constructed in 1989, identified as Module #4, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 470,000 ends per hour, with no controls, exhausting to the atmosphere.

- (e) One (1) can end manufacturing line, constructed in 2000, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner, tab lube application, and one (1) six out shell press, with a maximum capacity of 150,000 ends per hour, with no controls, and exhausting to the atmosphere.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment. [326 IAC 6-3-2]
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour: one (1) air make-up unit rated at 1,878,000 Btu/hr.
- (i) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour.
- (j) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (k) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.
- (l) Particulate emissions from recycled trim material recovery.
- (m) Storage tanks containing tab lube (a lubricating oil).

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP
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The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	12.04
PM10 ⁽¹⁾	12.23
PM2.5	12.23
SO ₂	0.01
NO _x	4.54
VOC	93.4
CO	2.83
GHGs as CO ₂ e	4,642

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Hexane	0.02
Manganese	0.22
TOTAL HAPs	0.23

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of the criteria pollutants are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Modules #1 - #4	8.86	8.86	8.86	0.0	0.0	85.9	0.0	0.0	0.0	0.0
Module #5	0.69	0.69	0.69	0.0	0.0	6.68	0.0	0.0	0.0	0.0
Facility-wide clean-up solvent	0.0	0.0	0.0	0.0	0.0	0.51	0.0	0.0	0.0	0.0
NG Make-Up Air Unit	0.02	0.06	0.06	0.005	0.81	0.04	0.68	973	0.02	0.015 Hexane
LP and Propane Gas Combustion	0.06	0.20	0.20	0.01	3.73	0.29	2.15	3669	0.0	0.0
Welding Process	2.41	2.41	2.41	0.0	0.0	0.0	0.0	0.0	0.22	0.22 Manganese
Thermal Cutting Process	0.01	0.01	0.01	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total PTE of Entire Source	12.04	12.23	12.23	0.01	4.54	93.4	2.83	4642	0.23	0.22 Manganese
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) **326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) **326 IAC 2-2 (Prevention of Significant Deterioration(PSD))**
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all PSD regulated pollutants are less than 250 tons per year and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). The potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, pursuant to 326 IAC 2-2, it is not a major source for PSD.
- (c) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) **326 IAC 2-6 (Emission Reporting)**
Since this source is located in Porter County, and has actual emissions of NO_x and VOC greater than or equal to twenty-five (25) tons per year, an emission statement covering the previous calendar year must be submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (e) **326 IAC 5-1 (Opacity Limitations)**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) **326 IAC 6-4 (Fugitive Dust Emissions Limitations)**
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-2(e), the allowable PM emission rate for the flame cutting shall be five hundred fifty-one thousandths (0.551) pound per hour because the process weight rate is less than one hundred (100) pounds per hour.

The recycled trim material recovery process has PM emissions that are less than 0.551 lbs/hr and is therefore exempt from the requirements of 326 IAC 6-3-2.

The can end manufacturing lines, identified as Modules #1 through #5, have PM emissions less than 0.551 lbs/hr and are therefore exempt from the requirements of 326 IAC 6-3-2.

(h) **326 IAC 8-2-3 (Can Coating Operations)**

Pursuant to 326 IAC 8-2-3(b)(4), the can end manufacturing lines, identified as Modules #1 through #5, shall not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.7 pounds per gallon excluding water. The source will comply with this limitation through the use of a compliant coating.

The source uses a water based compound (Darex 4208-66) for end seal coating operations. The pounds of VOC per gallon of coating less water, delivered to the applicator for the end seal coating is zero, which is less than the 326 IAC 8-2-3(b)(4) limit. Therefore, the source shall be in compliance whenever the water based coating (Darex 4208-66) is used for end seal coating operations. 326 IAC 8-2-3 does not apply to the lubricant used when the tab is fixed to the can, identified as AMCO 4880 (tab lube), because it is not an end seal compound.

(i) **326 IAC 12 (New Source Performance Standards)**

See Federal Rule Applicability Section of this TSD.

(j) **326 IAC 20 (Hazardous Air Pollutants)**

See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

No compliance monitoring requirements are included in this permit.

Description Changes from List of Permitted Emission Units

The following description language that was shown as an insignificant activity in Section A.4 (e) of the Title V Operating Permit was deleted during this transition to a MSOP. The description language was deleted because the insignificant activity that was being referred to was a non-stationary, LP gas-powered Lift Truck with a reciprocating internal combustion engine that lifts heavy coils of metal only during periods of power outages. The PTE from this Lift Truck is not calculated.

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (e) ~~Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;~~

Conclusion and Recommendation

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 September 17, 2013.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M127-33668-00030. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Daniel W Pell at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8532 or toll free at 1-800-451-6027 extension 4-8532.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Calculations
PTE of Entire Source**

Company: Rexam Beverage Can Company
Address City IN Zip: 4001 Montdale Park Drive, Valparaiso
Permit: M127-33668-00030
Reviewer: Daniel W Pell

Uncontrolled PTE (tons/yr)

Pollutant	PM	PM₁₀	PM_{2.5}	SO₂	VOC	CO	NO_x	GHG's (CO₂e)	Total HAP's	Worst Case Single HAP
Modules #1 - #4	8.86	8.86	8.86	0.0	85.9	0.0	0.0	0.0	0.0	0.0
Modules #5	0.69	0.69	0.69	0.0	6.68	0.0	0.0	0.0	0.0	0.0
Facility-wide clean-up solvent	0.0	0.0	0.0	0.0	0.51	0.0	0.0	0.0	0.0	0.0
NG Make-Up Air Unit	0.02	0.06	0.06	0.005	0.04	0.68	0.81	973	0.02	0.015 Hexane
LP and Propane Gas Combustion	0.06	0.20	0.20	0.01	0.29	2.15	3.73	3669	0.0	0.0
Welding Process	2.41	2.41	2.41	0.0	0.0	0.0	0.0	0.0	0.22	0.22 Manganese
Thermal Cutting Process	0.00	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TOTALS	12.04	12.23	12.23	0.01	93.4	2.83	4.54	4642	0.23	0.22 Manganese

Appendix A: Emission Calculations

Company: Rexam Beverage Can Company
 Address City IN Zip: 4001 Montdale Park Drive, Valparaiso
 Permit: M127-33668-00030
 Reviewer: Daniel W Pell

Tab Lube Operations
 Particulate & VOC Emissions

										Potential Emissions				
										VOC Content		PM & PM _{102.5}	VOC	
Material	Density (lb/gal)	H2O + Organics (wt %)	Water (wt %)	Organics (wt %)	Water (vol %)	Solids (vol %)	Mat. Use (gal/unit)	Max. (unit/hr)	Coating, less water (lb/gal)	(lb/gal)	(ton/yr)	(lb/hr)	(ton/yr)	
MODULE 1														
Can End Seal Compound - Water Based Material														
Darex 4208-66 Mod. 1	10.3	34.00%	34.0%	0.0%	41.8%	58.00%	7.6E-06	520,000	0.00	0.00	2.36	0.00	0.00	
Tab Lube Lubricant (Tab is Part of the Can end)														
ANCHOR 3810	6.34	94.30%	0.0%	94.3%	0.0%	5.70%	1.7E-06	520,000	5.98	5.98	0.03	5.28	23.15	
TOTAL for MODULE 1											2.39		23.15	

Material	Density (lb/gal)	H2O + Organics (wt %)	Water (wt %)	Organics (wt %)	Water (vol %)	Solids (vol %)	Mat. Use (gal/unit)	Max. (unit/hr)	Coating, less water (lb/gal)	(lb/gal)	(ton/yr)	(lb/hr)	(ton/yr)
MODULE 2													
Can End Seal Compound - Water Based Material													
Darex 4208-66 Mod. 2	10.3	34.00%	34.0%	0.0%	41.8%	58.00%	7.6E-06	470,000	0.00	0.00	2.13	0.00	0.00
Tab Lube Lubricant (Tab is Part of the Can end)													
ANCHOR 3810	6.34	94.30%	0.0%	94.3%	0.0%	5.70%	1.7E-06	470,000	5.98	5.98	0.03	4.78	20.92
TOTAL for MODULE 2											2.16		20.92

Material	Density (lb/gal)	H2O + Organics (wt %)	Water (wt %)	Organics (wt %)	Water (vol %)	Solids (vol %)	Mat. Use (gal/unit)	Max. (unit/hr)	Coating, less water (lb/gal)	(lb/gal)	(ton/yr)	(lb/hr)	(ton/yr)
MODULE 3													
Can End Seal Compound - Water Based Material													
Darex 4208-66 Mod. 3	10.3	34.00%	34.0%	0.0%	41.8%	58.00%	7.6E-06	470,000	0.00	0.00	2.13	0.00	0.00
Tab Lube Lubricant (Tab is Part of the Can end)													
ANCHOR 3810	6.34	94.30%	0.0%	94.3%	0.0%	5.70%	1.7E-06	470,000	5.98	5.98	0.03	4.78	20.92
TOTAL for MODULE 3											2.16		20.92

Material	Density (lb/gal)	H2O + Organics (wt %)	Water (wt %)	Organics (wt %)	Water (vol %)	Solids (vol %)	Mat. Use (gal/unit)	Max. (unit/hr)	Coating, less water (lb/gal)	(lb/gal)	(ton/yr)	(lb/hr)	(ton/yr)
MODULE 4													
Can End Seal Compound - Water Based Material													
Darex 4208-66 Mod. 4	10.3	34.00%	34.0%	0.0%	41.8%	58.00%	7.6E-06	470,000	0.00	0.00	2.13	0.00	0.00
Tab Lube Lubricant (Tab is Part of the Can end)													
ANCHOR 3810	6.34	94.30%	0.0%	94.3%	0.0%	5.70%	1.7E-06	470,000	5.98	5.98	0.03	4.78	20.92
TOTAL for MODULE 4											2.16		20.92

Material	Density (lb/gal)	H2O + Organics (wt %)	Water (wt %)	Organics (wt %)	Water (vol %)	Solids (vol %)	Mat. Use (gal/unit)	Max. (unit/hr)	Coating, less water (lb/gal)	(lb/gal)	(ton/yr)	(lb/hr)	(ton/yr)
MODULE 5													
Can End Seal Compound - Water Based Material													
Darex 4208-66 Mod. 5	10.3	34.00%	34.0%	0.0%	41.8%	58.00%	7.6E-06	150,000	0.00	0.00	0.68	0.00	0.00
Tab Lube Lubricant (Tab is Part of the Can end)													
ANCHOR 3810	6.34	94.30%	0.0%	94.3%	0.0%	5.70%	1.7E-06	150,000	5.98	5.98	0.01	1.52	6.68
TOTAL for MODULE 5											0.69		6.68

TOTAL for MODULES 1 - 5													92.59
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FACILITY WIDE CLEAN UP SOLVENT													
Material	Density (lb/gal)	H2O + Organics (wt %)	Water (wt %)	Organics (wt %)	Water (vol %)	-	-	-	Gal. Used	VOC Pounds gallon of solvent	-	Potential VOC pounds per hour	Potential VOC tons per year
Safety Klean Prem. Solv.	6.80	100.00%	0.0%	100.0%	0.0%	-	-	-	150.0	6.8	-	0.1	0.51
TOTAL FACILITY WIDE CLEAN UP SOLVENT													0.51

TOTAL VOC: COMBINED FACILITY USAGE											9.55		93.1
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Note:
 Various tab lube formulations are employed. Highest VOC formulation (5.98 lb/gal) is used for calculation. Hazardous Air Pollutants (HAP's) content = 0.0 %
Methodology:
 VOC = (Density (lb/gal) * Weight % Organics)
 Potential PM/PM10/PM2.5 = (Density)(lb/gal) x (1-%H2O,organics) x (Usage)(gal/unit) x (max.)(units/hr) x (1-98%transfer eff.) x (8,760)(hr/yr) x (1/2,000)(ton/lb)
 Lube application via drip and felt pad (direct transfer) -- minimal airborne expression. Transfer efficiency = 98%.
 Potential VOC Tons per Year = VOC (lb/gal) * Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-98% Trans. Eff.) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
One (1) NG Make-Up Air Unit at 1.878 MMBtu/hr
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Rexam Beverage Can Company
Address City IN Zip: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Permit Number: M127-33668-00030
Reviewer: Daniel W Pell

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.878	1020	16.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.06	0.06	0.00	0.81	0.04	0.68

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.694E-05	9.677E-06	6.048E-04	1.452E-02	2.742E-05	1.517E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.032E-06	8.871E-06	1.129E-05	3.064E-06	1.694E-05	4.419E-05
						Total HAPs 1.522E-02
						Worst HAP 1.452E-02

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	968	0.0	0.0
Summed Potential Emissions in tons/yr	968		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	973		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	974		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential
 CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential

**Appendix A: Emission Calculations
LPG-Propane Gas Combustion**

Company Name: Rexam Beverage Can Company
Address City IN Zip: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Permit Number: M127-33668-00030
Reviewer: Daniel W Pell

Heat Input Capacity MMBtu/hr 6.00 Potential Throughput kgals/year 574.43 SO2 Emission factor = 0.10 x S
 S = Sulfur Content = 0.18 grains/100ft³ ***

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10*	direct PM2.5**	SO2 (0.10S)	NOx	VOC **TOC value	CO
Potential Emission in tons/yr	0.06	0.20	0.20	0.01	3.73	0.29	2.15

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-
 ** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.
 **The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.
 ***Sulfur Content assumed to be 0.18 grains per 100 cubic feet. (AP-42, Table 1.5-1 "Emission Factors for LPG Combustion"; subnote "e".

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
 1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
 (Source - AP-42 (Supplement B 10/96) page 1.5-1)
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
 Propane Emission Factors shown. Please see AP-42 for butane.
 Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Emission Factor in lb/kgal	Greenhouse Gas		
	CO2	CH4	N2O
Potential Emission in tons/yr	3,590	0.1	0.3
Summed Potential Emissions in tons/yr	3,590		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	3,669		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	3,672		

Methodology

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.
 Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
 CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4
 CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Rexam Beverage Can Company
Address City IN Zip: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Permit Number: M127-33668-00030
Reviewer: Daniel W Pell

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Submerged Arc	1			0.036	0.011			0.00	0.00	0.00	0	0.000
Metal Inert Gas (MIG)(carbon steel)	1	100		0.0055	0.0005			0.55	0.05	0.00	0	0.050
Stick (E7018 electrode)	1			0.0211	0.0009			0.00	0.00	0.00	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	1			0.0055	0.0005			0.00	0.00	0.00	0	0.000
Oxyacetylene(carbon steel)	1			0.0055	0.0005			0.00	0.00	0.00	0	0.000
							Welding PM Total		0.550			
							Tons/year =		2.41			
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	0.015625	5	0.1622	0.0005	0.0001	0.0003	0.00	0.00	0.00	0.00	0.000
Oxymethane	1			0.0815	0.0002		0.0002	0.00	0.00	0.00	0.00	0.000
Plasma**	1			0.0039				0.00	0.00	0.00	0.00	0.000
							Flame Cutting PM Total		0.00			
							Tons/year =		0.00			
EMISSION TOTALS												
Potential Emissions lbs/hr								0.55	0.05	0.00	0.00	0.05
Potential Emissions lbs/day								13.22	1.20	0.00	0.00	1.20
Potential Emissions tons/year								2.41	0.22	0.00	0.00	0.22

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Thomas W. Easterly
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: George Martin
Rexam Beverage Can Company
4001 Montdale Park Drive
Valparaiso, IN 46383-0607

DATE: May 1, 2014

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Transition from Title V to a Minor Source Operating Permit (MSOP)
127-33668-00030

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Geoffrey A. Wortley, Director – EH&S
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

May 1, 2014

TO: Valparaiso Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Rexam Beverage Can Company
Permit Number: 127-33668-00030

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 5/1/2014 Rexam Beverage Can Company 127-33668-00030 FINAL			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		George Martin Rexam Beverage Can Company 4001 Montdale Park Dr Valparaiso IN 46383-0607 (Source CAATS)			CONFIRMED DELIVERY							
2		Geoffrey A Wortley Dir - EH&S Rexam Beverage Can Company 8770 W Bryn Mawr Ave Chicago IL 60631-3655 (RO CAATS)										
3		Porter County Board of Commissioners 155 Indiana Ave, Ste 205 Valparaiso IN 46383 (Local Official)										
4		Valparaiso Public Library 103 Jefferson St Valparaiso IN 46383-4899 (Library)										
5		Porter County Health Department 155 Indiana Ave, Suite 104 Valparaiso IN 46383-5502 (Health Department)										
6		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
7		Mr. Ed Dybel 2440 Schrage Avenue Whiting IN 46394 (Affected Party)										
8		Valparaiso City Council and Mayors Office 166 Lincolnway Valparaiso IN 46383-5524 (Local Official)										
9		Mr. Joseph Virgil 128 Kinsale Avenue Valparaiso IN 46385 (Affected Party)										
10		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
11		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
12		Burns Harbor Town Council 1240 N. Boo Rd Burns Harbor IN 46304 (Local Official)										
13		Eric & Sharon Haussman 57 Shore Drive Ogden Dunes IN 46368 (Affected Party)										
14		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
15		Matt Mikus 1710 Vale Park Rd Apt 302 Valparaiso IN 46383 (Affected Party)										

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