



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

Facility Identification Data

Name: METAL CONTAINER CORP

Address: 130 BRUENIG RD

NEW WINDSOR, NY 12553

Owner/Firm

Name: METAL CONTAINER CORP

Address: ONE BUSCH PLACE

SAINT LOUIS, MO 63118, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: THOMAS M MILLER

Address: NYSDEC - REGION 3

21 S PUTT CORNERS RD

NEW PALTZ, NY 12561-1696

Phone:8452563149

Division of Air Resources:

Name: THOMAS M MILLER

Address: NYSDEC - REGION 3

21 S PUTT CORNERS RD

NEW PALTZ, NY 12561-1696

Phone:8452563149

Air Permitting Facility Owner Contact:

Name: CHASE SHUMATE

Address: METAL CONTAINER CORPORATION

130 BRUENIG RD

NEW WINDSOR, NY 12553

Phone:8455675640

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

Application for a Title V permit Renewal that incorporates a conversion of line 3 from producing 12 ounce cans only to producing both 12 ounce and 16 ounce cans interchangeably. Part 231 VOC LAER applies to this conversion as well as ERC offsets for the amount of PEP.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

Attainment Status

METAL CONTAINER CORP is located in the town of NEW WINDSOR in the county of ORANGE. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MODERATE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The Metal Container Corporation is located in the Town of New Windsor, Orange County, New York. The facility manufactures two piece aluminum beverage cans. The emissions are from the cutting and forming of the can bodies and the coating and decorating operations. Primary emissions associated with facility operations are Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), Carbon Monoxide (CO) and Oxides of Nitrogen (NOx). The NOx and CO emissions are from the thermal oxidizer and heating sources. The thermal oxidizer functions as a control of VOCs and HAPs generated as result of aluminum can coating and decorating operations.

The Frontend Operations (Emission Unit U-1000) includes the formation of the can body. Emissions are from the cutting oils and cleaners from the cupper, bodymaker and washer. Emissions are controlled by munter oil mist and cyclone units.

The Backend Operations (Emission Unit U-2000) includes the coating and decorating of the formed can bodies. Emissions from the curing ovens are VOC's, and HAP's which are routed and controlled by the natural gas fired thermal oxidizer.

Facility wide natural usage is capped at 547.5 million cubic feet per year limiting NOx emissions to less than 40 tons per year. This cap was established under the original 2001 permit and remains in effect.

Total VOC emissions from the backend operations are limited to less than 326 tons per year (tpy). This limit was established to support the creation of emission reduction credits under a permit issued in 2012. This limit remains in effect.

Total VOC emissions from the Big Can Line (25.5 ounce) are limited to 115 tpy. This limit as well as a number of monitoring, recordkeeping and reporting requirements were established under a permit issued in 2012 reflecting a non-attainment new source review determination (Part 231). These requirements remain in effect.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

Because the facility is not a major source of HAPs, 40 CFR 63-KKKK does not apply.

This permit renewal also incorporates a conversion project of can line 3 from producing 12 ounce cans exclusively to producing both 12 ounce and 16 ounce cans interchangeably. This conversion results in a project VOC emission potential of 59.0 tpy. In accordance with the requirements of 6NYCRR Subpart 231-6, the line 3 conversion is subject to nonattainment new source review (NNSR) for VOC. Based on the applicability of NNSR, the facility is required to offset the project with 67.85 tpy VOC emission reduction credits (ERCs). The source of these ERCs is the Metal Container Corp. The permit contains numerous monitoring, recordkeeping and reporting requirements conditions under 6NYCRR Subpart 231 which reflect a NNSR evaluation relative to the operation of the line 3 conversion.

The facility's potential air emissions for VOC's and CO exceed the major source pollutant thresholds in 6NYCRR Subpart 201-6. Therefore, the facility is subject to the provisions of Title V. The Standard Industrial Classification Code for this facility is 3411 - Metal Cans and Shipping Containers.

Permit Structure and Description of Operations

The Title V permit for METAL CONTAINER CORP

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

METAL CONTAINER CORP is defined by the following emission unit(s):

Emission unit U10000 - Front end beverage can manufacturing operations include the cupper process, bodymakers, and washers.

Emission unit U10000 is associated with the following emission points (EP):
EP030, EP066, EP067, EP075, EP078, EP082, EP084, EP086, EP088, EP100, EP102



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

Process: P11 is located at Building B1 - The cupper process consists of four cupper machines that stamp aluminum cups from coils of aluminum. Circular pieces are cut from the aluminum coils and pressed into shallow cups. Lubrication oil present on the aluminum scrap from the coppers is collected by the scrap cyclone. The scrap cyclone is the only emission point and emission source for this process. Emissions from this process are limited to particulate emissions (oil mist). An emission factor of 1 pound of oil mist emitted per ton of aluminum scrap processed is used to calculate emissions for this process. The cyclone efficiency is conservatively estimated to be 85%.

Process: P12 is located at Building B1 - There are four bodymaker/trimmer lines. Cups are conveyed to the bodymakers where they are drawn into can bodies and trimmed to the proper height. The can bodies are then conveyed by elevators to the washers. Four munters-style oil mist eliminators are used to control oil mist from the can bodymakers and trimmers on each can line. Four cyclones are used to control oil mist from the wet can elevators. Emissions from these sources are particulates in the form of lubricant aerosol from the bodymakers and wet can elevators. The lubricant aerosol water content is 95.0%. The munters-style units and oil mist eliminators control efficiencies are 99% based on manufacturer's specifications.

Process: P13 is located at Building B1 - Can bodies are transported by elevators from the bodymakers/trimmers (P12) to the washers. The cans are washed in a six-stage process. The stages include rinsing with sulfuric acid solution, surface preparation (etching) with hydrofluoric acid solution, and several rinsing with water and deionized water. The cans are then dried in a natural gas-fired oven. The washed cans are then routed to either the basecoaters or decorators depending on the product type. Emissions associated with this process are insignificant and consist solely of water vapor containing negligible quantities of sulfuric acid and hydrofluoric acid. The washer oven is exempt per 6 NYCRR 201-3.2(c)(1).

Emission unit U20000 - The backend beverage can manufacturing consists of four coating lines which apply basecoat, decorating system, and inside spray. Support operations associated with this emission unit include four bulk storage tanks of basecoat, varnish and inside spray; solvent cleanup and ink dot id system; and a thermal oxidizer. The facility utilizes coating solutions that contain VOC below the limits specified by 6NYCRR Part 228 and 40 CFR 60 Subpart WW. The thermal oxidizer was initially installed to obtain additional control of VOCs and HAPs. Operation of the thermal oxidizer has been redefined in support of certifying ERCs and in support of project Big Can nonattainment new source review under permit Renwal 2 Modification 1.

Emission unit U20000 is associated with the following emission points (EP):

EP003, EP004, EP005, EP032, EP033, EP034, EP035, EP037, EP049, EP059, EP060, EP061, EP062, EP069, EP070, EP071, EP079, EP080, EP106, EP108, EP110, EP112, EP114, EP117, EP120, EP121, EP142, EP143, EP999

Process: 124 is located at Building B1 - This process identifies with the backend manufacturing lines 1, 2 and 3.

A portion of cans produced on lines 1, 2 and line 3 are conveyed from the can washer to the basecoaters. Basecoating is conducted on line 2. The basecoating operation consists of the application of white water-based basecoat on the can body exteriors with subsequent curing in a natural gas-fired oven. Each basecoat line consists of a day tank (a local reservoir for basecoat), applicator and curing oven (line 2 has two applicators and two curing ovens). Emissions from the hot zone of each curing oven are routed to the thermal oxidizer. The basecoated cans are then routed to the decorators. This process is also supported by a 10,000 gallon bulk storage tank. Mass balances are used for calculations of emissions from this process and include all materials used. Therefore, in order to prevent double counting of emissions, VOC emissions



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

are not reported for individual storage tanks.

Cans are conveyed either directly from the washers or the basecoat process to the decorators. Each decorator also has a day tank which is used as a local reservoir for varnish. The can exteriors are printed with high solids inks and then roll-coated with a water-based overvarnish before being cured in natural gas-fired ovens. Emissions from the hot zone of each curing oven are routed to the thermal oxidizer. This process is also supported by a 10,000 gallon bulk storage tanks. Mass balances are used for calculations of emissions from this process and include all materials used. Therefore, in order to prevent double counting of emissions, VOC emissions are not reported for individual storage tanks.

Cans are conveyed from the decorators to the inside spray process. Lines 1, 2 and 3 are equipped with inside spray lines, each consisting of a bank of inside spray machines and a natural gas-fired curing oven. There is also a respray machine which is used for respraying cans which do not pass a quality control checkpoint. The can interiors are sprayed with a water-based inside spray material and then cured in a natural gas-fired oven. Emissions from the hot zone of each curing oven are routed to the thermal oxidizer. This process is also supported by two bulk storage tanks with capacities of 10,000 and 3,400 gallons. Mass balances are used for calculations of emissions from this process and include all materials used. Therefore, in order to prevent double counting of emissions, VOC emissions are not reported for individual storage tanks.

Miscellaneous processes associated with the backend (surface coating operations) of the can manufacturing facility are solvent cleanup and can quality control labeling with the ink dot ID system. Solvent is used for cleaning of the coating applicators and associated equipment. Solvent usage and emissions from parts cleaning are also included with this process although the parts-washers are considered exempt per 6 NYCRR 201-3.2(c)(39)(ii) and (iii). Emissions from the ink dot ID system are insignificant based on 6 NYCRR 201-6.3(d)(7).

Process: PBC is located at Building B1 - This process identifies with the 25.5 ounce big can backend manufacturing.

The UV bottom coat (UVBC) is a process unique to the big can line. This process is located between the can washer and the basecoater. The process consists of a coating application on the bottom rim of the cans and then curing the coating with ultraviolet light. The coating used in the UVBC is a very high solids (99.8%) coating that is cured by UV light. There is no combustion associated with this process. Emissions from the UVBC process are insignificant based on 6 NYCRR 201-6.3(d)(7). The ultraviolet curing process is exempt per 6 NYCRR 201-3.2(c)(19) and has been included in the list of exempt activities.

A portion of big cans are conveyed from the can washer or UVBC to the basecoaters. Only a portion of the big cans produced at this facility are basecoated (cans that are not basecoated are routed directly to the decorators). The basecoating operation consists of the application of white water-based basecoat on the can body exteriors with subsequent curing in a natural gas-fired oven. Each basecoat line consists of a day tank (a local reservoir for basecoat), applicator and curing oven. Emissions from the hot zone of the curing oven are routed to the thermal oxidizer. The basecoated cans are then routed to the decorators. This process is also supported by a 10,000 gallon bulk storage tank. Mass balances are used for calculations of emissions from this process and include all materials used. Therefore, in order to prevent double counting of emissions, VOC emissions are not reported for individual storage tanks.

Cans are conveyed either directly from the washers, UVBC process or the basecoat process to the decorators. The decorator has a day tank which is used as a local reservoir for varnish. The can exteriors natural gas-fired ovens. Emissions from the hot zone of each curing oven are routed to the thermal oxidizer. This process is also supported by a 10,000 gallon bulk storage tanks. Mass balances are used for



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

calculations of emissions from this process and include all materials used. Therefore, in order to prevent double counting of emissions, VOC emissions are not reported for individual storage tanks.

Cans are conveyed from the decorators to the inside spray process. There is one inside spray lines consisting of a bank of inside spray machines and a natural gas-fired curing oven. The can interiors are sprayed with a water-based inside spray material and then cured in a natural gas-fired oven. Emissions from the curing oven hot zone are routed to the thermal oxidizer. This process is also supported by two bulk storage tanks with capacities of 10,000 and 3,400 gallons. Mass balances are used for calculations of emissions from this process and include all materials used. Therefore, in order to prevent double counting of emissions, VOC emissions are not reported for individual storage tanks.

Miscellaneous processes associated with the backend (surface coating operations) of the can manufacturing facility are solvent cleanup and can quality control labeling with the ink dot ID system. Solvent is used for cleaning of the coating applicators and associated equipment. Solvent usage and emissions from parts cleaning are also included with this process although the parts-washers are considered exempt per 6 NYCRR 201-3.2(c)(39)(ii) and (iii). Emissions from the ink dot ID system are insignificant based on 6 NYCRR 201-6.3(d)(7).

Emission unit U30000 - Operation of two boilers firing natural gas.

Emission unit U30000 is associated with the following emission points (EP):

BLR01, BLR02

Process: GAS Boilers firing natural gas.

Title V/Major Source Status

METAL CONTAINER CORP is subject to Title V requirements. This determination is based on the following information:

Facility is a major source of VOC and CO emissions.

Program Applicability

The following chart summarizes the applicability of METAL CONTAINER CORP with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

SIP	YES
-----	-----

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3411	METAL CANS

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-09-001-99	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - GENERAL PROCESSES Other Not Classified
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
3-99-999-96	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
4-02-017-21	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - METAL CAN COATING TWO PIECE EXTERIOR BASE COATING

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

a federally enforceable emissions cap or limitation for that contaminant. The term ‘HAP’ refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
007664-41-7	AMMONIA	750			
000124-38-9	CARBON DIOXIDE	30000000			
000630-08-0	CARBON MONOXIDE	20000			
000100-41-4	ETHYLBENZENE	150			
000050-00-0	FORMALDEHYDE	5400			
007664-39-3	HYDROGEN FLUORIDE	130			
000067-56-1	METHYL ALCOHOL	30			
0NY090-00-0	OIL MIST	2600			
0NY210-00-0	OXIDES OF NITROGEN	76600			
0NY075-00-0	PARTICULATES	11000			
007446-09-5	SULFUR DIOXIDE	150			
007664-93-9	SULFURIC ACID	800			
0NY100-00-0	TOTAL HAP	49800			
0NY998-00-0	VOC	652000			
001330-20-7	XYLENE, M, O & P MIXT.	10600			

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

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 Title V Facilities - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V 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.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. 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.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

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

Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

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

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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 3-3348-00084/00131
 Renewal Number: 3
 10/24/2016

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	53	Powers and Duties of the Department with respect to air pollution control
U-20000	40CFR 60-WW.493(b)	38	Beverage Can Surface Coating - performance test and compliance provisions
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10, 21	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	54	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 23, 34, 35	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	24	Compliance Schedules - Progress Reports



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7	25	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	27	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	55	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.6(a)	28	Limiting of Opacity
FACILITY	6NYCRR 212-2.3(b)	56	Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 212-2.4(b)	29	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 227-1.3(a)	30	Smoke Emission Limitations.
FACILITY	6NYCRR 228-1.3(a)	31	Surface Coating General Requirements- Opacity
U-20000	6NYCRR 228-1.3(d)	36	Surface Coating General Requirements- Handling, storage and disposal
U-20000	6NYCRR 231-10.1	37	General provisions
FACILITY	6NYCRR 231-10.2	33	Determination of ERCs
U-20000	6NYCRR 231-6	37	Mods to Existing Major Facilities in Nonattainment and Attainment Areas of the State in the OTR
U-20000/-/PBC	6NYCRR 231-6	50	Mods to Existing Major Facilities in Nonattainment and Attainment Areas of the State in the OTR
U-20000/-/124	6NYCRR 231-6.5	39, 40, 41, 42, 43, 44	Lowest achievable emission rate, LAER
U-20000/-/PBC	6NYCRR 231-6.5	45, 46, 47, 48, 49, 50, 51	Lowest achievable emission rate, LAER
U-20000/EP999/PBC	6NYCRR 231-6.5	52	Lowest achievable emission rate, LAER
FACILITY	6NYCRR 231-6.6	32	Emission offset requirements

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.

40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, METAL CONTAINER CORP has been determined to be subject to the following regulations:

40 CFR 60.493 (b)

6 NYCRR 211.1

This regulation requires that 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.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

6 NYCRR 212-1.6 (a)

This provision requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.3 (b)

Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131
Renewal Number: 3
10/24/2016

6 NYCRR 231-10.1

This section contains the general provisions of this Subpart.

6 NYCRR 231-10.2

This section lists the requirements on determining if a reduction qualifies to be an ERC.

6 NYCRR 231-6.5

This section outlines what LAER is and how it is determined.

6 NYCRR 231-6.6

This section states what the emission offset requirements are for a facility subject to this Subpart.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6 NYCRR Subpart 231-6

This Subpart applies to modifications to existing major facilities in non-attainment areas and attainment areas of the State within the OTR.

Compliance Certification

Summary of monitoring activities at METAL CONTAINER CORP:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-20000	38	record keeping/maintenance procedures
FACILITY	21	monitoring of process or control device parameters as surrogate
FACILITY	23	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	56	intermittent emission testing
FACILITY	29	intermittent emission testing
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
U-20000	36	record keeping/maintenance procedures
U-20000	37	monitoring of process or control device parameters as surrogate
FACILITY	33	monitoring of process or control device parameters as surrogate
U-20000/-/124	39	work practice involving specific operations
U-20000/-/124	40	intermittent emission testing
U-20000/-/124	41	work practice involving specific operations
U-20000/-/124	42	work practice involving specific operations
U-20000/-/124	43	work practice involving specific operations
U-20000/-/124	44	work practice involving specific operations
U-20000/-/PBC	45	work practice involving specific operations
U-20000/-/PBC	46	work practice involving specific operations
U-20000/-/PBC	47	work practice involving specific operations
U-20000/-/PBC	48	work practice involving specific operations
U-20000/-/PBC	49	work practice involving specific operations
U-20000/-/PBC	50	monitoring of process or control device parameters as surrogate
U-20000/-/PBC	51	record keeping/maintenance procedures
U-20000/EP999/PBC	52	intermittent emission testing

Basis for Monitoring

Historical Ren 2 Mod 1 August 2012 - Installation of the Big Can line and certification of ERCs.

VOC Emission Reduction Credits (ERCs) were quantified as the baseline actual emissions minus the subsequent or future potential to emit (FPTE) as follows:

$$\text{VOC ERCs} = 521 \text{ tpy} - 326 \text{ tpy} = 195 \text{ tpy}$$

The baseline actual emissions were from average usage during 1997 and 1998. The FPTE conservatively used thermal oxidizer downtime of 10 % for maintenance and repair and conservatively uses the coating VOC RACT limit which is currently and historically greater than material actually used by the facility.

In support of certify the ERCs, the Ren 2 mod 1 limited emission unit U-2000 backend potential emissions to 326 tons VOC per year. In addition, the permit modification required operation of the thermal oxidizer as control in addition to utilizing RACT and NSPS compliant coatings.

Stack testing performed in 1999 was the basis for the minimum thermal oxidizer operating temperature of 1400 F.

Nonattainment New Source Review applied to project Big Can. Accordingly, A LAER evaluation was conducted which included a search in the RBLC. The search revealed two projects at similar can plant manufacturers. The LAER evaluation presented a comparative analysis and proposed similar restrictions as well as additional requirements unique to the Big Can project. In summary, LAER for the Big Can project is as follows:

Required operation of the Thermal Oxidizer (TO).



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

A 20% VOC limit on decorator inks.

Maximum VOC content for over-varnish, basecoat and interior body coatings limited to California South Coast District requirements.

Big Can overall VOC reduction a minimum of 60%. Performance testing required.

Big Can bottom coating UV curing.

Big Can TO downtime maximum 240 hrs/yr.

The Big Can annual VOC emissions are capped at 115 tpy. This is based on Part 231 worksheet 7 where PAE is 115 tpy.

Historical Ren 2 Mod 2 June 2015 - conversion of can line 1 and Big Can continuation.

Line 1 and 2 project emissions 86.10 tpy VOC

Line 1 and 2 baseline emissions 53.21 tpy VOC

NEI $86.10 \text{ tpy} - 53.21 \text{ tpy} = 32.89 \text{ tpy}$

The baseline emissions used are from the years 2013 and 2014. NNSR did not apply to this project since the emissions increase was less than the 40 tpy significant project threshold.

The Big Can reconfiguration was considered a continuation since the project was previously offset and LAER applies.

To account for usage rate increases, individual HAP emissions factors were revised. The facility remained a minor source of HAP emissions.

Ren 2 Mod 2 permit modification accounted for the conversion of can line 1 from exclusively producing 12 ounce cans to producing both 12 ounce and 16 ounce cans. This conversion required physical equipment changes to the manufacturing frontend bodymakers as well as re-designating equipment supporting backend coating operations. Producing 16 ounce cans replaced a portion of the 12 ounce can manufacturing capabilities resulting in a project VOC emission potential of 32.89 tons per year. Non-attainment new source review (NNSR) did not apply to this project.

Ren 2 Mod 2 also addressed the continuation of the Big Can project previously permitted as Renewal 2 Modification 1 (2012). The Big Can continuation represented a realignment of the manufacturing line speed resulting in a potential VOC emissions increase of 3.94 tons above the original 2012 review. Because the original 2012 Big Can project was subject NNSR, the facility was required to utilize 4.53 tons ($3.94 \times 1.15 = 4.53 \text{ tons}$) of VOC emission reduction credits to comply with 6NYCRR Part 231. Specific condition representing Lowest Achievable Emission Rate (LAER) remain in effect as previously permitted. The source of emission reduction credits was the Metal Container Corp.

Present Ren 3 – Title V renewal with a line 3 conversion project.

Line 3 conversion potential emissions 88.14 tpy VOC

Line 3 conversion baseline emissions 29.14 tpy VOC

PEP = $88.14 \text{ tpy} - 29.14 \text{ tpy} = 59.00 \text{ tpy}$

The baseline emissions used are from the years 2013 and 2014.

Nonattainment New Source Review applies to the line 3 conversion project. Accordingly, A LAER evaluation was conducted which included a search in the RBLC. LAER for the line 3 conversion project as follows:



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3348-00084/00131

Renewal Number: 3

10/24/2016

A 20% VOC limit on decorator inks for lines 1, 2 and 3 inclusive.
Maximum VOC content for over-varnish, basecoat and interior body coatings limited to California South Coast District requirements for lines 1, 2 and 3 inclusive.
Line 3 overall VOC capture efficiency at a minimum of 63%. Performance testing required.
TO downtime a maximum 240 hrs/yr for line 3.

VOC ERCs needed to offset the line 3 conversion PEP = $59.00 \text{ tpy} \times 1.15 = 67.85 \text{ tpy}$. The source of 67.85 tpy VOC emission reduction credits is the Metal Container Corp.

Part 212 evaluation of formaldehyde indicates an emission rate potential of some 5 lbs/hr requiring a Table 4 degree of air cleaning 99 % percent. Stack testing is required to verify the requirement. In the event the minimum limit is not met, a T-BACT must be submitted as a function of the permit renewal and may require a future permit modification.

The facility is subject to limited VOC content within applied coatings under 6NYCRR Part 228 and 40CFR Part 60 New Source Performance Standards. These limits are omitted from the permit because the limits specified under 6NYCRR Part 231 are more stringent.