

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

| Permit Type: | Air State Facility |
|--------------|--------------------|
| Permit ID: | 7-4928-00064/00001 |

Mod 0 Effective Date: 12/28/2015 Expiration Date: 12/27/2025

Mod 1 Effective Date: 11/07/2019 Expiration Date: 12/27/2025

Permit Issued To:CROWN CORK & SEAL USA INC

770 Township Line Rd Ste 100

Yardley, PA 19067

Contact: Michael A Antry

CROWN CORK & SEAL COMPANY INC

ONE CROWN WAY PHILADELPHIA, PA 19154

(215) 698-5308

Facility: CROWN CORK & SEAL COMPANY INC

650 BERRY RD NICHOLS, NY 13812

Description:

Permit Administrator:

This permit modification will authorize the installation and operation of Line 3.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

JOSEPH M DLUGOLENSKI

| | 1285 FISHER AVE | | | | |
|-----------------------|-------------------------|-----------|---|----|--|
| | CORTLAND, NY 13045-1090 | | | | |
| | | | | | |
| Authorized Signature: | | _ Date: _ | / | _/ | |



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 4 1 Facility Inspection by the Department
- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 4 4 Applications for permit renewals, modifications and transfers

Facility Level

5 6 Submission of application for permit modification or renewal-REGION 7 SUBOFFICE - CORTLAND



DEC GENERAL CONDITIONS **** General Provisions **** GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a renewal application at least 180 days before expiration of permits for both Title V and State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 1-1: Applications for permit renewals, modifications and transfers Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or

Division of Air Resources



Facility DEC ID: 7492800064

supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item1-1.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 1-1.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal-REGION 7
SUBOFFICE - CORTLAND
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator Region 7 Sub-office Division of Environmental Permits 1285 Fisher Avenue Cortland, NY 13045-1090 (607) 753-3095



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:CROWN CORK & SEAL USA INC 770 Township Line Rd Ste 100 Yardley, PA 19067

Facility: CROWN CORK & SEAL COMPANY INC

650 BERRY RD NICHOLS, NY 13812

Authorized Activity By Standard Industrial Classification Code:

3411 - METAL CANS

Mod 0 Permit Effective Date: 12/28/2015 Permit Expiration Date: 12/27/2025

Mod 1 Permit Effective Date: 11/07/2019 Permit Expiration Date: 12/27/2025



PAGE LOCATION OF CONDITIONS

| PAGE | |
|-------------|--|
| | FEDERALLY ENFORCEABLE CONDITIONS |
| | Facility Level |
| 7 | 21 6 NYCRR 211.2: Visible Emissions Limited |
| 7 | 5 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration |
| 8 | 6 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions |
| 9 | 7 6 NYCRR 228-1.3 (d): Compliance Demonstration |
| 10 | 1-1 6 NYCRR 228-1.4 (d): Compliance Demonstration |
| 11 | 1-2 6 NYCRR 228-1.5: Compliance Demonstration |
| 12 | 1-3 6 NYCRR 231-5.3: Compliance Demonstration |
| 13 14 | 1-4 6 NYCRR 231-5.3: Compliance Demonstration |
| 15 | 1-5 6 NYCRR 231-5.3: Compliance Demonstration9 40CFR 60.7, NSPS Subpart A: Compliance Demonstration |
| 16 | 1-6 40CFR 60.492, NSPS Subpart WW: Compliance Demonstration |
| 17 | 1-7 40CFR 60.493(b)(2), NSPS Subpart WW: Compliance Demonstration |
| 18 | 1-8 40CFR 60.495, NSPS Subpart WW: Compliance Demonstration |
| 20 | 1-9 40 CFR Part 64: Compliance Demonstration |
| 20 | Emission Unit Level |
| | |
| | EU=U-PA001 |
| 21 | 12 6 NYCRR 202-1.1: Compliance Demonstration |
| | FU_U DAGGI Duca_DI 1 FC_DTGG1 |
| 21 | EU=U-PA001,Proc=PL1,ES=RT001 13 6 NYCRR 212-1.7 (b): Compliance Demonstration |
| 21 | 13 0 N I CKR 212-1.7 (b). Compliance Demonstration |
| | EU=U-PA001,EP=RT001 |
| 22 | 14 6 NYCRR 212-2.4 (b): Compliance Demonstration |
| 23 | 15 6 NYCRR 228-1.3 (a): Compliance Demonstration |
| | |
| | STATE ONLY ENFORCEABLE CONDITIONS |
| 2.6 | Facility Level |
| 26 | 16 ECL 19-0301: Contaminant List |
| 27 | 17 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities |
| 27 28 | 18 6 NYCRR Subpart 201-5: Emission Unit Definition 19 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits |
| 28 | 20 6 NYCRR 201-5.3 (c): Compliance Demonstration |
| 28 | 3 6 NYCRR 211.1: Air pollution prohibited |
| 29 | 1-10 6 NYCRR 212-2.1 (a): Compliance Demonstration |
| 2) | Emission Unit Level |
| 30 | 22 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit |
| 30 | 23 6 NYCRR Subpart 201-5: Process Definition By Emission Unit |
| | EU=U-PA001,EP=RT001 |
| 21 | 24 (NIVCRR 212 2 2 (b)). Compliance Demonstration |
| 31 | 24 6 NYCRR 212-2.3 (b): Compliance Demonstration |



FEDERALLY ENFORCEABLE CONDITIONS

Mod 1/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS The following conditions are federally enforceable.

Condition 21: Visible Emissions Limited
Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 211.2

Item 21.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 5: Compliance Demonstration

Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

- 1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
- 2. Purchase, usage and/or production records of each



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

coating material, including solvents.

- 3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
- 4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
- 5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Surface Coating- Prohibitions

Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (c)

Item 6.1:

- (1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:
- (i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;
- (ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and
- (iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).
- (2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.



Condition 7: Compliance Demonstration

Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 72.

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are

used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC

solvents to be used for surface preparation, cleanup or coating removal;

- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection

procedures require operational access. This provision does not apply

to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface

coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and

VOC solvents; and

- (g) clean hand held spray guns by one of the following:
- (1) an enclosed spray gun cleaning system that is kept closed when

not in use;

- (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (3) disassembling and cleaning of the spray gun in a vat



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

that is kept closed when not in use; or (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-1: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 228-1.4 (d)

Replaces Condition(s) 8

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

This condition is applicable if Crown chooses to comply with Oart 228 using complying coatings.

- (1) A facility performing a class D coating process shall not operate unless the following strategies to control VOC emissions are used.
- (2) The facility applying coatings to metal cans, may not use coatings with VOC contents, as applied, which exceed the limits specified in table D-1. The units in table D-1 are in terms of pounds of VOC per gallon of coating (minus water and excluded compounds) at application.

Table D-1 Metal Can Coating Lines

Two-piece can exterior (basecoat and over-varnish): 2.8 lb VOC/gal coating



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

Two-and three-piece can interior body spray: 4.2 lb VOC/gal coating

Two-piece can exterior end (spray or roll coat): 4.2 lb VOC/gal coating

In the annual certification, the owner or operator shall state whether he or she is demonstrating compliance using low VOC coatings, and if so, whether he or she has complied with this condition.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-2: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 228-1.5

Item 1-2.1:

The Compliance Demonstration activity will be performed for the facility: The Compliance Demonstration applies to:

Emission Unit: U-PA001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

- 1. The use of coatings that exceed the VOC content limits (as applied) specified in 6 NYCRR 228-1.4 is prohibitied unless control equipment is installed and operated. This condition is only applicable if non-228-1.4 compliant coatings are used.
- 2. Each VOC incinerator used as control equipment must be designed and operated to provide, at a minimum, a 90 percent overall removal efficiency.
- 3. Emissions testing must be conducted in accordance with a protocol approved by the Department and 6 NYCRR 202-1. Testing shall be conducted once a permit term and at any other time when requested by the Department.



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

4. A final test report shall be submitted to the Department no later than 60 days after completing the test.

Parameter Monitored: VOC

Upper Permit Limit: 90 percent reduction by weight

Reference Test Method: EPA Method 25a and 323 or Department approved Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-3: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 231-5.3

Item 1-3.1:

The Compliance Demonstration activity will be performed for the facility: The Compliance Demonstration applies to:

Emission Unit: U-PA001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

- 1. Emissions of VOC from the inside spray operation and the captured VOC emissions from the decorators (which equal the VOC emissions from the RTOs) shall not exceed 13.1 pounder per hour. Compliance will be based on stack emissions testing conducted in accordance with a protocol approved by the Department and 6 NYCRR 202-1. The averaging period shall be three test runs.
- 2. Initial testing shall be conducted no later than 180 days after startup. Thereafter, testing shall be conducted once a permit term.
- 3. A report of such emissions shall be submitted no later than 60 days after conducting such tests, as directed in 6 NYCRR 202-1.
- 4. RTO operating temperatures shall be recorded as directed elsewhere in this permit.

Parameter Monitored: VOC



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

Upper Permit Limit: 13.1 pounds per hour

Reference Test Method: EPA Methods 25a and 323 or Department approved Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-4: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 231-5.3

Item 1-4.1:

The Compliance Demonstration activity will be performed for the facility: The Compliance Demonstration applies to:

Emission Unit: U-PA001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

- 1. Emissions of VOC from the pin ovens, lacquer spray machines and inside bake ovens shall achieve an overall capture and control efficiency of 98.5 percent on a mass basis. Compliance shall be determined in accordance with a protocol approved by the Department and 6 NYCRR 202-1. The averaging period shall be the average of three test runs.
- 2. VOC emissions from the decorator coaters shall be reduced by 78.8 percent (80 percent capture, 98.5 percent control). Compliance shall be determined in accordance with a protocol approved by the Department and 6 NYCRR 202-1. The averaging period shall be the average of three test runs.
- 3. Emissions from rim coating shall not exceed 0.10 pounds per gallon of coating applied, minus water and exempt solvents. The averaging period shall be instantaneous. Compliance shall be determined using coating formulation data.
- 4. The temperature in the oxidizer(s) must not fall more than 10 degrees below the temperature recorded during the most recent emissions test. The averaging period is 1 hour.



- 5. Pressure gauges must be installed and operated in any permanent total enclosure. Pressure differential between the inside of the enclosure and the outside of the enclosure must be measured and recorded. The differential must not fall below the differential recorded during the most recent stack test. The averaging period is one hour.
- 6. The facility must comply with solvent handling and storage as described in 6 NYCRR 228-1.3.
- 7. In the semi-annual report, the owner or operator must state whether he or she has performed the required monitoring. In the annual certification report, the owner or operator shall state whether he or she has complied with this requirement.

Parameter Monitored: VOC

Upper Permit Limit: 98.5 percent reduction by weight

Reference Test Method: EPA Methods 25a and 323 or Department Approved Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

Subsequent reports are due every 12 calendar month(s).

Condition 1-5: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 231-5.3

Item 1-5.1:

The Compliance Demonstration activity will be performed for the facility: The Compliance Demonstration applies to:

Emission Unit: U-PA001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

1. The facility-wide potential to emit VOCs is 81.5 tons per year. The averaging time is each 12 consecutive



calendar month period.

- 2. Emissions shall be computed using published emission factors and site specific emission factors based on the most recent stack test results, looking forward.
- 3. Emissions of VOC shall be determined in accordance with a protocol approved by the Department and 6 NYCRR 202-1.
- 4. Capture efficiency shall be determined according to 40 CFR Part 51, Appendix Methods 204 through 204E.
- 5. On an annual basis, the owner or operator shall, in his or her annual report, state whether he or she has complied with this condition.

Parameter Monitored: VOC

Upper Permit Limit: 81.5 tons per year

Reference Test Method: EPA promulgated methods or equivalent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

Subsequent reports are due every 12 calendar month(s).

Condition 9: Compliance Demonstration Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 40CFR 60.7, NSPS Subpart A

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Notification and record keeping.

- (a) Any owner or operator subject to the provisions of this part shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows:
- (1) A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days



after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.

- (2) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
- (3) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
- (b) Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-6: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement: 40CFR 60.492, NSPS Subpart WW

Item 1-6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

that exceed the following volume-weighted calendar-month average emissions:

- (1) 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
- (2) 0.89 kilogram of VOC per litre of coating solids from each two-piece can inside spray coating operation.

The facility will comply with the above specified VOC limits through either the use of compliant coatings or using add-on emissions control. It is the responsibility of the facility to notify the department if they wish to employ any new coatings or use any of the control options specified under 40 CFR 60.493 to meet the above specified VOC content limits.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-7: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement:40CFR 60.493(b)(2), NSPS Subpart WW

Item 1-7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

This condition is only applicable if the owner or operator uses a capture and control system to comply with the coating emission limits under 40 CFR 60.492.

- 1. The owner or operator shall use the procedures in 40 CFR 60.493(b)(2) to demonstrate compliance with the coating emission limits on a calendar month volume-weighted basis.
- 2. A temperature measurement device shall be installed in the firebox. The device shall be installed, calibrated, and maintained according to the manufacturer's specifications. The device shall have an accuracy 0f 0.75 percent of the temperature being measured, expressed in degrees Celsius, or plus or minus 2.5 degrees C, whichever is greater.



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

3. Each temperature measurement device shall be equipped with a recording device so that a permanent continuous record is produced.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-8: Compliance Demonstration

Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement:40CFR 60.495, NSPS Subpart WW

Replaces Condition(s) 11

Item 1-8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

- (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, 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



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

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 Department 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 Department 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) Reserved.
- (3) If no such periods as described in paragraph (c)(1) of this condition 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

Subsequent reports are due every 3 calendar month(s).



Condition 1-9: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable Federal Requirement: 40 CFR Part 64

Item 1-9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The operation of this facility is subject to EPA's Compliance Assurance Monitoring rule. The provisions below (which are contained elsewhere in this permit) constitute CAM.

- 1. The temperature in the oxidizer(s) must not fall more than 10 degrees below the temperature recorded during the most recent emissions test. The averaging period is 1 hour. A device must be installed and maintained in the oxidation chamber to measure combustion temperature. Temperature must be recorded in a data aquisition and handling system.
- 2. The temperature measurement device must be calibrated on an annual basis.
- 3. Pressure gauges must be installed and operated in any permanent total enclosure. Pressure differential between the inside of the enclosure and the outside of the enclosure must be measured and recorded. The differential must not fall below the differential recorded during the most recent stack test. The averaging period is one hour.
- 4. On a quarterly basis, the owner or operator shall state whether he or she has complied with this requirement.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 10 degrees C below the approved performance test combustion

temperature

Monitoring Frequency: CONTINUOUS Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

Subsequent reports are due every 6 calendar month(s).



**** Emission Unit Level ****

Condition 12: Compliance Demonstration Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PA001

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

The facility must perform an initial stack test for VOC destruction efficiency for the RTO within 60 days after achieving maximum operating load but no later than 180 days after initial startup. The facility must also perform a separate emissions test for formaldehyde destruction efficiency within 60 days after achieving maximum operating load but no later than 180 days after initial startup. The facility must submit a emissions testing protocol for department approval no later than 30 days prior to testing which must include the test methods and procedures along with the appropriate facility operating parameters.

Upper Permit Limit: 99 percent reduction by weight Reference Test Method: Department Approved Methods

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 13: Compliance Demonstration Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 212-1.7 (b)

Item 13.1:

The Compliance Demonstration activity will be performed for:



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

Emission Unit: U-PA001

Process: PL1 Emission Source: RT001

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Facility owners and/or operators of any emission source equipped with either a thermal or catalytic oxidizer must install continuous monitors and data recorders for the exhaust gas temperature from thermal or catalytic oxidizer prior to start-up of a new or modified process emission source(s). Continuous monitors must be operated at all times when the associated emission control equipment is operating except during any quality assurance and routine maintenance activities. Each monitor must be operated according to a quality assurance program approved by the department. Alternative monitoring methods may be employed subject to department approval.

The facility must meet or exceed the temperature achieved during the most recent formaldehyde stack test in order to maintain compliance with the provisions of 6NYCRR 212-2.3(b) which requires 99% control of formaldehyde which is an "A" rated compound.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PA001 Emission Point: RT001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The control of particulate emissions released from new and modified process emission sources. Emissions from any

Air Pollution Control Permit Conditions
Mod 1/Active Page 21 FINAL



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon table 5 and table 6 of subdivisions 212-2.5(a) and (b) of this Subpart. Testing will be conducted upon Department request and emissions will be calculated as the result of three runs of 1-hour in duration each.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Reference Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 15: Compliance Demonstration Effective between the dates of 12/28/2015 and 12/27/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PA001 Emission Point: RT001

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from this emissions point, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emissions point to which this condition applies at the monitoring frequency stated below while the



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 228-1.3(a) are detected (this may be zero percent opacity for many or all emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Method 9

Monitoring Frequency: WEEKLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 16: Contaminant List

Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: ECL 19-0301

Item 16.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000050-00-0 Name: FORMALDEHYDE

CAS No: 0NY075-00-0 Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 17: Malfunctions and start-up/shutdown activities

Air Pollution Control Permit Conditions
Page 25 FINAL

Mod 1/Active



Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR 201-1.4

Item 17.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.
- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 18: Emission Unit Definition
Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 18.1(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-PA001 Emission Unit Description:

Production area for can manufacturing Lines 1 and 2



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

including all associated equipment from both lines including: decorating machines, inside spray machines, and curing ovens, all which are vented through a regenerative thermal oxidizer (RTO) before exhausting to the atmosphere.

Building(s): Production

Condition 19: Renewal deadlines for state facility permits
Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR 201-5.2 (c)

Item 19.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 20: Compliance Demonstration
Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR 201-5.3 (c)

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources NYS Dept. of Environmental Conservation Region 7 615 Erie Blvd West Syracuse, NY 13204

Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2016. Subsequent reports are due every 12 calendar month(s).

Condition 3: Air pollution prohibited
Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR 211.1

Air Pollution Control Permit Conditions
Page 27 FINAL



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

Item 3.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 1-10: Compliance Demonstration Effective between the dates of 11/07/2019 and 12/27/2025

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 1-10.1:

The Compliance Demonstration activity will be performed for the facility: The Compliance Demonstration applies to:

Emission Unit: U-PA001

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

- 1. The only high toxicity air contaminant emitted in excess of the mass emission limit of 6 NYCRR 212-2.2, Table 2 is formaldehyde.
- 2. Emissions of formaldehyde must be reduced, on a mass basis, by 99 percent, averaged over three test runs. Compliance shall be determined using stack testing in accordance with a protocol approved by the Department and 6 NYCRR 202-1. Emissions testing for formaldehyde must be conducted not later than 180 days after receipt of this permit modification.
- 3. Predicted ambient impacts of formaldehyde must not exceed 0.06 ug/m3 on an annual basis and must not exceed 30 ug/m3 on a 1-hour basis.
- 4. In the annual certification, the owner or operator shall indicate whether he or she has complied with this condition.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 99 percent reduction by weight Reference Test Method: EPA 323 or Department approved



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: Arithmetic average of stack test runs Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

Subsequent reports are due every 12 calendar month(s).

**** Emission Unit Level ****

Condition 22: Emission Point Definition By Emission Unit Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 22.1(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-PA001

Emission Point: RT001

Height (ft.): 60 Diameter (in.): 90 NYTMN (km.): 4656.771 NYTME (km.): 390.831

Condition 23: Process Definition By Emission Unit Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 23.1(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-PA001

Process: PL1 Source Classification Code: 4-02-008-40

Process Description: Line 1

Emission Source/Control: BH001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: RT001 - Control Control Type: THERMAL OXIDATION

Emission Source/Control: DC001 - Process

Design Capacity: 1,800 number (or quantity) per minute

Emission Source/Control: DC002 - Process

Design Capacity: 1,800 number (or quantity) per minute

Emission Source/Control: DC003 - Process

Design Capacity: 1,800 number (or quantity) per minute

Mod 1/Active Page 29



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064

Emission Source/Control: DC004 - Process

Design Capacity: 1,800 number (or quantity) per minute

Emission Source/Control: SM001 - Process

Design Capacity: 2,450 number (or quantity) per minute

Emission Source/Control: SM002 - Process

Design Capacity: 2,450 number (or quantity) per minute

Emission Source/Control: SM003 - Process

Design Capacity: 2,450 number (or quantity) per minute

Emission Source/Control: SM004 - Process

Design Capacity: 2,450 number (or quantity) per minute

Condition 24: Compliance Demonstration Effective between the dates of 12/28/2015 and 12/27/2025

Applicable State Requirement: 6 NYCRR 212-2.3 (b)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PA001 Emission Point: RT001

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

A process emission source emitting an air contaminant and having an emission rate potential (ERP) of greater than 1.0 pound per hour and an Environmental Rating of A must demonstrate a minimum of 99% control on the emission source/emission point.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Permit ID: 7-4928-00064/00001 Facility DEC ID: 7492800064