



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 4, 2008

RE: Ball Metal Beverage Container Corp. / 181-26916-00022

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

## 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 enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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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December 4, 2008

Ms. Virginia Peck, EHS Manager  
Ball Metal Beverage Container Corp.  
501 North Sixth Street  
Monticello, Indiana 47960

RE: 181-26916-00022  
Second Significant Permit Modification to  
Part 70 Permit No.: T181-17684-00022

Dear Ms. Peck:

The Indiana Department of Environmental Management (IDEM), has received an application from Ball Metal Beverage Container Corp., located at 501 North Sixth Street, Monticello, Indiana 47960, for a significant modification of their Part 70 Operating Permit issued on November 16, 2006. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Ball Metal Beverage Container Corp. to make certain changes at their existing source. Ball Metal Beverage Container Corp. has applied to add the following emission units: one (1) lithographic printing press for printing and overvarnish, identified as PTR-5 with one natural gas-fired drying oven, identified as PO-5; one (1) inside spray machine line, identified as ISM-5, with one natural gas-fired drying oven, identified as ISO-5 with three burners. Two burners are rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each. In addition, the following specifically regulated insignificant activities will be added: one (1) ultraviolet bottom coater, identified as UV-05, with VOC emissions less than three (3) pounds per hour and fifteen (15) pounds per day; one (1) ID system, consisting of ink and cleanup solvents with a VOC potential to emit less than three (3) pounds per hour and less than fifteen (15) pounds per day; and one (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, identified as WO-L5, rated at less than 10 MMBtu/hr.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided. 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 David Matousek, IDEM, Permits Branch, OAQ, 100 North Senate Avenue, MC61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027 and ask for David Matousek or extension 2-8253, or dial direct (317) 232-8253.

Sincerely,  
Original signed by

Tripurari P. Sinha, Ph.D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments  
DJM/djm

CC: File - White County  
U.S. EPA, Region V  
White County Health Department  
Air Compliance Section Inspector  
Compliance Branch  
Administrative and Development Section



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Ball Metal Beverage Container Corp.  
501 North Sixth Street  
Monticello, Indiana 47960**

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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.

First Operation Permit Renewal No.: T181-17684-00022	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 16, 2006  Expiration Date: November 16, 2011

First Administrative Amendment No.: 181-24828-00022, issued on August 9, 2007; and  
First Significant Permit Modification No.: 181-25621-00022, issued on May 12, 2008.

Second Significant Permit Modification No.: 181-26916-00022	
Issued by: Original signed by  Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 4, 2008  Expiration Date: November 16, 2011

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary aluminum based beverage can manufacturing and coating plant.

Source Address:	501 North Sixth Street, Monticello, IN 47960
Mailing Address:	501 North Sixth Street, Monticello, IN 47960
General Source Phone Number:	574-583-9418
SIC Code:	3411
County Location:	White
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Minor Source, under Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Five (5) lithographic printing presses for printing and overvarnish:
- (1) Two (2) constructed in 1993, identified as PTR-1 and PTR-2, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (PO-1 and PO-2), each rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-1, PTR-2, PO-1 and PO-2 are considered existing affected facilities];
  - (2) One (1) constructed in 1993, identified as PTR-3, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-3), rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-3 and PO-3 are considered existing affected facilities];
  - (3) One (1) approved for construction in 2008, identified as PTR-4, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-4), rated at 2.7 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-4 and PO-4 are considered existing affected facilities]; and
  - (4) One (1) approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities].
- (b) One (1) natural gas-fired regenerative thermal oxidizer, constructed in 1988 and identified as RTO-1, rated at 16.0 MMBtu/hr, exhausting to stack TO-1.

- (c) Five (5) inside spray machine lines:
- (1) Two (2) constructed in 1993, identified as ISM-1 and ISM-2, each consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (ISO-1 and ISO-2), each rated at 6.0 MMBtu/hr, and each exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-1, ISM-2, ISO-1 and ISO-2 are considered existing affected facilities];
  - (2) One (1) constructed in 1993, identified as ISM-3, consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (ISO-3), rated at 6.0 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-3 and ISO-3 are considered existing affected facilities];
  - (3) One (1) approved for construction in 2008, identified as ISM-4, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-4 and ISO-4 are considered existing affected facilities]; and
  - (4) One (1) approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities].

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations, identified as CPW-01, with a maximum usage of 220 gallons per twelve (12) consecutive month period for cold cleaner parts washing [326 IAC 8-3-2];
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2];
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2]; and
- (d) One (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, approved for construction in 2008, identified as WO-L5, rated at less than 10 MMBtu/hr [326 IAC 6-3-2].



A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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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 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

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- (a) This permit, T181-17684-00022, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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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 [326 IAC 2-7-7]

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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 [326 IAC 2-7-5(5)]

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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 [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1<sup>st</sup> of each year to:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report 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 annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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.
- (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 or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T181-17684-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

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- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, 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 nine (9) months 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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);



The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document, all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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  
Permits Branch, 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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 2-7-5(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 Opacity [326 IAC 5-1]**

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:

- (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.3 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.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 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  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 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. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 Accredited Asbestos inspector is not federally enforceable.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.7 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, 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. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM 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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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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 2-7-5(1)][326 IAC 2-7-6(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### **C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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- (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.
- (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 [326 IAC 2-7-5][326 IAC 2-7-6]**

### **C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 3, 1996.

(b) Revisions to the ERP shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46204-2251

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-4-7(34).

(c) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

### **C.13 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

### **C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]**

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(a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(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;

(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 maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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- (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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) 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.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]**  
**[326 IAC 2-6]**

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- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), every three (3) years, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ . The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Five (5) lithographic printing presses for printing and overvarnish:
  - (1) Two (2) constructed in 1993, identified as PTR-1 and PTR-2, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (PO-1 and PO-2), each rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-1, PTR-2, PO-1 and PO-2 are considered existing affected facilities];
  - (2) One (1) constructed in 1993, identified as PTR-3, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-3), rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-3 and PO-3 are considered existing affected facilities];
  - (3) One (1) approved for construction in 2008, identified as PTR-4, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-4), rated at 2.7 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-4 and PO-4 are considered existing affected facilities]; and
  - (4) One (1) approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities].
- (b) One (1) natural gas-fired regenerative thermal oxidizer, constructed in 1988 and identified as RTO-1, rated at 16.0 MMBtu/hr, exhausting to stack TO-1.
- (c) Five (5) inside spray machine lines:
  - (1) Two (2) constructed in 1993, identified as ISM-1 and ISM-2, each consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (ISO-1 and ISO-2), each rated at 6.0 MMBtu/hr, and each exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-1, ISM-2, ISO-1 and ISO-2 are considered existing affected facilities];
  - (2) One (1) constructed in 1993, identified as ISM-3, consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (ISO-3), rated at 6.0 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-3 and ISO-3 are considered existing affected facilities];
  - (3) One (1) approved for construction in 2008, identified as ISM-4, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap,

with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-4 and ISO-4 are considered existing affected facilities]; and

- (4) One (1) approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities].

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

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

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

- (a) Pursuant to 326 IAC 8-2-3(b), (Can Coating Operations), the operator of five (5) overvarnish lines, PTR-1 through PTR-5, and five (5) inside spray machine lines, ISM-1 through ISM-5, shall not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:

Coating Line	326 IAC 8-2-3 Limit (lb VOC/gal, less water)
Interior Spray Lines, ISM-1 to ISM-5	4.2
Overvarnish Lines, PTR-1 to PTR-5	2.8

The Permittee shall comply with the VOC content limit in 326 IAC 8-2-3 for inside spray operations ISM-1 to ISM-5 and for printing and overvarnish operations PTR-1 to PTR-5 by using compliant coatings or daily averaging of VOC content or the use of a VOC control device or the use of daily averaging of VOC content and the use of a VOC control device

- (b) Whenever a non-compliant coating is used in any one of the printing and overvarnish lines PTR-1 to PTR-5 or the inside spray lines ISM-1 to ISM-5 and the regenerative thermal oxidizer (RTO-1) is not used to achieve compliance with the VOC content limits in Condition D.1.1(a), compliance with the VOC content limit in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c \times U) / \sum U]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and  
U is the usage rate of the coating in gallons per day.

- (c) Whenever a non-compliant coating is used in any one of the printing and overvarnish lines (PTR-1 to PTR-5) or the inside spray lines (ISM-1 to ISM-5) and the regenerative thermal oxidizer (RTO-1) is used to comply with the VOC content limit in Condition D.1.1(a), the Permittee shall comply with the following:

- (1) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from a unit not using a compliant coating shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in Condition D.1.1(a). The equivalent emission limits are shown in the following table:

Emission Unit	L (lb VOC/gal, less water)	D (lb VOC/gal solvent)	E (lb VOC/gal of coating solids)
Inside Spray Operations ISM-1 to ISM-5	4.2	7.36	9.78
Overvarnish Operations PTR-1 to PTR-5	2.8	7.36	4.52

This equivalency was determined using the following equation:

$$E = L / (1 - (L/D))$$

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;

D= Density of VOC in coating in pounds VOC per gallon of solvent;

E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (2) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer, RTO-1, shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

#### D.1.2 PSD Minor Limit [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents at the five (5) lithographic printing presses and overvarnish lines (PTR- 1 through PTR-5) and the five (5) inside spray machine lines (ISM-1 through ISM-5) shall be limited such that the potential to emit VOC shall be less than 240.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable to the entire source.

**D.1.3 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from the inside spray machines operations shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**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 its emission control devices.

**Compliance Determination Requirements**

**D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

(a) Compliance with the VOC content limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or VOC certifications or VOC certificates of analysis. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC emission limitation in Condition D.1.2 shall be determined based on the following equation:

$$\text{VOC emissions} = (\text{Input VOC to Solvent Wipe Cleaning for Coating Operations}) + [(\text{Input VOC to Printing and Overvarnish Operations PTR-1}) * (1 - \text{CEP1}/100) + (\text{Input VOC to Printing and Overvarnish Operations PTR-2}) * (1 - \text{CEP2}/100) + (\text{Input VOC to Printing and Overvarnish Operations PTR-3}) * (1 - \text{CEP3}/100) + (\text{Input VOC to Printing and Overvarnish Operations PTR-4}) * (1 - \text{CEP4}/100) + (\text{Input VOC to Printing and Overvarnish Operations PTR-5}) * (1 - \text{CEP5}/100)] + [(\text{Input VOC to Inside Spray Operations ISM-1}) * (1 - \text{CEI1}/100) + (\text{Input VOC to Inside Spray Operations ISM-2}) * (1 - \text{CEI2}/100) + (\text{Input VOC to Inside Spray Operations ISM-3}) * (1 - \text{CEI3}/100) + (\text{Input VOC to Inside Spray Operations ISM-4}) * (1 - \text{CEI4}/100) + (\text{Input VOC to Inside Spray Operations ISM-5}) * (1 - \text{CEI5}/100)]$$

Where:

CEP1 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-1, as determined from the latest compliant stack test.

CEP2 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-2, as determined from the latest compliant stack test.

CEP3 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-3, as determined from the latest compliant stack test.

CEP4 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-4, as determined from the latest compliant stack test.

CEP5 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-5, as determined from the latest compliant stack test.

CEI1 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-1, as determined from the latest compliant stack test.

CEI2 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-2, as determined from the latest compliant stack test.

CEI3 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-3, as determined from the latest compliant stack test.

CEI4 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-4, as determined from the latest compliant stack test.

CEI5 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-5, as determined from the latest compliant stack test.

**D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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- (a) No later than July 19, 2012, the Permittee shall conduct a performance test of printing and overvarnish lines PTR-1 to PTR-4 and inside spray lines ISM-1 to ISM-4 to verify the overall VOC control efficiency (as the product of destruction efficiency and capture efficiency) required by Condition D.1.2 for the thermal oxidizer utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Within one hundred and eighty (180) days after initial startup of PTR-5 and/or ISM-5; whichever is later, the Permittee shall conduct a performance test of printing and overvarnish line PTR-5 and inside spray line ISM-5 to verify the overall VOC control efficiency (as a product of destruction efficiency and capture efficiency) as required by Conditions D.1.1(c)(2) and/or D.1.2 for the thermal oxidizer utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

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Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.1.1(a) and (c), the Permittee shall operate the thermal oxidizer (RTO-1) at all times a non-compliant coating is used and daily averaging of VOC content is not used. Proper operation of RTO-1 is required at all times a non-compliant coating is used and daily VOC content averaging is not used.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.8 Monitoring**

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- (a) The following monitoring condition shall apply if baghouse filters are used to control particulate emissions:

Monthly cleaning of the baghouse filters shall be performed including: shaking, pulsing or air pulsing of the bags per manufacturer's recommendation. Semi-annual inspections shall be performed for the presence of overspray near the baghouse. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The following monitoring conditions shall apply if dry filters are used to control particulate emissions:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating stacks while one or more of the spray lines are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray nearby the filters. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (c) The following monitoring conditions shall apply if water pans are used to control particulate emissions:
- (1) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from the surface coating stacks while one or more of the spray lines are in operation. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. Section C - Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation in this permit.
- (d) Particulate control methods other than baghouse filtration, dry filters, or water pans for controlling particulate emissions from the five (5) inside spray machine lines (ISM-1 through ISM-5) are subject to approval by IDEM, OAQ, Permits Branch to determine if additional monitoring conditions are required.

**D.1.9 Thermal Oxidizer Temperature [40 CFR 64]**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer (RTO-1) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as the oxidizer operating temperature. The 3-hour average oxidizer temperature shall be determined once per fifteen (15) minutes either as an output of the data acquisition system or by other means. Upon the operation of printing and overvarnish line PTR-5 and inside spray line ISM-5, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1300 °F or at a temperature determined by the most recent stack test approved by IDEM after startup of PTR-5 and ISM-5.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1(c) and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

Compliance with these requirements satisfies Compliance Assurance Monitoring (CAM) requirements.

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

**D.1.10 Record Keeping Requirements**

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- (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. 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.
  - (2) The amount of coating material and solvent used less water on monthly basis, when using compliant coatings or a VOC control device. The amount of coating material and solvent used less water on a daily basis, when using daily VOC content averaging.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Records kept may be in an electronic format.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The volume weighted VOC content of the coatings used for each month, when using compliant coatings or a VOC control device. The volume weighted VOC content of the coating used for each day, when using daily VOC content averaging;
  - (4) The cleanup solvent usage for coating operations for each month;
  - (5) The total VOC usage for each month; and
  - (6) The dates and times non-compliant coatings are used in PTR-1 to PTR-5 and ISM-1 to ISM-5.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of particulate control method employed and the following:
- (1) When baghouse filtration is used for particulate control, the Permittee shall maintain a log of semi-annual inspections.
  - (2) When dry filters are used for particulate control, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
  - (3) When water pans are used for particulate control, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, and daily and monthly inspections.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a record of the 3-hour average thermal oxidizer temperatures.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 FACILITY OPERATIONS CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities consisting of:

- (a) Degreasing operations, identified as CPW-01, with a maximum usage of 220 gallons per twelve (12) consecutive month period for cold cleaner parts washing [326 IAC 8-3-2];
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2]; and
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2]; and
- (d) One (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, approved for construction in 2008, identified as WO-L5, rated at less than 10 MMBtu/hr. [326 IAC 6-3-2]

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

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

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

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for all parts washers constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.2 Particulate [326 IAC 6-3-2(e)(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. This limit applies to the following insignificant activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (c) One (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, approved for construction in 2008, identified as WO-L5, rated at less than 10 MMBtu/hr. [326 IAC 6-3-2]

## SECTION E.1 FACILITY OPERATION CONDITIONS

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

- (a) Five (5) lithographic printing presses for printing and overvarnish:
- (1) Two (2) constructed in 1993, identified as PTR-1 and PTR-2, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (PO-1 and PO-2), each rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-1, PTR-2, PO-1 and PO-2 are considered existing affected facilities];
  - (2) One (1) constructed in 1993, identified as PTR-3, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-3), rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-3 and PO-3 are considered existing affected facilities];
  - (3) One (1) approved for construction in 2008, identified as PTR-4, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-4), rated at 2.7 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-4 and PO-4 are considered existing affected facilities]; and
  - (4) One (1) approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities].
- (b) Five (5) inside spray machine lines:
- (1) Two (2) constructed in 1993, identified as ISM-1 and ISM-2, each consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (ISO-1 and ISO-2), each rated at 6.0 MMBtu/hr, and each exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-1, ISM-2, ISO-1 and ISO-2 are considered existing affected facilities];
  - (2) One (1) constructed in 1993, identified as ISM-3, consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (ISO-3), rated at 6.0 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-3 and ISO-3 are considered existing affected facilities];
  - (3) One (1) approved for construction in 2008, identified as ISM-4, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC

emission cap, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-4 and ISO-4 are considered existing affected facilities]; and

- (4) One (1) approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities].

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

### **New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]**

#### **E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the five (5) lithographic printing presses (PTR-1 through PTR-5) for overvarnish and the five (5) inside spray machine lines (ISM-1 through ISM-5) except as otherwise specified in 40 CFR Part 60, Subpart WW.

- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

#### **E.1.2 Standards of Performance for the Beverage Can Surface Coating Industry Requirements [40 CFR Part 60, Subpart WW] [326 IAC 12]**

Pursuant to 40 CFR Part 60, Subpart WW, the Permittee shall comply with the provisions of 40 CFR 60, Subpart WW, Standards of Performance for the Beverage Can Surface Coating Industry for the five (5) lithographic printing presses (PTR-1 through PTR-5) for overvarnish and the five (5) inside spray machine lines (ISM-1 through ISM-5). Nonapplicable portions of the NESHAP will not be included in the permit. These facilities are subject to the following portions of Subpart WW:

- (1) 40 CFR 60.490  
(2) 40 CFR 60.491  
(3) 40 CFR 60.492  
(4) 40 CFR 60.493  
(5) 40 CFR 60.495  
(6) 40 CFR 60.496

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Ball Metal Beverage Container Corp.  
Source Address: 501 North Sixth Monticello Indiana 47960  
Mailing Address: 501 North Sixth Monticello Indiana 47960  
Part 70 Permit No.: T181-17684-00022

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Ball Metal Beverage Container Corp.  
Source Address: 501 North Sixth Monticello Indiana 47960  
Mailing Address: 501 North Sixth Monticello Indiana 47960  
Part 70 Permit No.: T181-17684-00022

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
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If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 Part 70 Quarterly Report**

Source Name: Ball Metal Beverage Container Corp.  
 Source Address: 501 North Sixth Monticello Indiana 47960  
 Mailing Address: 501 North Sixth Monticello Indiana 47960  
 Part 70 Permit No.: T181-17684-00022  
 Facility: The five (5) lithographic printing presses and overvarnish lines (PTR-1 through PTR-5) and the five (5) inside spray machine lines (ISM-1 through ISM-5)  
 Parameter: VOC Emissions  
 Limit: Use of VOC, including coatings, dilution solvents, and cleaning solvents shall be limited such that the potential to emit VOC shall be less than 240.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions shall be calculated using the equation in Condition D.1.5(b).

YEAR: \_\_\_\_\_

Month (Specify Dates)	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1: From: _____ To: _____			
Month 2: From: _____ To: _____			
Month 3 From: _____ To: _____			

- No deviation occurred in this quarter.  
 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



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

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Ball Metal Beverage Container Corp.  
Source Address: 501 North Sixth Monticello Indiana 47960  
Mailing Address: 501 North Sixth Monticello Indiana 47960  
Part 70 Permit No.: T181-17684-00022

Dates: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Appendix A - 40 CFR 60, Subpart WW

### Subpart WW— Standards of Performance for the Beverage Can Surface Coating Industry

Source: 48 FR 38737, Aug. 25, 1983, unless otherwise noted.

#### § 60.490 Applicability and designation of affected facility.

- (a) The provisions of this subpart apply to the following affected facilities in beverage can surface coating lines: each exterior base coat operation, each overvarnish coating operation, and each inside spray coating operation.
- (b) The provisions of this subpart apply to each affected facility which is identified in paragraph (a) of this section and commences construction, modification, or reconstruction after November 26, 1980.

#### § 60.491 Definitions.

- (a) All terms which are used in this subpart and are not defined below are given the same meaning as in the Act and subpart A of this part.
- (1) **Beverage can** means any two-piece steel or aluminum container in which soft drinks or beer, including malt liquor, are packaged. The definition does not include containers in which fruit or vegetable juices are packaged.
- (2) **Exterior base coating operation** means the system on each beverage can surface coating line used to apply a coating to the exterior of a two-piece beverage can body. The exterior base coat provides corrosion resistance and a background for lithography or printing operations. The exterior base coat operation consists of the coating application station, flashoff area, and curing oven. The exterior base coat may be pigmented or clear (unpigmented).
- (3) **Inside spray coating operation** means the system on each beverage can surface coating line used to apply a coating to the interior of a two-piece beverage can body. This coating provides a protective film between the contents of the beverage can and the metal can body. The inside spray coating operation consists of the coating application station, flashoff area, and curing oven. Multiple applications of an inside spray coating are considered to be a single coating operation.
- (4) **Overvarnish coating operation** means the system on each beverage can surface coating line used to apply a coating over ink which reduces friction for automated beverage can filling equipment, provides gloss, and protects the finished beverage can body from abrasion and corrosion. The overvarnish coating is applied to two-piece beverage can bodies. The overvarnish coating operation consists of the coating application station, flashoff area, and curing oven.
- (5) **Two-piece can** means any beverage can that consists of a body manufactured from a single piece of steel or aluminum and a top. Coatings for a two-piece can are usually applied after fabrication of the can body.
- (6) **VOC content** means all volatile organic compounds (VOC) that are in a coating. VOC content is expressed in terms of kilograms of VOC per liter of coating solids.
- (b) Notations used under §60.493 of this subpart are defined below:
- Ca = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million as carbon)
- Cb = the VOC concentration in each gas stream entering the control device (parts per million as carbon)

- Dc = density of each coating, as received (kilograms per liter)
- Dd = density of each VOC-solvent added to coatings (kilograms per liter)
- Dr = density of VOC-solvent recovered by an emission control device (kilograms per liter)
- E = VOC destruction efficiency of the control device (fraction)
- F = the proportion of total VOC emitted by an affected facility which enters the control device to total emissions (fraction)
- G = the volume-weighted average of VOC in coatings consumed in a calendar month per volume of coating solids applied (kilograms per liter of coating solids)
- He = the fraction of VOC emitted at the coater and flashoff areas captured by a collection system
- Hh = the fraction of VOC emitted at the cure oven captured by a collection system
- Lc = the volume of each coating consumed, as received (liters)
- Ld = the volume of each VOC-solvent added to coatings (liters)
- Lr = the volume of VOC-solvent recovered by an emission control device (liters)
- Ls = the volume of coating solids consumed (liters)
- Md = the mass of VOC-solvent added to coatings (kilograms)
- Mo = the mass of VOC-solvent in coatings consumed, as received (kilograms)
- Mr = the mass of VOC-solvent recovered by emission control device (kilograms)
- N = the volume-weighted average mass of VOC emissions to atmosphere per unit volume of coating solids applied (kilograms per liter of coating solids)
- Qa = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour)
- Qb = the volumetric flow of each gas stream entering the control device (dry standard cubic meters per hour)
- R = the overall emission reduction efficiency for an affected facility (fraction)
- Se = the fraction of VOC in coating and diluent VOC-solvent emitted at the coater and flashoff area for a coating operation
- Sh = the fraction of VOC in coating and diluent solvent emitted at the cure oven for a coating operation
- Vs = the proportion of solids in each coating, as received (fraction by volume)
- Wo = the proportion of VOC in each coating, as received (fraction by weight).

**§ 60.492 Standards for volatile organic compounds.**

On or after the date on which the initial performance test required by §60.8(a) is completed, no owner or operator subject to the provisions of this subpart shall discharge or cause the discharge of VOC emissions to the atmosphere that exceed the following volume-weighted calendar-month average emissions:

- (a) 0.29 kilogram of VOC per litre of coating solids from each two-piece can exterior base coating operation, except clear base coat;
- (b) 0.46 kilogram of VOC per litre of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and
- (c) 0.89 kilogram of VOC per litre of coating solids from each two-piece can inside spray coating operation.

**§ 60.493 Performance test and compliance provisions.**

- (a) Section 60.8(d) does not apply to monthly performance tests and §60.8(f) does not apply to the performance test procedures required by this subpart.
- (b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test each calendar month for each affected facility.
  - (1) The owner or operator shall use the following procedures for each affected facility that does not use a capture system and a control device to comply with the emission limit specified under §60.492. The owner or operator shall determine the VOC-content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine from company records the volume of coating and the mass of VOC-solvent added to coatings. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each facility by using the average dry weight of coating, number of cans, and size of cans being processed by each affected and existing facility or by other procedures acceptable to the Administrator.
    - (i) Calculate the volume-weighted average of the total mass of VOC per volume of coating solids used during the calendar month for each affected facility, except as provided under paragraph (b)(1)(iv) of this section. The volume-weighted average of the total mass of VOC per volume of coating solids used each calendar month will be determined by the following procedures.

- (A) Calculate the mass of VOC used ( $M_o + M_d$ ) during the calendar month for the affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}, \quad (1)$$

[ $\sum L_{dj} D_{dj}$  will be 0 if no VOC solvent is added to the coatings, as received.] where n is the number of different coatings used during the calendar month and m is the number of different diluent VOC-solvents used during the calendar month.

- (B) Calculate the total volume of coating solids used ( $L_s$ ) in the calendar month for the affected facility by the following equation:

$$L_s = \sum_{i=1}^n L_{vi} V_{\bar{x}}, \quad (2)$$

where n is the number of different coatings used during the calendar month.

- (C) Calculate the volume-weighted average mass of VOC per volume of solids used (G) during the calendar month for the affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \quad (3)$$

- (ii) Calculate the volume-weighted average of VOC emissions discharged to the atmosphere (N) during the calendar month for the affected facility by the following equation:

$$N = G \quad (4)$$

- (iii) Where the value of the volume-weighted average mass of VOC per volume of solids discharged to the atmosphere (N) is equal to or less than the applicable emission limit specified under §60.492, the affected facility is in compliance.
- (iv) If each individual coating used by an affected facility has a VOC content equal to or less than the limit specified under §60.492, the affected facility is in compliance provided no VOC-solvents are added to the coating during distribution or application.

- (2) An owner or operator shall use the following procedures for each affected facility that uses a capture system and a control device that destroys VOC (e.g., incinerator) to comply with the emission limit specified under §60.492.

- (i) Determine the overall reduction efficiency (R) for the capture system and control device.

For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (b)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency for the performance test providing control device and capture system operating conditions have not changed. The procedure in paragraphs (b)(2)(i), (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

- (A) Determine the fraction (F) of total VOC used by the affected facility that enters the control device using the following equation:

$$F = S_e H_e + S_h H_h, \quad (5)$$

where  $H_e$  and  $H_h$  shall be determined by a method that has been previously approved by the Administrator. The owner or operator may use the values of  $S_e$  and  $S_h$  specified in table 1 or other values determined by a method that has been previously approved by the Administrator.

**Table 1—Distribution of VOC Emissions**

Coating operation	Emission distribution	
	Coater/flashoff (S <sub>e</sub> )	Curing oven (S <sub>h</sub> )
Two-piece aluminum or steel can:		
Exterior base coat operation	0.75	0.25
Overvarnish coating operation	0.75	0.25
Inside spray coating operation	0.80	0.20

- (B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n Q_{bi} C_{bi} - \sum_{j=1}^m Q_{aj} C_{aj}}{\sum_{i=1}^n Q_{bi} C_{bi}}, \quad (6)$$

where n is the number of vents before the control device, and m is the number of vents after the control device.

- (C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF \quad (7)$$

- (ii) Calculate the volume-weighted average of the total mass of VOC per volume of coating solids (G) used during the calendar month for the affected facility using equations (1), (2), and (3).
- (iii) Calculate the volume-weighted average of VOC emissions discharged to the atmosphere (N) during the calendar month by the following equation:

$$N = G \times [1 - R] \quad (8)$$

- (iv) If the volume-weighted average of mass of VOC emitted to the atmosphere for the calendar month (N) is equal to or less than the applicable emission limit specified under §60.492, the affected facility is in compliance.

- (3) An owner or operator shall use the following procedure for each affected facility that uses a capture system and a control device that recovers the VOC (e.g., carbon adsorber) to comply with the applicable emission limit specified under §60.492.

- (i) Calculate the volume-weighted average of the total mass of VOC per unit volume of coating solids applied (G) used during the calendar month for the affected facility using equations (1), (2), and (3).
- (ii) Calculate the total mass of VOC recovered (M<sub>r</sub>) during each calendar month using the following equation:

$$M_r = L_r D_r \quad (9)$$

- (iii) Calculate overall reduction efficiency of the control device (R) for the calendar month for the affected facility using the following equation:

$$R = \frac{M_r}{M_o + M_d} \quad (10)$$

- (iv) Calculate the volume-weighted average mass of VOC discharged to the atmosphere (N) for the calendar month for the affected facility using equation (8).
- (v) If the weighted average of VOC emitted to the atmosphere for the calendar month (N) is equal to or less than the applicable emission limit specified under §60.492, the affected facility is in compliance.

[48 FR 38737, Aug. 25, 1983, as amended at 65 FR 61763, Oct. 17, 2000]

#### **§ 60.494 Monitoring of emissions and operations**

The owner or operator of an affected facility that uses a capture system and an incinerator to comply with the emission limits specified under §60.492 shall install, calibrate, maintain, and operate temperature measurement devices as prescribed below.

- (a) Where thermal incineration is used, a temperature measurement device shall be installed in the firebox. Where catalytic incineration is used, temperature measurement devices shall be installed in the gas stream immediately before and after the catalyst bed.
- (b) Each temperature measurement device shall be installed, calibrated, and maintained according to the manufacturer's specifications. The device shall have an accuracy of 0.75 percent of the temperature being measured, expressed in degrees Celsius, or  $\pm 2.5$  °C, whichever is greater.
- (c) Each temperature measurement device shall be equipped with a recording device so that a permanent continuous record is produced.

[48 FR 38737, Aug. 25, 1983, as amended at 65 FR 61763, Oct. 17, 2000]

#### **§ 60.495 Reporting and recordkeeping requirements.**

- (a) The owner or operator of an affected facility shall include the following data in the initial compliance report required under §60.8(a).
- (1) Where only coatings which individually have a VOC content equal to or less than the limits specified under §60.492 are used, and no VOC is added to the coating during the application or distribution process, the owner or operator shall provide a list of the coatings used for each affected facility and the VOC content of each coating calculated from data determined using Method 24 or supplied by the manufacturers of the coatings.
- (2) Where one or more coatings which individually have a VOC content greater than the limits specified under §60.492 are used or where VOC are added or used in the coating process, the owner or operator shall report for each affected facility the volume-weighted average of the total mass of VOC per volume of coating solids.
- (3) Where compliance is achieved through the use of incineration, the owner or operator shall include in the initial performance test required under §60.8(a) the combustion temperature (or the gas temperature upstream and downstream of the catalyst bed), the total mass of VOC per volume of coating solids before and after the incinerator, capture efficiency, and the destruction efficiency of the incinerator used to attain compliance with the applicable



emission limit specified under §60.492. The owner or operator shall also include a description of the method used to establish the amount of VOC captured by the capture system and sent to the control device.

- (b) Following the initial performance test, each owner or operator shall identify, record, and submit quarterly reports to the Administrator of each instance in which the volume-weighted average of the total mass of VOC per volume of coating solids, after the control device, if capture devices and control systems are used, is greater than the limit specified under §60.492. If no such instances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.
- (c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit at the frequency specified in §60.7(c) the following:
  - (1) Where compliance with §60.492 is achieved through the use of thermal incineration, each 3-hour period when cans are processed, during which the average temperature of the device was more than 28 °C below the average temperature of the device during the most recent performance test at which destruction efficiency was determined as specified under §60.493.
  - (2) Where compliance with §60.492 is achieved through the use of catalytic incineration, each 3-hour period when cans are being processed, during which the average temperature of the device immediately before the catalyst bed is more than 28 °C below the average temperature of the device immediately before the catalyst bed during the most recent performance test at which destruction efficiency was determined as specified under §60.493 and all 3-hour periods, when cans are being processed, during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference across the catalyst bed during the most recent performance test at which destruction efficiency was determined as specified under §60.494.
  - (3) For thermal and catalytic incinerators, if no such periods as described in paragraphs (c)(1) and (c)(2) of this section occur, the owner or operator shall state this in the report.
- (d) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine VOC emissions from each affected facility in the initial and monthly performance tests. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion chamber temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed. Where compliance is achieved through the use of a solvent recovery system, the owner or operator shall maintain at the source daily records of the amount of solvent recovered by the system for each affected facility.
- (e) The requirements of this section remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected facilities within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[47 FR 49612, Nov. 1, 1982, as amended at 55 FR 51384, Dec. 13, 1990; 65 FR 61763, Oct. 17, 2000]

**§ 60.496 Test methods and procedures.**

- (a) The reference methods in appendix A to this part, except as provided in §60.8, shall be used to conduct performance tests.
  - (1) Method 24, an equivalent or alternative method approved by the Administrator, or manufacturers' formulation data from which the VOC content of the coatings used for each affected facility can be calculated. In the event of a dispute, Method 24 data shall govern. When VOC content of water-borne coatings, determined from data generated by Method 24,

is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24.

- (2) Method 25 or an equivalent or alternative method for the determination of the VOC concentration in the effluent gas entering and leaving the control device for each stack equipped with an emission control device. The owner or operator shall notify the Administrator at least 30 days in advance of any State test using Method 25. The following reference methods are to be used in conjunction with Method 25:
  - (i) Method 1 for sample and velocity traverses,
  - (ii) Method 2 for velocity and volumetric flow rate,
  - (iii) Method 3 for gas analysis, and
  - (iv) Method 4 for stack gas moisture.
- (b) For Method 24, the coating sample must be a 1-litre sample collected in a 1-litre container at a point where the sample will be representative of the coating material.
- (c) For Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sample volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator. The Administrator will approve the sampling of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that the testing of representative stacks would yield results comparable to those that would be obtained by testing all stacks.

[48 FR 38737, Aug. 25, 1983, as amended at 65 FR 61763, Oct. 17, 2000]

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

**Technical Support Document (TSD) for a Part 70  
Minor Source Modification and Significant Permit Modification**

**Source Description and Location**

Source Name:	Ball Metal Beverage Container Corp.
Source Location:	501 North Sixth Street, Monticello, Indiana 47960
County:	White County
SIC Code:	3411
Operation Permit No.:	T 181-17684-00022
Operation Permit Issuance Date:	November 16, 2006
Minor Source Modification No.:	181-26874-00022
Significant Permit Modification No.:	181-26916-00022
Permit Reviewer:	David J. Matousek

**Existing Approvals**

The source was issued Part 70 Operating Permit No. T181-17684-00022 on November 16, 2006. The source has since received the following approvals:

- (a) First Administrative Amendment No. 181-24828-00022, issued on August 9, 2007;
- (b) First Interim Significant Source Modification No. 181-25614I-00022, issued on December 27, 2007;
- (c) First Minor Source Modification No. 181-25614-00022, issued on March 14, 2008;
- (d) First Significant Permit Modification No. 181-25621-00022, issued May 12, 2008; and
- (e) First Interim Minor Source Modification No. 181-26874I-00022, issued on August 29, 2008.

**County Attainment Status**

The source is located in White County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. White County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>
- White County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants
- White County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
- Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

<b>Source Status</b>
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The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
PM	6.87
PM <sub>10</sub>	10.81
PM <sub>2.5</sub>	10.81
SO <sub>2</sub>	0.42
VOC	249.00
CO	58.15
NO <sub>x</sub>	69.23

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

- (b) These emissions are based upon the Technical Support Document (TSD) for minor source modification number 181-25614-00022 and significant permit modification number 181-25621-00022.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (ton/yr)
Single	0.19
Total	0.38

This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (ton/yr)
PM <sub>10</sub>	0.7
PM <sub>2.5</sub>	0.7
SO <sub>2</sub>	0.0
VOC	73.8
CO	6.9
NO <sub>x</sub>	8.2
HAP	Not Reported
Total HAPs	Not Reported

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Ball Metal Beverage Container Corp. on August 14, 2008, relating to the addition of a new can coating line to produce a newly developed can for the beverage industry. This modification will consist of the construction of a stand alone can coating line and support equipment. The following is a list of the proposed emission unit(s) and pollution control device(s):

- (a) One (1) lithographic printing press for printing and overvarnish, approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities].
- (b) One (1) inside spray machine line, approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities].

The following is a list of specifically regulated insignificant activities:

- (a) One (1) ultraviolet bottom coater, approved for construction in 2008, identified as UV-05, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with VOC emission less than three (3) pounds per hour and fifteen (15) pounds per day;
- (b) One (1) ID system, consisting of ink and cleanup solvents with a VOC potential to emit less than three (3) pounds per hour and less than fifteen (15) pounds per day; and
- (c) One (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, approved for construction in 2008, identified as WO-L5, rated at less than 10 MMBtu/hr [326 IAC 6-3-2].

Since the ultraviolet bottom coater and ID system do not have applicable rules, they will not be included in the permit.

<b>Enforcement Issues</b>
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There are no pending enforcement actions.

<b>Emission Calculations</b>
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See Appendix A of this Technical Support Document for detailed emission calculations.

<b>Permit Level Determination – Part 70</b>
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Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>PTE Before Controls of the Modification</b>	
<b>Pollutant</b>	<b>Potential To Emit (ton/yr)</b>
PM	7.06
PM <sub>10</sub>	7.62
PM <sub>2.5</sub>	7.62
SO <sub>2</sub>	2.80
VOC	217.57
CO	8.24
NO <sub>x</sub>	9.81

<b>HAP PTE Before Controls of the Modification</b>	
<b>HAPs</b>	<b>Potential To Emit (ton/yr)</b>
Formaldehyde	0.03
2-(2-butoxyethoxy)ethanol	15.64
Hexyl Cellosolve	15.24
Combustion HAPs	0.18
<b>TOTAL</b>	<b>31.09</b>

This source modification is subject to 326 IAC 2-7-10.5(d)(8), because the modification adds emission units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission units.

The modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires significant changes in Part 70 terms or conditions.

**Permit Level Determination – PSD or Emission Offset**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 minor source modification and significant permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

<b>Process / Emission Unit</b>	<b>Potential to Emit (ton/yr)</b>					
	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>VOC</b>	<b>CO</b>	<b>NO<sub>x</sub></b>
Washer Dry Off Oven, WO-L5	0.08	0.33	1.25	0.24	3.68	4.38
Printer Oven, PO-5	0.08	0.33	1.25	0.24	3.68	4.38
Inside Spray Oven, ISO-5	0.02	0.08	0.30	0.06	0.88	1.05
Inking Operation, PTR-5	0.00	0.00	0.00	1.60	0.00	0.00
Overvarnish/Rim Coat, PTR-5	0.00	0.00	0.00	29.26	0.00	0.00
Inside Spray Machine, ISM-5	0.01	0.01	0.00	21.23	0.00	0.00
<b>Total for Modification</b>	<b>0.19</b>	<b>0.75</b>	<b>2.80</b>	<b>52.63</b>	<b>8.24</b>	<b>9.81</b>
<b>Total for Source Before Modification</b>	<b>6.87</b>	<b>10.81</b>	<b>0.42</b>	<b>249.00</b>	<b>58.15</b>	<b>69.23</b>
<b>Total for Source After Modification</b>	<b>7.06</b>	<b>11.56</b>	<b>3.22</b>	<b>249.00</b>	<b>66.39</b>	<b>79.04</b>
<b>Major Source Threshold</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>

This modification to an existing minor stationary source is not major because the source wide emissions are still less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

The following federal rules are applicable to the source due to this modification:

**NSPS:**

- (a) This modification includes facilities that are subject to the New Source Performance Standards for the Beverage Can Surface Coating Industry (40 CFR 60.490, Subpart WW), which is incorporated by reference as 326 IAC 12. The provisions of this 40 CFR 60, Subpart WW apply to each exterior base coat operation, each overvarnish coating operation, and each inside spray coating operation. The overvarnish coating operation consists of the coating application station, flashoff area and the curing oven. The inside spray coating operation consists of the coating application station, the flashoff area and the curing oven. The facilities subject to this rule include the following:

Five (5) lithographic printing presses for printing and overvarnish:

- (1) Two (2) constructed in 1993, identified as PTR-1 and PTR-2, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (PO-1 and PO-2), each rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-1, PTR-2, PO-1 and PO-2 are considered existing affected facilities];
- (2) One (1) constructed in 1993, identified as PTR-3, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-3), rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-3 and PO-3 are considered existing affected facilities];
- (3) One (1) approved for construction in 2008, identified as PTR-4, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-4), rated at 2.7 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-4 and PO-4 are considered existing affected facilities]; and
- (4) One (1) approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities].

Five (5) inside spray machine lines:

- (1) Two (2) constructed in 1993, identified as ISM-1 and ISM-2, each consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (ISO-1 and ISO-2), each rated at 6.0 MMBtu/hr, and each exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-1, ISM-2, ISO-1 and ISO-2 are considered existing affected facilities];
- (2) One (1) constructed in 1993, identified as ISM-3, consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired



drying oven (ISO-3), rated at 6.0 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-3 and ISO-3 are considered existing affected facilities];

- (3) One (1) approved for construction in 2008, identified as ISM-4, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-4 and ISO-4 are considered existing affected facilities]; and
- (4) One (1) approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities].

These facilities are subject to the following portions of Subpart WW:

- (1) 40 CFR 60.490
- (2) 40 CFR 60.491
- (3) 40 CFR 60.492
- (4) 40 CFR 60.493
- (5) 40 CFR 60.495
- (6) 40 CFR 60.496

Compliance with sections 40 CFR 60.494 and 40 CFR 60.495 is obtained with thermal incineration and not a catalyst bed.

**NESHAP:**

- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Cans, Subpart KKKK because the source does not emit and does not have the potential to emit, considering controls any single HAP at a rate of ten (10) tons or more per year or any combination of HAPs at a rate of twenty-five (25) tons or more per year.

**CAM:**

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

<b>Emission Unit</b>	<b>Control Device Used</b>	<b>Emission Limitation (Y/N)</b>	<b>Uncontrolled PTE (ton/yr)</b>	<b>Controlled PTE (ton/yr)</b>	<b>Major Source Threshold (ton/yr)</b>	<b>CAM Applicable (Y/N)</b>	<b>Large Unit (Y/N)</b>
PTR-5 (Printing) -VOC	RTO	Y	6.65	1.60	100	N	N
PTR-5 (Overvarnish & Rim Coat) - VOC	RTO	Y	121.91	29.26	100	Y	N
ISM-5 - VOC	RTO	Y	88.47	21.23	100	N	N
ISM-5-PM/PM10	Baghouse	N	N/A	N/A	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to PTR-5 (Overvarnish and Rim Coating) for VOC upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application. The Permittee submitted a CAM plan on July 16, 2003 for PTR-1 to PTR-3 and ISM-1 to ISM-3. The CAM requirements will be consistent with the existing emission units.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source due to the modification:

**326 IAC 2-2 and 2-3 (PSD and Emission Offset)**

When modification applications are submitted, the permit history of the source is reviewed to ensure related projects are not submitted in a manner to circumvent the source modification requirements of 326 IAC 2-7-10.5 or the requirements of 326 IAC 2-2 or 326 IAC 2-3. In this case, the source submitted a modification application on December 4, 2007 for Minor Source Modification No. 181-25614-00022 and Significant Permit Modification No. 181-25621-00022, later issued on March 14, 2008 and May 12, 2008, respectively. This modification consisted of the addition of one lithographic printing press for printing and overvarnish, one inside spray line, the addition of specifically regulated insignificant activities, the removal of an end making line and the modification of the degreasing operation. The current project, Minor Source Modification 181-26874-00022 and Significant Permit Modification 181-26916-00022, also intend to install a lithographic printing press and inside spray machine. IDEM reviewed the information submitted by the applicant and believes the current project should be considered unrelated to the modification under MSM 181-25614-00022 and SPM 181-25621-00022. As part of the application, the applicant stated the proposed printing press and inside spray machine are being added to allow the production of a newly developed Alumi-tek cone shaped container with a threaded neck. This can is just being introduced to the beer and beverage market. The unique and exclusive shape of this container makes the equipment being installed as part of the current project a stand alone line. Therefore, IDEM considers MSM 181-25614-00022 and SPM 181-25621-00022 a separate project from Minor Source Modification 181-26874-00022 and Significant Permit Modification 181-26916-00022.

This modification to an existing minor stationary source is not major because the source wide emissions of each regulated pollutant are less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of the entire source will still emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

Ball Metal Beverage Container Corp.  
Monticello, Indiana  
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2nd Minor Source Modification No.: 181-26874-00022  
2nd Significant Permit Modification No.: 181-26916-00022

### 326 IAC 8-2-3 (Can Coating Operations)

The provisions of 326 IAC 8-2-3 apply to can coating operations for facilities in any county for which construction commenced after January 1, 1980 and which have potential emissions of twenty-five (25) tons or greater per year of VOC. The overvarnish operations associated with PTR-5 and the inside spray operations associated with ISM-5 are subject to the provisions of 326 IAC 8-2-3. The emission limitations for the inside spray and overvarnish operations due to this modification are as follows:

- (a) Pursuant to 326 IAC 8-2-3(b)(2), the Permittee shall not discharge into the atmosphere any VOC in excess of 4.2 pounds per gallon, excluding water, delivered to the coating applicator from two- and three-piece can interior body spray and two-piece can exterior end (spray or roll coat) operations. Compliance with this emission limit shall be achieved with the use of compliant coatings or daily averaging of VOC content or the use of a regenerative thermal oxidizer, RTO-1, or the use of daily averaging of VOC content and the use of a thermal oxidizer; and
- (b) Pursuant to 326 IAC 8-2-3(b)(5), the Permittee shall not discharge into the atmosphere any VOC in excess of 2.8 pounds per gallon, excluding water, delivered to the coating applicator from two-piece can exterior (basecoat and overvarnish) operations. Compliance with this emission limit shall be achieved by the use of compliant coatings, daily averaging of VOC content or the use of a regenerative thermal oxidizer, RTO-1, or the use of daily averaging of VOC content and the use of a thermal oxidizer.

In order to comply with the emission limits listed above, the Permittee can comply with the requirements of 326 IAC 8-2-3 by the following methods:

- (a) The use of compliant coatings; or
- (b) The use of daily averaging of VOC content; or
- (c) The use of a VOC control device; or
- (d) The use of daily averaging of VOC content and the use of a VOC control device.

The Permittee shall comply with the VOC content limit in 326 IAC 8-2-3 for inside spray operations ISM-1 to ISM-5 and for printing and overvarnish operations PTR-1 to PTR-5 by using compliant coatings or daily averaging of VOC content or the use of a VOC control device or the use of daily averaging of VOC content and the use of a VOC control device.

The current permit contains the use of compliant coatings to comply with the 326 IAC 8-2-3 emission limits. At the request of the Permittee, the following compliance options for non-compliant coatings have been added to the permit:

- (a) Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.1.1(a) and (c), the Permittee shall operate the thermal oxidizer (RTO-1) at all times a non-compliant coating is used and daily averaging of VOC content is not used. Proper operation of RTO-1 is required at all times a non-compliant coating is used and daily VOC content averaging is not used.
- (b) Whenever a non-compliant coating is used in any one of the printing and overvarnish lines PTR-1 to PTR-5 or the inside spray lines ISM-1 to ISM-5 and the regenerative thermal oxidizer (RTO-1) is not used to achieve compliance with the VOC content limits in Condition D.1.1(a), compliance with the VOC content limit in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [ \sum (c \times U) / \sum U ]$$

Where:

- A is the volume weighted average in pounds VOC per gallon less water as applied;
- C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

(c) Whenever a non-compliant coating is used in any one of the printing and overvarnish lines (PTR-1 to PTR-5) or the inside spray lines (ISM-1 to ISM-5) and the regenerative thermal oxidizer (RTO-1) is used to comply with the VOC content limit in Condition D.1.1(a), the Permittee shall comply with the following:

(1) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from a unit not using a compliant coating shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in Condition D.1.1(a). The equivalent emission limits are shown in the following table:

Emission Unit	L (lb VOC/gal, less water)	D (lb VOC/gal solvent)	E (lb VOC/gal of coating solids)
Inside Spray Operations ISM-1 to ISM-5	4.2	7.36	9.78
Overvarnish Operations PTR-1 to PTR-5	2.8	7.36	4.52

This equivalency was determined using the following equation:

$$E = L / (1 - (L/D))$$

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;

D= Density of VOC in coating in pounds VOC per gallon of solvent;

E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(2) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer, RTO-1, shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

**326 IAC 8-3-2 (Cold Cleaner Operation)**

This modification does not change any of the applicable requirements of the cold cleaner parts washer operation under this rule.

**326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

The provisions of 326 IAC 8-1-6 apply to new facilities as of January 1, 1980 that have potential emissions of twenty-five (25) tons or more per year of VOC; are located anywhere in the state; and that are not otherwise regulated by other provisions of article 8, 326 IAC 20-48, of 326 IAC 20-56.

PTR-5 and ISM-5 are subject to 326 IAC 8-2-3 and all other emissions units associated with this modification have potential emissions less than twenty-five (25) tons per year of VOC. Therefore, the provisions of 326 IAC 8-1-6 do not apply to any units due to this modification.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the Line 5 inside spray machine, ISM-5, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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 Determination Requirements applicable to this modification are as follows:

<b>Emission Unit</b>	<b>Parameter</b>	<b>Frequency</b>
PTR-1 to PTR-5 and ISM-1 to ISM-5	Use of Control Device (VOC)	Operation of RTO required when using non-compliant coatings and not using daily VOC content averaging.
ISM-5	Use of Control Device (PM)	Operation of dry filter, waterwash, or an equivalent control device as approved by IDEM.

Testing		
Emission Unit	Parameter	Frequency
PTR-5	Overall VOC Control Efficiency	Within 180 days of startup of PTR-5 or ISM-5, whichever is later / Every 5 years
PTR-1 to PTR-4	VOC Destruction Efficiency	No later than July 19, 2012 / Every 5 Years
ISM-5	Overall VOC Control Efficiency	Within 180 days of start up of PTR-5 or ISM-5, whichever is later / Every 5 years
ISM-1 to ISM-4	VOC Destruction Efficiency	No later than July 19, 2012 / Every 5 years

There are no new Compliance Monitoring Requirements applicable to this modification:

<b>Proposed Changes</b>
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The changes listed below have been made to Part 70 Operating Permit No. T181-17684-00022. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

**Modification No. 1:**

To match the current format of Part 70 Operating Permits, existing Condition B.25 - Term of Conditions has been renumbered to B.3 and existing Condition B.4 - Termination of Right to Operate has been renumbered to B.14. The other Section B conditions have been renumbered as required to allow revisions to existing Conditions B.25 and B.4. These conditions have only been reordered in the permit. There are no changes proposed to the text of the conditions.

**Modification No. 2:**

Existing Condition C.12 - Emergency Reduction Plans has been updated to clarify the requirements of the source to submit a revised ERP when the approved plan is modified. 316 IAC 1-5-3 requires operators of facilities required to have submitted an ERP to immediately put into effect the actions stipulated in the "approved ERP" for the appropriate episode level. If the "approved ERP" is modified by the source, a revised ERP shall be submitted to IDEM for approval. Proposed revisions to Condition C.12 follow:

C.12 Emergency Reduction Plans ~~[326 IAC 1-5-2]~~**[326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 3, 1996.
- (b) **Revisions to the ERP shall be submitted for approval to:**

**Indiana Department of Environmental Management  
 Compliance Branch, Office of Air Quality  
 MC 61-53, IGCN 1003  
 Indianapolis, Indiana 46204-2251**



**The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-4-7(34).**

- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**Modification No. 3:**

The emission unit and pollution control equipment descriptions in Section A.2 and the specifically regulated insignificant activities in Section A.3 have been revised to show the addition of coating line 5. In addition, the units specifically regulated under 40 CFR 60, Subpart WW are now identified. Finally, the formatting of the emission unit descriptions of PTR-1 to PTR-4 and ISM-1 to ISM-4 have been updated to make the format consistent throughout the permit, no changes are proposed. Revisions to Section A.2 and A.3 are shown below:

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

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

- (a) ~~Four (4)~~ **Five (5)** lithographic printing presses for printing and overvarnish:
- (1) Two (2) constructed in 1993, identified as PTR-1 and PTR-2, each with a maximum **worst case emission capacity which is based on capacity of 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with two (2) natural gas-fired drying ovens (PO-1 and PO-2), each rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 **[Under 40 CFR 60, Subpart WW, PTR-1, PTR-2, PO-1 and PO-2 are considered existing affected facilities];**
  - 2) One (1) constructed in 1993, identified as PTR-3, with a maximum **worst case emission capacity which is based on capacity of 138,000 twelve (12) ounce cans per hour or 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with one (1) natural gas-fired drying oven (PO-3), rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1; **and [Under 40 CFR 60, Subpart WW, PTR-3 and PO-3 are considered existing affected facilities];**
  - (3) One (1) approved for construction in 2008, identified as PTR-4, with a maximum **worst case emission capacity which is based on capacity of 114,000 sixteen (16) ounce cans per hour or 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with one (1) natural gas-fired drying oven (PO-4), rated at 2.7 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1; **[Under 40 CFR 60, Subpart WW, PTR-4 and PO-4 are considered existing affected facilities]; and**
  - (4) **One (1) approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities].**
- (b) One (1) natural gas-fired regenerative thermal oxidizer, constructed in 1988 and identified as RTO-1, rated at 16.0 MMBtu/hr, exhausting to stack TO-1.

- (c) ~~Four (4)~~ **Five (5)** inside spray machine lines:
- (1) Two (2) constructed in 1993, identified as ISM-1 and ISM-2, each consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, each with a **maximum worst case emission capacity which is based on coating capacity of 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with two (2) natural gas-fired drying ovens (ISO-1 and ISO-2), each rated at 6.0 MMBtu/hr, and each exhausting to the thermal oxidizer, RTO-1 [**Under 40 CFR 60, Subpart WW, ISM-1, ISM-2, ISO-1 and ISO-2 are considered existing affected facilities**];
  - (2) One (1) constructed in 1993, identified as ISM-3, consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a **maximum worst case emission capacity which is based on coating capacity of 138,000 twelve (12) ounce cans per hour or 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with one (1) natural gas-fired drying oven (ISO-3), rated at 6.0 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1; and [**Under 40 CFR 60, Subpart WW, ISM-3 and ISO-3 are considered existing affected facilities**];
  - (3) ~~One (1) approved for construction in 2008, identified as ISM-4, with a coating capacity of 114,000 sixteen (16) ounce cans per hour or 102,000 twenty four (24) ounce cans per hour, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1.~~ **One (1) approved for construction in 2008, identified as ISM-4, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-4 and ISO-4 are considered existing affected facilities]; and**
  - (4) **One (1) approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities].**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations, identified as CPW-01, with a maximum usage of 220 gallons per twelve (12) consecutive month period for cold cleaner parts washing [**326 IAC 8-3-2**];
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2]; and

- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2]; **and**
- (d) **One (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, approved for construction in 2008, identified as WO-L5, rated at less than 10 MMBtu/hr. [326 IAC 6-3-2]**

#### Modification No. 4:

The facility description box in Section D.1 has been revised to reflect the addition of coating line 5 to the source as described in Section A.2. The revised facility description box follows:

### SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) ~~Four (4)~~ **Five (5)** lithographic printing presses for printing and overvarnish:
  - (1) Two (2) constructed in 1993, identified as PTR-1 and PTR-2, each with a maximum **worst case emission capacity which is based on capacity of 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with two (2) natural gas-fired drying ovens (PO-1 and PO-2), each rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 **[Under 40 CFR 60, Subpart WW, PTR-1, PTR-2, PO-1 and PO-2 are considered existing affected facilities]**;
  - (2) One (1) constructed in 1993, identified as PTR-3, with a maximum **worst case emission capacity which is based on capacity of 138,000 twelve (12) ounce cans per hour or 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with one (1) natural gas-fired drying oven (PO-3), rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1; **and [Under 40 CFR 60, Subpart WW, PTR-3 and PO-3 are considered existing affected facilities]**;
  - (3) One (1) approved for construction in 2008, identified as PTR-4, with a maximum **worst case emission capacity which is based on capacity of 114,000 sixteen (16) ounce cans per hour or 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap**, with one (1) natural gas-fired drying oven (PO-4), rated at 2.7 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1; **[Under 40 CFR 60, Subpart WW, PTR-4 and PO-4 are considered existing affected facilities]**; and
  - (4) **One (1) approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities]**.
- (b) One (1) natural gas-fired regenerative thermal oxidizer, constructed in 1988 and identified as RTO-1, rated at 16.0 MMBtu/hr, exhausting to stack TO-1.
- (c) ~~Four (4)~~ **Five (5)** inside spray machine lines:

- (1) Two (2) constructed in 1993, identified as ISM-1 and ISM-2, each consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, each with a **maximum worst case emission capacity which is based on coating capacity** of 138,000 twelve (12) ounce cans per hour, **variable can sizes and line speeds are possible within the VOC emission cap**, with two (2) natural gas-fired drying ovens (ISO-1 and ISO-2), each rated at 6.0 MMBtu/hr, and each exhausting to the thermal oxidizer, RTO-1 [**Under 40 CFR 60, Subpart WW, ISM-1, ISM-2, ISO-1 and ISO-2 are considered existing affected facilities**];
- (2) One (1) constructed in 1993, identified as ISM-3, consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a **maximum worst case emission capacity which is based on coating capacity** of 138,000 twelve (12) ounce cans per hour or 114,000 sixteen (16) ounce cans per hour, **variable can sizes and line speeds are possible within the VOC emission cap**, with one (1) natural gas-fired drying oven (ISO-3), rated at 6.0 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1; and [**Under 40 CFR 60, Subpart WW, ISM-3 and ISO-3 are considered existing affected facilities**];
- (3) One (1) approved for construction in 2008, identified as ISM-4, with a coating capacity of 114,000 sixteen (16) ounce cans per hour or 102,000 twenty-four (24) ounce cans per hour, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1. One (1) approved for construction in 2008, identified as ISM-4, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a **maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1** [**Under 40 CFR 60, Subpart WW, ISM-4 and ISO-4 are considered existing affected facilities**]; and
- (4) One (1) approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a **maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1** [**Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities**].

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

#### Modification No. 5:

Existing Condition D.1.1 - Volatile Organic Compounds (VOC) [326 IAC 8-2-3] has been updated to reflect the addition of PTR-5 and ISM-5. An alternate compliance method has been added to the condition to allow greater flexibility. Revisions to existing Condition D.1.1 are shown below:

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

- (a) Pursuant to 326 IAC 8-2-3(b), (Can Coating Operations), the operator of ~~four (4)~~ **five (5)** overvarnish lines, PTR-1 through PTR-4 **PTR-5**, and ~~four (4)~~ **five (5)** inside spray machine lines, ISM-1 through ~~ISM-4~~ **ISM-5**, shall not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:

Coating	326 IAC 8-2-3 Limit (lb VOC/gal), less water
Interior Spray	4.2
Overvarnish	2.8

Coating Line	326 IAC 8-2-3 Limit (lb VOC/gal, less water)
Interior Spray Lines, ISM-1 to ISM-5	4.2
Overvarnish Lines, PTR-1 to PTR-5	2.8

The Permittee shall comply with the VOC content limit in 326 IAC 8-2-3 for inside spray operations ISM-1 to ISM-5 and for printing and overvarnish operations PTR-1 to PTR-5 by using compliant coatings or daily averaging of VOC content or the use of a VOC control device or the use of daily averaging of VOC content and the use of a VOC control device

- (b) Whenever a non-compliant coating is used in any one of the printing and overvarnish lines PTR-1 to PTR-5 or the inside spray lines ISM-1 to ISM-5 and the regenerative thermal oxidizer (RTO-1) is not used to achieve compliance with the VOC content limits in Condition D.1.1(a), compliance with the VOC content limit in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c \times U) / \sum U]$$

Where:

- A is the volume weighted average in pounds VOC per gallon less water as applied;
- C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
- U is the usage rate of the coating in gallons per day.

- (c) Whenever a non-compliant coating is used in any one of the printing and overvarnish lines (PTR-1 to PTR-5) or the inside spray lines (ISM-1 to ISM-5) and the regenerative thermal oxidizer (RTO-1) is used to comply with the VOC content limit in Condition D.1.1(a), the Permittee shall comply with the following:

- (1) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from a unit not using a compliant coating shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in Condition D.1.1(a). The equivalent emission limits are shown in the following table:

Emission Unit	L (lb VOC/gal, less water)	D (lb VOC/gal solvent)	E (lb VOC/gal of coating solids)
Inside Spray Operations ISM-1 to ISM-5	4.2	7.36	9.78
Overvarnish Operations PTR-1 to PTR-5	2.8	7.36	4.52

This equivalency was determined using the following equation:

$$E = L / (1 - (L/D))$$

Where:

**L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;**  
**D= Density of VOC in coating in pounds VOC per gallon of solvent;**  
**E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.**

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (2) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer, RTO-1, shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

**V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.**  
**E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.**  
**O = Equivalent overall efficiency of the capture system and control device as a percentage.**

#### Modification No. 6:

Existing Condition D.1.2 - PSD Minor Limit [326 IAC 2-2] has been updated to reflect the addition of PTR-5 and ISM-5. There are no changes proposed to the existing PSD minor limit. The new equipment will continue to comply with the existing limit on the potential to emit VOC. Also, CP 181-5079-00022 is no longer enforceable; therefore, the references to it and MSM 181-25614-00022 have been removed. The revised Condition follows:

#### D.1.2 PSD Minor Limit [326 IAC 2-2]

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Pursuant to CP 181-5079-00022, issued on June 12, 1996 and revised by MSM 181-25614-00022, the use of VOC, including coatings, dilution solvents, and cleaning solvents at the four (4) **five (5)** lithographic printing presses and overvarnish lines (PTR- 1 through PTR-4 **PTR-5**) and the four (4) **five (5)** inside spray machine lines (ISM-1 through ISM-4 **ISM-5**) shall be limited such that the potential to emit VOC shall be less than 240.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable **to the entire source**.

### Modification No. 7:

Existing Condition D.1.5 has been modified to remove the rule citation for 40 CFR 60.493. All requirements for compliance with the NSPS have been moved to Section E.1. In addition, the equation in permit condition D.1.5(b) was revised to indicate the emission units making up the individual coating operations and the equation was modified to provide an allowance for individual capture efficiencies. Revisions to D.1.5 are shown below:

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)] ~~[40 CFR 60.493]~~

- (a) Compliance with the VOC content limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, **or** VOC certifications, **or** VOC certificates of analysis. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the VOC emission limitation in Condition D.1.2 shall be determined based on the following equation:

$$\begin{aligned} \text{VOC emissions} = & (\text{Input VOC to Solvent Wipe Cleaning for Coating Operations}) + \\ & [(\text{Input VOC to Printing and Overvarnish Operations PTR-1}) * (1 - \text{CEP1}/100) + \\ & (\text{Input VOC to Printing and Overvarnish Operations PTR-2}) * (1 - \text{CEP2}/100) + \\ & (\text{Input VOC to Printing and Overvarnish Operations PTR-3}) * (1 - \text{CEP3}/100) + \\ & (\text{Input VOC to Printing and Overvarnish Operations PTR-4}) * (1 - \text{CEP4}/100) + \\ & (\text{Input VOC to Printing and Overvarnish Operations PTR-5}) * (1 - \text{CEP5}/100)] + \\ & [(\text{Input VOC to Inside Spray Operations ISM-1}) * (1 - \text{CEI1}/100) + (\text{Input VOC to Inside Spray Operations ISM-2}) * (1 - \text{CEI2}/100) + (\text{Input VOC to Inside Spray Operations ISM-3}) * (1 - \text{CEI3}/100) + (\text{Input VOC to Inside Spray Operations ISM-4}) * (1 - \text{CEI4}/100) + (\text{Input VOC to Inside Spray Operations ISM-5}) * (1 - \text{CEI5}/100)] \end{aligned}$$

Where: ~~GE = Percent Overall Control Efficiency of the thermal oxidizer, RTO-1, as determined from the latest stack test.~~

**CEP1 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-1, as determined from the latest compliant stack test.**

**CEP2 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-2, as determined from the latest compliant stack test.**

**CEP3 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-3, as determined from the latest compliant stack test.**

**CEP4 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-4, as determined from the latest compliant stack test.**

**CEP5 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for PTR-5, as determined from the latest compliant stack test.**

**CEI1 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-1, as determined from the latest compliant stack test.**

**CEI2 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-2, as determined from the latest compliant stack test.**

**CEI3 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-3, as determined from the latest compliant stack test.**

**CEI4 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-4, as determined from the latest compliant stack test.**

**CEI5 = Percent Overall VOC Control Efficiency for the thermal oxidizer (RTO-1) for ISM-5, as determined from the latest compliant stack test.**

### Modification No. 8:

Existing Condition D.1.6 has been revised to require testing to show compliance with Condition D.1.1(c)(2) at startup of PTR-5 and ISM-5. Revisions to existing Condition D.1.6, now Condition D.1.8, are shown below:

#### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Before July 19, 2012, the Permittee shall conduct a performance test to verify VOC control efficiency (as the product of destruction efficiency and capture efficiency) required by condition D.1.2 for the thermal oxidizer utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.~~

- (a) **No later than July 19, 2012, the Permittee shall conduct a performance test of printing and overvarnish lines PTR-1 to PTR-4 and inside spray lines ISM-1 to ISM-4 to verify the overall VOC control efficiency (as the product of destruction efficiency and capture efficiency) required by Condition D.1.2 for the thermal oxidizer utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.**
- (b) **Within one hundred and eighty (180) days after initial startup of PTR-5 and/or ISM-5; whichever is later, the Permittee shall conduct a performance test of printing and overvarnish line PTR-5 and inside spray line ISM-5 to verify the overall VOC control efficiency (as a product of destruction efficiency and capture efficiency) as required by Conditions D.1.1(c)(2) and/or D.1.2 for the thermal oxidizer utilizing methods as approved by the Commissioner. The destruction efficiency test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.**

### Modification No. 9:

A new Condition D.1.7 has been added to the permit to allow the use of the regenerative thermal oxidizer and daily VOC content averaging as alternative compliance determination methods for overvarnish line PTR-5 to show compliance with 326 IAC 8-2-3. All remaining Section D.1 conditions have been renumbered to allow the insertion of Condition D.1.7. The proposed condition follows:

#### D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

**Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.1.1(a) and (c), the Permittee shall operate the thermal oxidizer (RTO-1) at all times a non-compliant coating is used and daily averaging of VOC content is not used. Proper operation of RTO-1 is required at all times a non-compliant coating is used and daily VOC content averaging is not used.**

### Modification No. 10:

Existing Condition D.1.7 has been renumbered to Condition D.1.8 and ISM-5 has been added to Condition D.1.8(d). An explanation of manufacturer's recommendations has been added to Condition D.1.8(a). The revised condition follows:

#### D.1.78 Monitoring

- (a) The following monitoring condition shall apply if baghouse filters are used to control particulate emissions:



Monthly cleaning of the baghouse filters shall be performed **including: shaking, pulsing or air pulsing of the bags** per manufacturer's recommendation. ~~and~~ Semi-annual inspections shall be performed for the presence of overspray near the baghouse. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

...

- (d) Particulate control methods other than baghouse filtration, dry filters, or water pans for controlling particulate emissions from the ~~four (4)~~ **five (5)** inside spray machine lines (ISM-1 through ~~ISM-4~~ **ISM-5**) are subject to approval by IDEM, OAQ, Permits Branch to determine if additional monitoring conditions are required.

#### Modification No. 11:

Existing Condition D.1.8 has been renumbered to Condition D.1.9. Condition D.1.9(a) has been revised to require the operation of a continuous temperature monitoring system upon startup of PTR-5 and ISM-5. In addition, D.1.9(b) has been revised to require a three hour average temperature to show compliance with Condition D.1.1(c)(2). The revised condition follows:

#### D.1.89 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer (RTO-1) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as the oxidizer operating temperature. The 3-hour average oxidizer temperature shall be determined once per fifteen (15) minutes either as an output of the data acquisition system or by other means. ~~From the date of issuance of this permit until approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1300 °F whenever the oxidizer is in operation.~~ **Upon the operation of printing and overvarnish line PTR-5 and inside spray line ISM-5, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1300 °F or at a temperature determined by the most recent stack test approved by IDEM after startup of PTR-5 and ISM-5.**
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions **D.1.1(c) and** D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

Compliance with these requirements satisfies Compliance Assurance Monitoring (CAM) requirements.

#### Modification No. 12:

Existing Condition D.1.9 has been renumbered to Condition D.1.10. In addition, the condition has been revised to include record keeping requirements related to the use of non-complaint coatings and daily VOC content averaging and the use of a VOC control device. Finally, references to other conditions have been updated due to the new numbering system. Revisions to Condition D.1.10 are shown below:

#### D.1.910 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 (~~5~~) below. Records maintained for (1) through (~~5~~)

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. 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.
  - (2) The amount of coating material and solvent used less water on monthly basis, **when using compliant coatings or a VOC control device. The amount of coating material and solvent used less water on a daily basis, when using daily VOC content averaging.**
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Records kept may be in an electronic format.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The volume weighted VOC content of the coatings used for each month, **when using compliant coatings or a VOC control device. The volume weighted VOC content of the coating used for each day, when using daily VOC content averaging;**
  - (4) The cleanup solvent usage for coating operations for each month; ~~and~~
  - (5) The total VOC usage for each month-; **and**
  - (6) **The dates and times non-compliant coatings are used in PTR-1 to PTR-5 and ISM-1 to ISM-5.**
- (b) To document compliance with Condition D.1.~~78~~, the Permittee shall maintain a log of particulate control method employed and the following:
- (1) When baghouse filtration is used for particulate control, the Permittee shall maintain a log of semi-annual inspections.
  - (2) When dry filters are used for particulate control, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
  - (3) When water pans are used for particulate control, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, and daily and monthly inspections.
- (c) To document compliance with Condition D.1.~~89~~, the Permittee shall maintain a record of the 3-hour average thermal oxidizer temperatures.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Modification No. 13:**

Existing Section D.1 has been revised to remove the references and detailed requirements of 40 CFR 60, Subpart WW. The requirements of 40 CFR 60, Subpart WW have not changed. They are now included by reference in a new Section E.1. Only the applicable portions of the NSPS are shown in Section E.1. The entire text of 40 CFR 60, Subpart WW has been added to the permit as Appendix A. The sections removed from Section D.1 and the new Section E.1 are shown below:

## **~~New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]~~**

### ~~D.1.11 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]~~

~~(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A—General Provisions, which are incorporated by reference as 326 IAC 12-1 for the four (4) lithographic printing presses (PTR-1 through PTR-4) for overvarnish and the four (4) inside spray machine lines (ISM-1 through ISM-4) except as otherwise specified in 40 CFR Part 60, Subpart WW.~~

~~(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:~~

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

### ~~D.1.12 Standards of Performance for the Beverage Can Surface Coating Industry Requirements [40 CFR Part 60, Subpart WW] [326 IAC 12]~~

~~Pursuant to 40 CFR Part 60, Subpart WW, the Permittee shall comply with the provisions of 40 CFR 60, Subpart WW, Standards of Performance for the Beverage Can Surface Coating Industry for the four (4) lithographic printing presses (PTR-1 through PTR-4) for overvarnish and the four (4) inside spray machine lines (ISM-1 through ISM-4) as specified as follows.~~

#### ~~§ 60.490 Applicability and designation of affected facility.~~

~~(a) The provisions of this subpart apply to the following affected facilities in beverage can surface coating lines: each exterior base coat operation, each overvarnish coating operation, and each inside spray coating operation.~~

~~(b) The provisions of this subpart apply to each affected facility which is identified in paragraph (a) of this section and commences construction, modification, or reconstruction after November 26, 1980.~~

#### ~~§ 60.491 Definitions.~~

~~(a) All terms which are used in this subpart and are not defined below are given the same meaning as in the Act and subpart A of this part.~~

~~(1) *Beverage can* means any two-piece steel or aluminum container in which soft drinks or beer, including malt liquor, are packaged. The definition does not include containers in which fruit or vegetable juices are packaged.~~

~~(2) *Exterior base coating operation* means the system on each beverage can surface coating line used to apply a coating to the exterior of a two-piece beverage can body. The exterior base coat provides corrosion resistance and a background for lithography or printing operations. The exterior base coat operation consists of the coating application station, flashoff area, and curing oven. The exterior base coat may be pigmented or clear (unpigmented).~~

~~(3) *Inside spray coating operation* means the system on each beverage can surface coating line used to apply a coating to the interior of a two-piece beverage can body. This coating provides a protective film between the contents of the beverage can and the metal can body. The inside spray coating operation consists of the coating application station, flashoff area, and curing oven. Multiple applications of an inside spray coating are considered to be a single coating operation.~~

~~(4) *Overvarnish coating operation* means the system on each beverage can surface coating line used to apply a coating over ink which reduces friction for automated beverage can filling equipment, provides gloss, and protects the finished beverage can body from abrasion and corrosion. The overvarnish coating is applied to two-piece beverage can bodies. The overvarnish coating operation consists of the coating application station, flashoff area, and curing oven.~~

(5) ~~Two-piece can~~ means any beverage can that consists of a body manufactured from a single piece of steel or aluminum and a top. Coatings for a two-piece can are usually applied after fabrication of the can body.

(6) ~~VOC content~~ means all volatile organic compounds (VOC) that are in a coating. VOC content is expressed in terms of kilograms of VOC per liter of coating solids.

(b) ~~Notations used under §60.493 of this subpart are defined below:~~

~~$C_a$ =the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million as carbon)~~

~~$C_b$ =the VOC concentration in each gas stream entering the control device (parts per million as carbon)~~

~~$D_e$ =density of each coating, as received (kilograms per liter)~~

~~$D_d$ =density of each VOC solvent added to coatings (kilograms per liter)~~

~~$D_r$ =density of VOC solvent recovered by an emission control device (kilograms per liter)~~

~~$E$ =VOC destruction efficiency of the control device (fraction)~~

~~$F$ =the proportion of total VOC emitted by an affected facility which enters the control device to total emissions (fraction)~~

~~$G$ =the volume weighted average of VOC in coatings consumed in a calendar month per volume of coating solids applied (kilograms per liter of coating solids)~~

~~$H_e$ =the fraction of VOC emitted at the coater and flashoff areas captured by a collection system~~

~~$H_h$ =the fraction of VOC emitted at the cure oven captured by a collection system~~

~~$L_e$ =the volume of each coating consumed, as received (liters)~~

~~$L_d$ =the volume of each VOC solvent added to coatings (liters)~~

~~$L_r$ =the volume of VOC solvent recovered by an emission control device (liters)~~

~~$L_s$ =the volume of coating solids consumed (liters)~~

~~$M_e$ =the mass of VOC solvent added to coatings (kilograms)~~

~~$M_o$ =the mass of VOC solvent in coatings consumed, as received (kilograms)~~

~~$M_r$ =the mass of VOC solvent recovered by emission control device (kilograms)~~

~~$N$ =the volume weighted average mass of VOC emissions to atmosphere per unit volume of coating solids applied (kilograms per liter of coating solids)~~

~~$Q_a$ =the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour)~~

~~$Q_b$ =the volumetric flow of each gas stream entering the control device (dry standard cubic meters per hour)~~

~~$R$ =the overall emission reduction efficiency for an affected facility (fraction)~~

~~$S_e$ =the fraction of VOC in coating and diluent VOC solvent emitted at the coater and flashoff area for a coating operation~~

~~$S_h$ =the fraction of VOC in coating and diluent solvent emitted at the cure oven for a coating operation~~

~~$V_s$ =the proportion of solids in each coating, as received (fraction by volume)~~

$W_e$  = the proportion of VOC in each coating, as received (fraction by weight).

~~§ 60.492—Standards for volatile organic compounds.~~

~~On or after the date on which the initial performance test required by §60.8(a) is completed, no owner or operator subject to the provisions of this subpart shall discharge or cause the discharge of VOC emissions to the atmosphere that exceed the following volume-weighted calendar-month average emissions:~~

~~(a) 0.29 kilogram of VOC per litre of coating solids from each two-piece can exterior base coating operation, except clear base coat;~~

~~(b) 0.46 kilogram of VOC per litre of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and~~

~~(c) 0.89 kilogram of VOC per litre of coating solids from each two-piece can inside spray coating operation.~~

~~§ 60.493—Performance test and compliance provisions.~~

~~(a) Section 60.8(d) does not apply to monthly performance tests and §60.8(f) does not apply to the performance test procedures required by this subpart.~~

~~(b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test each calendar month for each affected facility.~~

~~(1) The owner or operator shall use the following procedures for each affected facility that does not use a capture system and a control device to comply with the emission limit specified under §60.492. The owner or operator shall determine the VOC content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine from company records the volume of coating and the mass of VOC solvent added to coatings. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each facility by using the average dry weight of coating, number of cans, and size of cans being processed by each affected and existing facility or by other procedures acceptable to the Administrator.~~

~~(i) Calculate the volume-weighted average of the total mass of VOC per volume of coating solids used during the calendar month for each affected facility, except as provided under paragraph (b)(1)(iv) of this section. The volume-weighted average of the total mass of VOC per volume of coating solids used each calendar month will be determined by the following procedures:~~

~~(A) Calculate the mass of VOC used ( $M_o + M_d$ ) during the calendar month for the affected facility by the following equation:~~

$$\cancel{M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj},} \quad (1)$$

~~[ $\sum L_{dj} D_{dj}$  will be 0 if no VOC solvent is added to the coatings, as received.] where n is the number of different coatings used during the calendar month and m is the number of different diluent VOC solvents used during the calendar month.~~

~~(B) Calculate the total volume of coating solids used ( $L_s$ ) in the calendar month for the affected facility by the following equation:~~

$$\cancel{L_s = \sum_{i=1}^n L_{ci} V_{si},} \quad (2)$$

~~where n is the number of different coatings used during the calendar month.~~

~~(C) Calculate the volume-weighted average mass of VOC per volume of solids used (G) during the calendar month for the affected facility by the following equation:~~

$$G = \frac{M_o + M_d}{L_s} \quad (3)$$

~~(ii) Calculate the volume-weighted average of VOC emissions discharged to the atmosphere (N) during the calendar month for the affected facility by the following equation:~~

$$N = G \quad (4)$$

~~(iii) Where the value of the volume-weighted average mass of VOC per volume of solids discharged to the atmosphere (N) is equal to or less than the applicable emission limit specified under §60.492, the affected facility is in compliance.~~

~~(iv) If each individual coating used by an affected facility has a VOC content equal to or less than the limit specified under §60.492, the affected facility is in compliance provided no VOC solvents are added to the coating during distribution or application.~~

#### ~~§ 60.495—Reporting and recordkeeping requirements.~~

~~(a) The owner or operator of an affected facility shall include the following data in the initial compliance report required under §60.8(a).~~

~~(1) Where only coatings which individually have a VOC content equal to or less than the limits specified under §60.492 are used, and no VOC is added to the coating during the application or distribution process, the owner or operator shall provide a list of the coatings used for each affected facility and the VOC content of each coating calculated from data determined using Method 24 or supplied by the manufacturers of the coatings.~~

~~(2) Where one or more coatings which individually have a VOC content greater than the limits specified under §60.492 are used or where VOC are added or used in the coating process, the owner or operator shall report for each affected facility the volume-weighted average of the total mass of VOC per volume of coating solids.~~

~~(b) Following the initial performance test, each owner or operator shall identify, record, and submit quarterly reports to the Administrator of each instance in which the volume-weighted average of the total mass of VOC per volume of coating solids, after the control device, if capture devices and control systems are used, is greater than the limit specified under §60.492. If no such instances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.~~

~~(d) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine VOC emissions from each affected facility in the initial and monthly performance tests. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion chamber temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed. Where compliance is achieved through the use of a solvent recovery system, the owner or operator shall maintain at the source daily records of the amount of solvent recovered by the system for each affected facility.~~

~~(e) The requirements of this section remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(e) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected facilities within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.~~

#### ~~60.496—Test methods and procedures.~~

~~(a) The reference methods in appendix A to this part, except as provided in §60.8, shall be used to conduct performance tests.~~

~~(1) Method 24, an equivalent or alternative method approved by the Administrator, or manufacturers' formulation data from which the VOC content of the coatings used for each affected facility can be calculated. In the event of a dispute, Method 24 data shall govern. When VOC content of water borne coatings, determined from data generated by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24.~~

~~(b) For Method 24, the coating sample must be a 1 litre sample collected in a 1 litre container at a point where the sample will be representative of the coating material.~~

~~(d) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine VOC emissions from each affected facility in the initial and monthly performance tests. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion chamber temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed. Where compliance is achieved through the use of a solvent recovery system, the owner or operator shall maintain at the source daily records of the amount of solvent recovered by the system for each affected facility.~~

~~(e) The requirements of this section remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected facilities within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.~~

## SECTION E.1 FACILITY OPERATION CONDITIONS

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

- (a) Five (5) lithographic printing presses for printing and overvarnish:
- (1) Two (2) constructed in 1993, identified as PTR-1 and PTR-2, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (PO-1 and PO-2), each rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-1, PTR-2, PO-1 and PO-2 are considered existing affected facilities];
  - (2) One (1) constructed in 1993, identified as PTR-3, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-3), rated at 4 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-3 and PO-3 are considered existing affected facilities];
  - (3) One (1) approved for construction in 2008, identified as PTR-4, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-4), rated at 2.7 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, PTR-4 and PO-4 are considered existing affected facilities]; and
  - (4) One (1) approved for construction in 2008, identified as PTR-5, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (PO-5), rated at less than ten (10) MMBtu/hr, and

exhausting to the thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, PTR-5 and PO-5 are considered affected facilities].

**(b) Five (5) inside spray machine lines:**

- (1) Two (2) constructed in 1993, identified as ISM-1 and ISM-2, each consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, each with a maximum worst case emission capacity which is based on 138,000 twelve (12) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with two (2) natural gas-fired drying ovens (ISO-1 and ISO-2), each rated at 6.0 MMBtu/hr, and each exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-1, ISM-2, ISO-1 and ISO-2 are considered existing affected facilities];**
- (2) One (1) constructed in 1993, identified as ISM-3, consisting of six machines, each using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 114,000 sixteen (16) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with one (1) natural gas-fired drying oven (ISO-3), rated at 6.0 MMBtu/hr, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-3 and ISO-3 are considered existing affected facilities];**
- (3) One (1) approved for construction in 2008, identified as ISM-4, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 102,000 twenty-four (24) ounce cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-4), with two (2) 0.8 MMBtu/hr burners and one (1) 1.6 MMBtu/hr burner, and exhausting to the thermal oxidizer, RTO-1 [Under 40 CFR 60, Subpart WW, ISM-4 and ISO-4 are considered existing affected facilities]; and**
- (4) One (1) approved for construction in 2008, identified as ISM-5, using airless application systems with filtering so that no overspray is visibly detectable at the exhaust, with a maximum worst case emission capacity which is based on 43,200 cans per hour, variable can sizes and line speeds are possible within the VOC emission cap, with natural gas drying oven (ISO-5), with three (3) burners, two rated at less than 1 MMBtu/hr and one at less than 0.4 MMBtu/hr each, and exhausting to thermal oxidizer RTO-1 [Under 40 CFR 60, Subpart WW, ISM-5 and ISO-5 are considered affected facilities].**

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

**New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]**

**E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the five (5) lithographic printing presses (PTR-1 through PTR-5) for overvarnish and the five (5) inside spray machine lines (ISM-1 through ISM-5) except as otherwise specified in 40 CFR Part 60, Subpart WW.**
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:**



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

**E.1.2 Standards of Performance for the Beverage Can Surface Coating Industry Requirements  
[40 CFR Part 60, Subpart WW] [326 IAC 12]**

Pursuant to 40 CFR Part 60, Subpart WW, the Permittee shall comply with the provisions of 40 CFR 60, Subpart WW, Standards of Performance for the Beverage Can Surface Coating Industry for the five (5) lithographic printing presses (PTR-1 through PTR-5) for overvarnish and the five (5) inside spray machine lines (ISM-1 through ISM-5). Nonapplicable portions of the NESHAP will not be included in the permit. These facilities are subject to the following portions of Subpart WW:

- (1) 40 CFR 60.490
- (2) 40 CFR 60.491
- (3) 40 CFR 60.492
- (4) 40 CFR 60.493
- (5) 40 CFR 60.495
- (6) 40 CFR 60.496

**Modification No. 14:**

The facility description box in Section D.2 has been updated to add the ID system and the washer drying oven. The revised facility description box follows:

**SECTION D.2 FACILITY OPERATIONS CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:** Insignificant Activities consisting of:

- (a) Degreasing operations, identified as CPW-01, with a maximum usage of 220 gallons per twelve (12) consecutive month period for cold cleaner parts washing [326 IAC 8-3-2];
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2]; and
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2].
- (d) **One (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, approved for construction in 2008, identified as WO-L5, rated at less than 10 MMBtu/hr. [326 IAC 6-3-2]**

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

### Modification No. 15:

Condition D.2.2 has been updated to add the new insignificant activity. The revised condition follows:

#### D.2.2 Particulate [326 IAC 6-3-2(e)(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. This limit applies to the following insignificant activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (c) **One (1) line of equipment for metal working, processing hot water, closed loop heating and cooling, and ovens with natural gas burners less than 10 MMBtu/hr, including: one (1) natural gas-fired Washer Drying Oven, approved for construction in 2008, identified as WO-L5, rated at less than 10 MMBtu/hr. [326 IAC 6-3-2]**

### Modification No. 16:

The quarterly reporting form has been updated to reflect the addition of PTR-5 and ISM-5. The header of the revised reporting form follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
Part 70 Quarterly Report**

Source Name: Ball Metal Beverage Container Corp.  
Source Address: 501 North Sixth Monticello Indiana 47960  
Mailing Address: 501 North Sixth Monticello Indiana 47960  
Part 70 Permit No.: T181-17684-00022  
Facility: The ~~four (4)~~ **five (5)** lithographic printing presses and overvarnish lines (PTR-1 through ~~PTR-4~~ **PTR-5**) and the ~~four (4)~~ **five (5)** inside spray machine lines (ISM-1 through ~~ISM-4~~ **ISM-5**)  
Parameter: VOC Emissions  
Limit: Use of VOC, including coatings, dilution solvents, and cleaning solvents shall be limited such that the potential to emit VOC shall be less than 240.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. **VOC emissions shall be calculated using the equation in Condition D.1.5(b).**  
~~VOC emissions = (Input VOC to Solvent Wipe Cleaning for Coating Operations + [(Input VOC to Printing and Overvarnish Operations \* (1 - CE/100))] + [(Input VOC to Inside Spray Operations) \* (1 - CE/100)]~~  
Where: CE = Percent Overall Control Efficiency of the thermal oxidizer, RTO 1, as determined from the latest stack test.

<b>Conclusion and Recommendation</b>
--------------------------------------

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 181-26874-00022 and Significant Permit Modification No. 181-26916-00022. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

**Appendix A: Emissions Summary Sheet**

**Company Name:** Ball Metal Beverage Container Corp.  
**Address City IN Zip:** 501 North Sixth Street, Monticello, Indiana 47960  
**Permit Number:** MSM 181-26874-00022 and SPM 181-26916-00022  
**Pit ID:** 181-00022  
**Reviewer:** David J. Matousek  
**Date:** September 9, 2008

Unlimited Potential to Emit of the Modification Before Control (tons/yr)									
Emission Unit	PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAP
Washer Dry Off Oven, WO-L5 (Insignificant Activity)	0.08	0.33	0.33	1.25	0.24	3.68	4.38	0.08	0.08
Printer Oven, PO-5 (Insignificant Activity)	0.08	0.33	0.33	1.25	0.24	3.68	4.38	0.08	0.08
Inside Spray Oven, ISO-5 (Insignificant Activity)	0.02	0.08	0.08	0.30	0.06	0.88	1.05	0.02	0.02
Inking Operation, PTR-5	0.00	0.00	0.00	0.00	6.65	0.00	0.00	0.0034	0.0034
Overvarnish/Rim Coat, PTR-5	0.00	0.00	0.00	0.00	121.91	0.00	0.00	15.64	15.67
Inside Spray Machine, ISM-5	6.88	6.88	6.88	0.00	88.47	0.00	0.00	15.24	15.24
<b>Total for Modification</b>	<b>7.06</b>	<b>7.62</b>	<b>7.62</b>	<b>2.80</b>	<b>217.57</b>	<b>8.24</b>	<b>9.81</b>	<b>---</b>	<b>31.09</b>

Limited Potential to Emit of the Modification after Control (tons/yr)									
Emission Unit	PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAP
Washer Dry Off Oven, WO-L5 (Insignificant Activities)	0.08	0.33	0.33	1.25	0.24	3.68	4.38	0.08	0.08
Printer Oven, PO-5 (Insignificant Activities)	0.08	0.33	0.33	1.25	0.24	3.68	4.38	0.08	0.08
Inside Spray Oven, ISO-5 (Insignificant Activities)	0.02	0.08	0.08	0.30	0.06	0.88	1.05	0.02	0.02
Inking Operation, PTR-5	0.00	0.00	0.00	0.00	1.60	0.00	0.00	0.0008	0.0008
Overvarnish/Rim Coat, PTR-5	0.00	0.00	0.00	0.00	29.26	0.00	0.00	3.75	3.76
Inside Spray Machine, ISM-5	0.01	0.01	0.01	0.00	21.23	0.00	0.00	3.66	3.66
<b>Total for Modification</b>	<b>0.19</b>	<b>0.75</b>	<b>0.75</b>	<b>2.80</b>	<b>52.63</b>	<b>8.24</b>	<b>9.81</b>	<b>---</b>	<b>7.60</b>

**Notes:**

- VOC emissions from this modification will be governed by an existing PSD minor limit designed to keep the VOC emissions from PTR-1 to PTR-4 and ISM-1 to ISM-4 under 240.2 tons per year of VOC. The VOC limit will remain at 240.2 tons per year; however, it will now include PTR-1 to PTR-5 and ISM-1 to ISM-5.
- Emissions shown above are considered the worst case emissions for the modification.
- The applicant stated the throughput of the new can coating line is variable. As the product size increases, the throughput of the line decreases. The applicant provided emission calculations as part of the application that are "worst case." The actual product size and line throughput may increase or decrease; however, emissions will never exceed those shown in the table above.
- HAP emissions from this source after control are less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. The source will remain a minor source under Section 112 of the Clean Air Act.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations - UV Bottom Coater**

**Company Name: Ball Metal Beverage Container Corp.  
Address City IN Zip: 501 North Sixth Street, Monticello, Indiana 47960  
Permit Number: MSM 181-26874-00022 and SPM 181-26916-00022  
Plt ID: 181-00022  
Reviewer: David J. Matousek  
Date: September 9, 2008**

**Uncontrolled Emissions**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
<b>Inside Spray - ISM-5</b>																	
ICI Paints / 640CX2134	8.45	79.30%	66.0%	13.3%	66.0%	16.60%	0.000416	43200.000	3.305	1.124	20.200	484.79	88.474	6.884	6.770	95.0%	
<b>Overvarnish PTR-5</b>																	
ICI Paints / 646C250	8.78	65.80%	20.5%	45.3%	21.6%	26.09%	0.000162	43200.000	5.073	3.977	27.833	667.983	121.907	0.000	15.25	100.0%	
<b>Total for Surface Coating</b>												48.033	1152.77	210.38	6.88		

**State Potential Emissions**

**Add worst case coating to all solvents**

**48.03      1152.77      210.38      6.88**

**Controlled Emissions**

Material	Uncontrolled PTE of VOC (ton/year)	Overall Control Efficiency	Controlled PTE of VOC (ton/year)	Uncontrolled PTE of Particulate Matter (ton/year)	Overall Control Efficiency	Controlled PTE of Particulate (ton/year)
<b>Inside Spray - ISM-5</b>						
ICI Paints / 640CX2134	88.474	76.0%	21.234	6.88400	99.9%	0.007
<b>Overvarnish PTR-5</b>						
ICI Paints / 646C250	121.907	76.0%	29.258	0.00000	99.9%	0.000

**METHODOLOGY**

The applicant provided emission calculations as part of the application  
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of 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-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name: Ball Metal Beverage Container Corp.**  
**Address City IN Zip: 501 North Sixth Street, Monticello, Indiana 47960**  
**Permit Number: MSM 181-26874-00022 and SPM 181-26916-00022**  
**Plt ID: 181-00022**  
**Permit Reviewer: David J. Matousek**  
**Date: September 9, 2008**

**Uncontrolled Emissions**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Wt% 2-(2-butoxyethoxy) ethanol	Wt% Free Formaldehyde	Wt% Hexyl Cellosolve	PTE (ton/year) 2-(2-butoxyethoxy) ethanol	PTE (ton/year) Free Formaldehyde	PTE (ton/year) Hexyl Cellosolve	
<b>Inside Spray - ISM-5</b>										
Kansai / SC-3427B	8.51	0.000415	43200.00	0.00%	0.00%	2.28%	0.00	0.00	15.24	
							Total Single HAP	0.00	0.00	15.24
							Total HAP	15.24		
<b>Overvarnish - PTR-5</b>										
ICI Paints / 646C250	8.78	0.000162	43200.00	5.81%	0.01%	0.00%	15.64	0.03	0.00	
							Total Single HAP	15.64	0.03	0.00
							Total HAP	15.67		

**Controlled Emissions**

Emission Unit	Material	Uncontrolled Emissions			Overall Control Efficiency	Controlled Emissions		
		PTE (ton/year) 2-(2-butoxyethoxy) ethanol	PTE (ton/year) Free Formaldehyde	PTE (ton/year) Hexyl Cellosolve		PTE (ton/year) 2-(2-butoxyethoxy) ethanol	PTE (ton/year) Free Formaldehyde	PTE (ton/year) Hexyl Cellosolve
Inside Spray ISM-5	Kansai / SC-3427B	0.00	0.00	15.24	76.0%	0.00	0.00	3.66
Overvarnish PTR-5	ICI Paints / 646C250	15.64	0.03	0.00	76.0%	3.75	0.01	0.00

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
 Controlled HAP emission rate (ton/yr) = Uncontrolled HAP emission rate (ton/yr) \* (1 - Overall Control Efficiency)

**Appendix A: Emissions Calculations  
Printing Operations - VOC and HAP**

**Company Name: Ball Metal Beverage Container Corp.  
Address City IN Zip: 501 North Sixth Street, Monticello, IN 47960  
Permit Number: MSM 181-26874-00022 and SPM 181-26916-00022  
Plt ID: 181-00022  
Reviewer: David J. Matousek  
Date: September 9, 2008**

**Uncontrolled Emissions**

Ink Name Press ID	Container Size	Max Line Speed (cans per hour)	Dry Coating Weight (lb dry film/can)	VOC Content (lb VOC/lb Ink)	Wet Coating Weight (lb Ink/can)	Flash Off %	Maximum Ink Usage (lb ink/hr)	PTE VOC (lb/hr)	PTE VOC (tons/yr)	Formaldehyde Content (lb formaldehyde / lb ink)	PTE Formaldehyde (tons/yr)
PTR-5	Variable	43,200	0.000186	0.16	0.0002211	100%	9.55	1.52	6.65	0.000082	0.0034
Total Unlimited PTE New Units											

**Controlled Emissions**

Emission Unit	Uncontrolled PTE (ton/yr)	Overall Control Efficiency	Controlled PTE (ton/yr)
PTR-5 VOC Emissions	6.65	76.0%	1.5957
PTR-5 Formaldehyde Emissions	0.0034	76.0%	0.0008

**Methodology**

- 1) All cans can be bottom coated with an inking system or a UV bottom coater. Emissions for the inking system provide the worst case emissions.
- 2) The line speed and the amount of coating applied varies. The line speed increases as the amount of coating applied decreases. The applicant provided worst case emissions based on a line speed of 43,200 cans an hour.
- 3) The applicant provided the pounds of solids applied per can, the coating density, the pounds of coating applied per day and the pound of VOC per pound of coating.
- 4) Wet coating weight (pounds of ink per can) = Dry coating weight (pounds dry film/can) / (1-VOC Content)
- 5) PTE VOC (lb/hr) = VOC content (lb VOC / lb ink) \* Flash Off % \* Maximum Ink Usage (lb ink/hr)
- 6) PTE VOC (tons/year) = PTE VOC (lb/hr) \* 8760 hr/yr \* 1 lb / 2000 lb
- 7) PTE Formaldehyde (ton/year) = Formaldehyde Content (lb Formaldehyde/lb Ink) \* Maximum Ink Usage (lb in/hr) \* 8760 hr/yr \* 1 ton / 2000 lb

**Appendix A: Emissions Calculations  
Natural Gas Combustion - Washer Dry Off Oven WO-L5**

**Company Name:** Ball Metal Beverage Container Corp.  
**Address City IN Zip:** 501 North Sixth Street, Monticello, Indiana 47960  
**Permit Number:** MSM 181-26874-00022 and SPM 181-26916-00022  
**Plt ID:** 181-00022  
**Reviewer:** David J. Matousek  
**Date:** September 9, 2008

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

10.0

87.60

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	28.5	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.08	0.33	1.25	4.38	0.24	3.68

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only - Washer Dry Off Oven WO-L5**

**HAPs Emissions**

**Company Name:** Ball Metal Beverage Container Corp.  
**Address City IN Zip:** 501 North Sixth Street, Monticello, Indiana 47960  
**Permit Number:** MSM 181-26874-00022 and SPM 181-26916-00022  
**Pit ID:** 181-00022  
**Reviewer:** David J. Matousek  
**Date:** September 9, 2008

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

Methodology is the same as page 1.

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



**Appendix A: Emissions Calculations  
Natural Gas Combustion - Printer Oven PO-5**

**Company Name:** Ball Metal Beverage Container Corp.  
**Address City IN Zip:** 501 North Sixth Street, Monticello, Indiana 47960  
**Permit Number:** MSM 181-26874-00022 and SPM 181-26916-00022  
**Plt ID:** 181-00022  
**Reviewer:** David J. Matousek  
**Date:** August 27, 2008

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

10.0

87.60

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	28.5	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.08	0.33	1.25	4.38	0.24	3.68

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only - Printer Oven PO-5**

**HAPs Emissions**

**Company Name:** Ball Metal Beverage Container Corp.  
**Address City IN Zip:** 501 North Sixth Street, Monticello, Indiana 47960  
**Permit Number:** MSM 181-26874-00022 and SPM 181-26916-00022  
**Pit ID:** 181-00022  
**Reviewer:** David J. Matousek  
**Date:** September 9, 2008

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

Methodology is the same as page 1.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion - Inside Spray Oven ISO-5**

**Company Name:** Ball Metal Beverage Container Corp.  
**Address City IN Zip:** 501 North Sixth Street, Monticello, Indiana 47960  
**Permit Number:** MSM 181-26874-00022 and SPM 181-26916-00022  
**Plt ID:** 181-00022  
**Reviewer:** David J. Matousek  
**Date:** September 9, 2008

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.4

21.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	28.5	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.02	0.08	0.30	1.05	0.06	0.88

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only - Inside Spray Oven ISO-5**

**HAPs Emissions**

**Company Name:** Ball Metal Beverage Container Corp.  
**Address City IN Zip:** 501 North Sixth Street, Monticello, Indiana 47960  
**Permit Number:** MSM 181-26874-00022 and SPM 181-26916-00022  
**Pit ID:** 181-00022  
**Reviewer:** David J. Matousek  
**Date:** September 9, 2008

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.207E-05	1.261E-05	7.883E-04	1.892E-02	3.573E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.255E-06	1.156E-05	1.471E-05	3.994E-06	2.207E-05

Methodology is the same as page 1.

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