

County of Forsyth



PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR QUALITY PERMIT

FORSYTH COUNTY
OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION
WINSTON-SALEM, NORTH CAROLINA

July 18, 2017

Notice is hereby given by the Forsyth County Office of Environmental Assistance and Protection (EAP) of an opportunity for the public to review and comment on a draft Title V air quality permit for:

**Ardagh Metal Beverage USA, Inc.
Winston-Salem, NC
Permit #00682-TV-17**

This facility had applied for a significant modification of its Title Air Quality operation permit and has requested a limitation to avoid the applicability of Major New Source Review preconstruction permitting. In addition to this modification, the public may comment on those sections of the permit identified in the statement of basis that are not covered under Forsyth County Air Quality Control Ordinance and Technical Code (FCAQTC) Rule 3Q .0512(a) Permit Shield. The draft permit meets the Title V requirements as specified in FCAQTC Section 3Q .0500.

EPA will process this draft permit as a proposed permit and perform its 45-day review provided by Rule 3Q .0522 *Review by EPA and Affected States* concurrently with the public notice period. If public comments are received that result in a change to the permit, EPA's 45-day review period will cease to be performed concurrently with the public notice period. The deadline for citizen's petitions to the EPA Administrator will be determined based on EPA's 45-day review period beginning after the public comment period has ended. The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address:

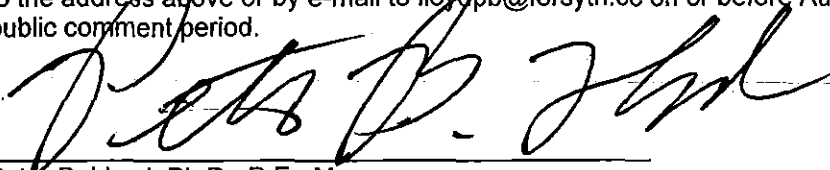
<https://www.epa.gov/caa-permitting/north-carolina-proposed-title-v-permits>

The EAP will issue a final Air Quality Permit, in accordance with the conditions of the draft/proposed Air Quality Permit, unless there are public comments which result in a different decision or significant change in the permit.

A copy of the draft permit and statement of basis is available at the EAP's website:

http://www.forsyth.cc/EAP/public_notices.aspx

Additional information regarding the draft permit may be obtained from the Office of Environmental Assistance and Protection, Forsyth County Government Center, 201 N. Chestnut Street, Winston-Salem, NC 27101-4120, telephone (336) 703-2440. The public may submit written comments on these proceedings to the address above or by e-mail to lloydpb@forsyth.cc on or before August 16, 2017, the close of the public comment period.


Peter B. Lloyd, Ph.D., P.E., Manager
Compliance Assistance & Permitting Division

OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION

FORSYTH COUNTY GOVERNMENT CENTER
201 N. CHESTNUT STREET
WINSTON-SALEM, N. C. 27101-4120

PERMIT TO CONSTRUCT/OPERATE
AIR QUALITY CONTROL
CLASS: TITLE V

PERMIT NUMBER	EFFECTIVE DATE	EXPIRATION DATE	RENEWAL DUE
00682-TV-17	DATE, 2017	November 14, 2017	February 14, 2017

Facility Name: Ardagh Metal Beverage USA, Inc.
Mailing Address: 8770 Bryn Mawr Avenue
City, State, Zip: Chicago, Illinois 60631-3504

Facility Location: 4000 Old Milwaukee Lane
City: Winston-Salem, NC

In accordance with the provisions set forth in the Forsyth County Air Quality Technical Code and Chapter 3 of the Forsyth County Code, Air Quality Control, the facility identified above is authorized to operate, as outlined in Part I, Air Quality Title V Operation Permit, and to construct and operate, as outlined in Part II, Air Quality Construction and Operation Permit, the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations contained within this permit. Additionally, any emissions activities determined from your air quality permit application as meeting the definition for insignificant activities contained in Rule 3Q .0503 have been listed for informational purposes as an "ATTACHMENT."

The permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete air quality permit application to the Forsyth County Office of Environmental Assistance and Protection and received an Air Quality Permit, except as provided in this permit or in accordance with applicable provisions of the Forsyth County Air Quality Technical Code.

This permit supersedes all previous permits issued to the permittee by the Forsyth County Office of Environmental Assistance and Protection.

Peter B. Lloyd, Ph.D., P.E., Program Manager
Compliance Assistance & Permitting Division

DATE:

PART I

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SECTION 1 FACILITY-WIDE PERMITTED EQUIPMENT AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)

Emission Source ID #	Emission Source Description	Control Device ID#	Control Device Description
ES-21 through ES-24, ES-26, ES-43 and ES-45	Seven can printers (1,200 cans per minute capacity each except for ES-23 and ES-24 (Lines 3 & 4 Printers) which each have a capacity of 1,610 cans per minute, ES-22 (Line 2 Printer) which has a capacity of 1,225 cans per minute, and ES-43 (Line 6 Printer) which has a capacity of 1,575 cans per minute.	None	None
ES-06 through ES-11, and ES-44	Seven printer ovens each fired with natural gas with a maximum heat input rate of 4.2 million Btu per hour for ES-06, ES-07, ES-10, and ES-11, and 2.15 million Btu per hour for ES-08 and ES-09, and 3.3 million Btu per hour for ES-44	None	None
ES-18	Inside Spray machines: Line 1 (eight spray nozzles) Line 2 (eight spray nozzles)	None	None
ES-19	Inside Spray machines: Line 3 (twelve spray nozzles) Line 4 (twelve spray nozzles)	None	None
ES-20	Inside Spray machines: Line 5A (eight spray nozzles) and 5B (four spray nozzles)	None	None
ES-46	Inside Spray machines: Line 6 (twelve spray nozzles)	None	None
ES-12 and ES-14	Two inside bake ovens each fired with natural gas with a maximum heat input rate of 5.4 million Btu per hour each	None	None
ES-13 and ES-47	Two inside bake ovens each fired with natural gas with a maximum heat input rate of 4.5 million Btu per hour for Lines 3 and 4 and 6.0 million Btu per hour for Line 6	CD-48	Regenerative thermal oxidizer fired with natural gas with a maximum heat input rate of 2.3 million Btu per hour or to atmosphere
ES-F	Clean up solvent usage	None	None

Emission Source ID #	Emission Source Description	Control Device ID#	Control Device Description
ES-41 and ES-42	Two Kewanee model H3W-400-G02 boilers fired with natural gas and/or propane with a maximum heat input rate of 18.740 million Btu per hour each	None	None

SECTION 2 FACILITY GENERAL ADMINISTRATIVE CONDITIONS

2.1 General Provisions [Sections 3-0100, 0200 and Rule 3Q .0508(i)(16)]

- A. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in Subchapters 3D and 3Q of the Forsyth County Air Quality Technical Code (FCAQTC).
- B. The terms, conditions, requirements, limitations and restrictions set forth in this permit are binding and enforceable pursuant to Sections 3-0100 and 0200 of the Forsyth County Air Quality Ordinance (FCAQO), including assessment of civil and/or criminal penalties. This permit is valid only for the specific processes and operations applied for and indicated in the air quality permit application. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and enforcement action by this Office.
- C. This permit is not a waiver of or approval of any other permits that may be required for other aspects of the facility which are not addressed in this permit.
- D. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore. This permit does not allow the permittee to cause pollution in contravention of local laws or rules, unless specifically authorized by an order from the Director, or to cause pollution in contravention of state laws or rules.
- E. Terms and conditions contained herein shall be enforceable by this Office, the U.S. EPA and citizens of the United States as defined in the federal Clean Air Act, except those identified as **Locally Enforceable Only** requirements which are enforceable by this Office.
- F. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained or modified without the appropriate and valid permits issued by this Office, unless the source is exempted by rule. This Office may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the applicable requirements.
- G. In addition to the authority found in Rules 3D. 0501 and 3Q .0508(i)(16), any deviation from the monitoring provisions of this permit may result in a request by this Office to submit data on rates of emissions in order to demonstrate compliance with any applicable regulation.

2.2 Permit Availability [Rules 3Q .0507(k), .0508(i)(16), .0508(i)(9) and .0110]

The permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of this Office or the U.S. EPA upon

request.

2.3 Submissions [Rules 3Q .0507(c), .0508(i)(16) and .0104]

All documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required to be sent to this office by this permit shall be submitted to the Forsyth County Office of Environmental Assistance and Protection, 201 N. Chestnut Street, Winston-Salem, NC 27101-4120.

2.4 Severability Clause [Rule 3Q .0508(i)(2)]

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any specific circumstance, is challenged, the application of the provision in question to other circumstances, as well as the remainder of this permit's provisions, shall not be affected.

2.5 Duty to Comply [Rule 3Q .0508(i)(3)]

The permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

2.6 Need to Halt or Reduce Activity Not a Defense [Rule 3Q .0508(i)(4)]

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

2.7 Permit Shield [Rule 3Q .0512(a)]

- A. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
- B. A permit shield shall not alter or affect:
 - 1. the power of the Forsyth County Board of Commissioners, Director, or Governor under NCGS 143-215.3(a)(12) or the U.S. EPA under Section 303 of the federal Clean Air Act;
 - 2. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
 - 3. the applicable requirements under Title IV of the Clean Air Act; or
 - 4. the ability of the Director or the U.S. EPA under Section 114 of the federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
- C. A permit shield shall not apply to any change made at a facility that does not require

a permit or to any permit revision made under Rule 3Q .0523.

D. A permit shield shall not extend to minor permit modifications made under Rule 3Q .0515.

2.8 Circumvention [Rules 3D .0502 and 3Q .0508(i)(16)]

No person shall circumvent any permitted air pollution control device, or allow the emissions of regulated air pollutants without the applicable air pollution control device operating properly. Unless otherwise specified by this permit, no permitted emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

2.9 Good Air Pollution Control Practice [Rules 3D .0502 and 3Q .0508(i)(16)]

At all times, the equipment listed in *Section 1* shall be operated and maintained in a manner consistent with the design and emissions control as applied for in the application.

2.10 Reporting Requirements for Excess Emissions and Permit Deviations [Rules 3D .0535(f) and 3Q .0508(f)(2), 3Q .0508(i)(16) and 3Q .0508(g)]

“Excess Emissions” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections 3D .0500, .0900, .1200 or .1400; or by a permit condition; or that exceeds a **Locally Enforceable Only** emission limit established in a permit issued under Section 3Q .0700. (*Note: This definition applies where the NSPS does not further define excess emissions for an affected NSPS emissions source.*)

“Deviation” - means any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions.

A. Sources subject to Rules 3D .0524, .1110 or .1111
Excess Emissions and Permit Deviations

1. If the source specific NSPS (3D .0524) or NESHAP (3D .1110 or .1111) defines “excess emissions”, these shall be reported as prescribed in 3D .0524, .1110 or .1111.
2. If the source specific NSPS (3D .0524) or NESHAP (3D .1110 or .1111) does NOT define “excess emissions”, the permittee shall report excess emissions as deviations from permit requirements as prescribed in paragraph 3, below.
3. In addition to any specific NSPS or NESHAP reporting requirements the permittee shall upon becoming aware:
 - a. report to this Office any deviations from permit requirements by the next business day, unless an alternative reporting schedule is specifically provided in the permit, and

- b. report in writing to this Office all deviations from permit requirements or any excess emissions within two business days, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such deviations and any corrective actions or preventative actions taken. Reports of all deviations from permit requirements shall be certified by a responsible official.
- B. Sources NOT subject to Rules 3D .0524, 1110 or .1111
1. Excess Emissions Greater than Four Hours in Duration [3D .0535(f)]
The permittee shall report excess emissions greater than four hours in duration as prescribed in Rule 3D .0535(f) including, but not limited to the following:
 - a. Notify this Office of any such occurrence by 9:00 a.m. Eastern time of this Office's next business day of becoming aware of the occurrence as described in Rule 3D .0535(f)(1);
 - b. Notify this Office immediately when corrective measures have been accomplished; and
 - c. Submit, if requested, to this Office within 15 days after the request, a written report as described in Rule 3D .0535(f)(3).
 2. Excess Emissions Less than Four Hours in Duration and Deviations [3Q .0508(f)]
The permittee shall report excess emissions less than four hours in duration and deviations from permit requirements as follows:
 - a. Report to this Office any excess emissions less than four hours in duration and any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit; and
 - b. Report in writing to this Office any excess emission less than four hours in duration or any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such excess emissions and deviations and any corrective actions or preventative actions taken. All reports of excess emissions and deviations from permit requirements shall be certified by a responsible official.
- C. Other Requirements under Rule 3D .0535 (Rule 3D .0535(g) is **Locally Enforceable Only**.)

The permittee shall comply with all other requirements contained in Rule 3D .0535.

2.11 Emergency Provisions <40 CFR 70.6(g)>

The permittee shall be subject to the following provision with regard to emergencies:

- A. An "emergency" means any situation arising from sudden and reasonably

unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

- B. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in paragraph C below are met.
- C. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - 1. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - 2. the permitted facility was at the time being properly operated;
 - 3. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the standards, or other requirements in the permit; and
 - 4. the permittee submitted notice of the emergency to this Office within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, and steps taken to mitigate emissions, and corrective actions taken.
- D. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- E. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

2.12 Permit Fees [Rules 3Q .0206(b), .0508(i)(10)) and .0519(a)(4)]

If, within 30 days after being billed, the permittee fails to pay an annual permit fee required under Subchapter 3Q .0200 of the FCAQTC, the Director may initiate action to terminate this permit under Rule 3Q .0519 of the FCAQTC.

2.13 Annual Emission Inventory Requirements [Rule 3Q .0207]

The permittee shall report to the Director by June 30th of each year the actual emissions of each air pollutant listed in Rule 3Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form(s) as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

2.14 Compliance Certification <40 CFR 70.6(c)> [Rules 3Q .0508(n) and .0508((i)(16))]

By March 1st unless another date is established by the Director, the permittee shall submit to this Office and the U.S. EPA (**U.S. EPA Region 4, Air Enforcement Section, Mail Code: 4APT-AEEB, 61 Forsyth Street, S.W., Atlanta, GA 30303**) a compliance certification by a responsible official with all terms and conditions in the permit, including emissions limitations, standards, or work practices. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the federal Clean Air Act. The compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

- A. the identification of each term or condition of the permit that is the basis of the certification;
- B. the identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include at a minimum, the methods and means required under 40 CFR 70.6(a)(3). If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- C. the status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph B above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- D. such other facts as the permitting authority may require to determine the compliance status of the source.

2.15 Retention of Records [Rule 3Q .0508(f)]

The permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit.

2.16 NESHAP - Recordkeeping Requirement for Applicability Determinations <40 CFR 63.10(b)(3)> [Rule 3D .1111]

If the permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR Part 63, the permittee shall keep a record of the applicability determination on site at the

source for a period of 5 years after the determination, or until the source changes its operations to become an affected source. This record shall include all of the information required under 40 CFR 63.10(b)(3).

2.17 Duty to Provide Information [Rule 3Q .0508(i)(9)]

- A. The permittee shall furnish to this Office, in a timely manner, any reasonable information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
- B. The permittee shall furnish this Office with copies of records required to be kept by the permit when such copies are requested by the Director.

2.18 Duty to Supplement or Correct Application [Rule 3Q .0507(f)]

The permittee, upon becoming aware that any relevant facts were omitted from the application or that incorrect information was submitted with the application, shall promptly submit such supplementary facts or corrected information to this Office. The permittee shall also provide additional information necessary to address any requirements that become applicable to the source after the date a complete application was submitted but prior to release of the draft permit.

2.19 Certification by Responsible Official [Rule 3Q .0520]

A responsible official (as defined in 40 CFR 70.2) shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statement and information in the document are true, accurate, and complete.

2.20 Inspection and Entry [Rule 3Q .0508(l)]

- A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of this Office to perform the following:
 - 1. enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
 - 2. have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
 - 3. inspect, at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

4. sample or monitor substances or parameters, at reasonable times and using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements.

Nothing in this condition shall limit the ability of the U.S. EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

- B. No person shall obstruct, hamper or interfere with any such authorized representative while in the process of carrying out his official duties.

2.21 Averaging Times <40 CFR 70.6(a)(3)> [Rule 3Q .0508(f)]

Unless otherwise specified in *Section 3* of this permit for a specific emission standard or limitation, the applicable averaging period for determining compliance with an emission standard or limitation during compliance testing shall be based on the applicable U.S. EPA reference test method.

2.22 Compliance Testing [Rule 3D .2602(e)]

When requested by this Office for determining compliance with emission control standards, the permittee shall provide sampling ports, pipes, lines, or appurtenances for the collection of samples and data required by the test procedure; scaffolding and safe access to the sample and data collection locations; and light, electricity, and other utilities required for sample and data collection.

2.23 General Emissions Testing and Reporting Requirements [Rules 3D .2602 and 3Q .0508(i)(16)]

Testing shall be conducted in accordance with FCAQTC Section 3D .2600 except as may be otherwise required in FCAQTC Rules 3D .0524, 3D .0912, 3D .1110, 3D .1111, 3D .1415 or a permit condition specific to the emissions source. Requests to use an alternative test method or procedure must be made in writing at least 45 days prior to the test and approved by this Office. Alternatives to test methods or procedures specified for emissions sources subject to test requirements under 40 CFR 60, 40 CFR 61 or 40 CFR 63, may require approval by the U.S. EPA. When required to conduct emissions testing under the terms of the permit:

- A. The permittee shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved prior to air pollution testing. Emission testing protocols must be submitted at least 45 days before conducting the test for pre-approval prior to testing if requested by the permittee.
- B. The permittee shall notify this Office of the specific test dates at least 10 days prior to the scheduled test date in order to afford this Office the opportunity to have an observer on-site during the sampling program.
- C. During all sampling periods, the permittee shall operate the emission source(s) under

operating conditions that best fulfill the purpose of the test and are approved by the Director or his delegate.

- D. The permittee shall submit one copy of the test report to this Office not later than 30 days after sample collection. The permittee may request an extension to submit the final test report if the extension request is a result of actions beyond the control of the permittee. The test report shall contain at a minimum the following information:
1. a certification of the test results by sampling team leader and facility representative;
 2. a summary of emissions results expressed in the same units as the emission limits given in the rule for which compliance is being determined and text detailing the objectives of the testing program, the applicable state and federal regulations, and conclusions about the testing and compliance status of the emission source(s) as appropriate;
 3. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics as necessary;
 4. all field, analytical and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
 5. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
 6. documentation of facility operating conditions during all testing periods and an explanation relating these operating conditions to maximum normal operation. If necessary, provide historical process data to verify maximum normal operation.
- E. This Office will review emission test results with respect to the specified testing objectives as proposed by the permittee and approved by this Office.

2.24 Termination, Modification, and Revocation of the Permit [Rule 3Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

- A. the information contained in the application or presented in support thereof is determined to be incorrect;
- B. the conditions under which the permit or permit renewal was granted have changed;
- C. violations of conditions contained in the permit have occurred;
- D. the permit holder fails to pay fees required under Section 3Q .0200 within 30 days after being billed;
- E. the permittee refuses to allow the Director or his authorized representative upon presentation of credentials:
 1. to enter, at reasonable times and using reasonable safety practices, the

- permittee's premises in which a source of emissions is located or in which any records are required to be kept under terms and conditions of the permit;
2. to have access, at reasonable times, to any copy or records required to be kept under terms and conditions of the permit;
 3. to inspect, at reasonable times and using reasonable safety practices, any source of emissions, control equipment, and any monitoring equipment or method required in the permit; or
 4. to sample, at reasonable times and using reasonable safety practices, any emission sources at the facility;
- F. the U.S. EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
- G. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of Chapter 3 of the Forsyth County Code.

2.25 Permit Reopenings, Modifications, Revocations and Reissuances, or Terminations
[Rule 3Q .0508(i)(5)]

The Director may reopen, modify, revoke and reissue, or terminate this permit for reasons specified in Rule 3Q .0517 or .0519. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition in this permit.

2.26 Permit Renewal [Rule 3Q .0508(e) and Rule 3Q .0513]

This permit is issued for a term not to exceed five years. Permits issued under Title IV of the Clean Air Act shall be issued for a fixed period of five years. This permit shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete renewal application is submitted at least nine months before the date of permit expiration. If the permittee or applicant has complied with Rule 3Q .0512(b)(1), this permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.

2.27 Reopening for Cause [Rules 3Q .0517 and .0508(g)]

This permit shall be reopened and revised in accordance with Rule 3Q .0517 prior to its expiration date, for any of the following reasons:

- A. Additional applicable requirements become applicable to the facility with remaining permit term of three or more years.
- B. Additional requirements, including excess emissions requirements, become applicable to this source under Title IV of the Clean Air Act. Excess emissions offset

plans for this source shall become part of this permit upon approval by the U.S. EPA.

- C. The Director or the U.S. EPA finds that a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- D. The Director or the U.S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

2.28 Construction and Operation Permits [Sections 3Q .0100 and .0300]

A construction and operating permit shall be obtained by the permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification; in accordance with all applicable provisions of Sections 3Q .0100 and .0300.

2.29 Permit Modifications [Rules 3Q .0514, .0515, .0516, .0517, .0523 and .0524]

- A. Permit modifications may be subject to the requirements of Rules 3Q .0514, .0515, .0516 and .0524.
- B. Changes made pursuant to Rules 3Q .0523(a) and (b) do not require a permit modification.
- C. The permittee shall submit an application for reopening for cause in accordance with Rule 3Q .0517 if notified by this Office.
- D. To the extent that emissions trading is allowed under FCAQTC Subchapter 3D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to Rule 3Q .0523(c).

2.30 Insignificant Activities [Rules 3Q .0503 and .0508(i)(15)]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The permittee shall have available at the facility at all times and made available to an authorized representative of this Office upon request, documentation, including calculations if necessary, to demonstrate that an emission source or activity is insignificant.

2.31 Standard Application Form and Required Information [Rules 3Q .0505 and .0507]

The permittee shall submit applications and required information in accordance with the

provision of Rules 3Q .0505 and .0507.

2.32 Property Rights [Rule 3Q .0508(i)(8)]

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

2.33 Refrigerant Requirements (Stratospheric Ozone and Climate Protection) [Rule 3Q .0508(b)]

- A. If the permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR 82 Subpart A, Appendices A and B, the permittee shall service, repair, and maintain such equipment according to the work practices and personnel certification requirements, and the permittee shall use certified recycling and recovery equipment specified in 40 CFR 82 Subpart F.
- B. The permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR 82 Subpart F.
- C. The permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the U.S. EPA or its designee as required.

2.34 Prevention of Accidental Releases - Section 112(r) [Rule 3Q .0508(h)]

If the permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the federal Clean Air Act, then the permittee is required to register this plan in accordance with 40 CFR Part 68.

2.35 Title IV Allowances [Rule 3Q .0508(i)(1)]

The facility's emissions are prohibited from exceeding any allowances that the facility lawfully holds under Title IV of the Clean Air Act. This permit shall not limit the number of allowances held by the permittee, but the permittee may not use allowances as a defense to noncompliance with any other applicable requirement.

2.36 Air Pollution Alert, Warning or Emergency [Section 3D .0300]

Should the Director of this Office declare an Air Pollution Alert, Warning or Emergency, the permittee will be required to operate in accordance with the permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in Section 3D .0300.

2.37 Registration of Air Pollution Sources [Rule 3D .0202]

The Director of this Office may require the permittee to register a source of air pollution. If

the permittee is required to register a source of air pollution, this registration and required information shall be in accordance with Rule 3D .0202(b).

2.38 Ambient Air Quality Standards [Rule 3D .0501(e)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in Rule 3D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

2.39 Odor [Rule 3D .0522] *Locally Enforceable Only*

The permittee shall not cause or permit the emission of odors beyond the facility's property lines which are harmful, irritating or which unreasonably interfere with the use and enjoyment of any person's properties or living conditions, or any public properties or facilities. Such odors are prohibited by Rule 3D .0522. No violation shall be cited, provided that the best practical treatment, maintenance, and control of odor(s) currently available is used. This requirement does not apply to normal agricultural practices, nor to accidental emissions of odors which are not normally produced during routine operations and activities as determined by the Director.

2.40 Fugitive Dust Control Requirement [Rule 3D .0540]

The permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR 60, Appendix A), the owner or operator may be required to submit and implement a fugitive dust control plan as described in 3D .0540(f).

New Source Performance Standards (NSPS) General Conditions - [Rule 3D .0524]

Following are conditions found in the 40 CFR Part 60 NSPS General Provisions. The following conditions only apply to sources subject to a relevant standard of a subpart of 40 CFR Part 60 except when otherwise specified in a particular subpart or in a relevant standard.

2.41 NSPS - General Provisions <40 CFR 60 Subpart A> [Rule 3D .0524]

The permittee shall comply with all applicable requirements specified in the general provisions of the New Source Performance Standards (40 CFR 60 Subpart A) including but not limited to requirements concerning notifications, testing, monitoring, recordkeeping, modifications and reconstruction.

2.42 NSPS - Good Air Pollution Control Practice <40 CFR 60.11(d)> [Rule 3D .0524]

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

2.43 NSPS - Circumvention <40 CFR 60.12> [Rule 3D .0524]

Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard under 40 CFR 60. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

2.44 NSPS - Maintain Records - Startup/Shutdown/Malfunction <40 CFR 60.7(b)> [Rule 3D .0524]

The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

2.45 NSPS - Files Available for Inspection <40 CFR 60.7(f)> [Rule 3D .0524]

The permittee shall maintain a file of all measurements, including, if applicable, performance test measurements and all other information required in 40 CFR 60. This file shall be kept in a permanent form suitable for inspection and shall be retained at least two years following the date of such measurements, maintenance, reports, and records.

2.46 NSPS - Performance Testing Facilities Provided by Permittee <40 CFR 60.8(e)> [Rule 3D .0524]

For any performance testing, the permittee shall provide, or cause to be provided, performance testing facilities as follows:

- A. Sampling ports adequate for the applicable test methods. This includes:
 - 1. constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and
 - 2. providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
- B. Safe sampling platform(s) with safe access.
- C. Utilities for sampling and testing equipment.

- D. Unless otherwise specified in the applicable subpart, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For purposes of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply.

Compliance Assurance Monitoring for Major Stationary Sources (CAM) General Conditions - [40 CFR Part 64]

Following are conditions based on the requirements found in 40 CFR Part 64. These conditions only apply to sources subject to the CAM requirements.

2.47 CAM - Proper Maintenance <40 CFR 64.7(b)> [Rule 3D .0614]

At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

2.48 CAM - Continued Operation <40 CFR 64.7(c)> [Rule 3D .0614]

Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

2.49 CAM - Response to Excursions or Exceedances <40 CFR 64.7(d)> [Rule 3D .0614]

Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designed condition, or below the applicable emissions limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. Based on the results of this determination, this Office may require the permittee to develop and implement a Quality Improvement Plan (QIP). The elements of a QIP are identified in 40 CFR 64.8(b).

2.50 CAM - Documentation of Need for Improved Monitoring <40 CFR 64.7(e)> [Rule 3D .0614]

After approval of the CAM plan, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify this Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conduction monitoring and collecting data, or the monitoring of additional parameters.

SECTION 3 SPECIFIC LIMITATIONS AND CONDITIONS

The emission source(s) and associated air pollution control device(s) listed below are subject to the following specific terms, conditions, and limitations, including the monitoring recordkeeping, and reporting requirements to which those requirements apply:

- 3.1 SEVEN CAN PRINTERS (ID Nos. ES-21 through 24, 26, 43, and 45), Exhausting to Atmosphere,
SEVEN PRINTER OVENS (ID Nos. ES-06 through 11, and 44), Exhausting to Atmosphere
FOUR GROUPS OF INSIDE SPRAY MACHINES (ID Nos. ES-18 through 20, and ES-46), Exhausting to Atmosphere,
TWO INSIDE BAKE OVENS (ID Nos. ES-12 and 14), Exhausting to Atmosphere,
TWO INSIDE BAKE OVENS (ID Nos. ES-13 and 47), Exhausting to a
REGENERATIVE THERMAL OXIDIZER (ID No. CD-48) OR to Atmosphere, and
ASSOCIATED CLEAN UP SOLVENT USAGE (ID No. ES-F), Fugitive Emissions**

Table 3.1: Summary of emission Limits, Standards, and Other Applicable Requirements.

Regulated Pollutant	Applicable Standard		Applicable Regulation
	Specific Limit	Specific Unit	
VOC	4.5 pounds VOC per gallon solids delivered	ES-21, ES-22, ES-26, and ES-45 (can printers and overvarnish operation)	Rule 3D .0918(c)(1)
VOC	9.8 pounds VOC per gallon solids delivered	ES-18 through ES-20 (inside spray machines) and ES-21, ES-22, ES-26, and ES-45 (can printers exterior end operation)	Rule 3D .0918(c)(2)
VOC	3.84 pounds VOC per gallon of coating solids	ES-08, ES-09, ES-23, ES-24, ES-43, and ES-44 (Lines 3, 4, and 6 can printer and oven overvarnish and clear base coating operation)	Rule 3D .0524 and 40 CFR 60.492(b) and 3D .0918 ¹
VOC	7.43 pounds of VOC per gallon of coating solids	ES-46 and ES-47 (Line 6 inside spray coating operation and inside bake oven) and ES-18 (Line 2 inside spray coating operation)	Rule 3D .0524 and 40 CFR 60.492(c) and 3D .0918 ¹

Regulated Pollutant	Applicable Standard		Applicable Regulation
	Specific Limit	Specific Unit	
VOC	535.2 tons per consecutive 12 months	ES-21 through ES-24, ES-26, ES-43, and ES-45 (can printers), ES-06 through ES-11, and ES-44 (printer ovens), ES-18 through ES-20, and ES-46 (inside spray machines), ES-12 through ES-14, and ES-47 (inside bake ovens), ES-F (clean up solvent usage)	Rules 3D .0530 and 3Q .0317
VOC	185.9 tons per consecutive 12 months	ES-26, ES-43, and ES-45 (can printers), ES-10, ES-11, and ES-44 (printer ovens), ES-20 and ES-46 (inside spray machines), ES-14 and ES-47 (inside bake ovens), ES-F (clean up solvent usage)	Rules 3D .0530 and 3Q .0317
VOC	103.4 tons per consecutive 12 months	ES-43, ES-44, ES-46, ES-47 (Line 6 equipment), and ES-F (clean up solvent usage)	Rules 3D .0530 and 3Q .0317
VOC	Associated work practice standards	ES-21 through ES-24, ES-26, ES-43, and ES-45 (can printers), ES-06 through ES-11, and ES-44 (printer ovens), ES-18 through ES-20, and ES-46 (inside spray machines), ES-12 through ES-14, and ES-47 (inside bake ovens), ES-F (clean up solvent usage)	Rule 3D .0958(c) and (d)
Particulate Matter	$E = 4.10 \times P^{0.67}$; where: E = allowable emission rate in pounds per hour, P = process rate in tons per hour	ES-18 through ES-20, and ES-46 (inside spray machines), ES-06 through ES-11, and ES-44 (printer ovens)** ES-12 through ES-14, and ES-47 (inside bake ovens)** CD-48 (regenerative thermal oxidizer)**	Rule 3D .0515

Regulated Pollutant	Applicable Standard		Applicable Regulation
	Specific Limit	Specific Unit	
*Sulfur Dioxide	2.3 pounds per million Btu	ES-06 through ES-11, and ES-44 (printer ovens), ES-12 through ES-14, and ES-47 (inside bake ovens), CD-48 (regenerative thermal oxidizer)	Rule 3D .0516
Visible Emissions	20% Opacity	ES-06 through ES-11, and ES-44 (printer ovens), ES-18 through ES-20, and ES-46 (inside spray machines), ES-12 through ES-14, and ES-47 (inside bake ovens) CD-48 (regenerative thermal oxidizer)	Rule 3D .0521(d) (see condition 3.3(B) for requirements)

¹ ES-18 (Line 2 inside spray coating operation), ES-43, ES-44, ES-46, and ES-47 are also subject to Rule 3D .0918. Compliance is assured by meeting the more stringent NSPS standards.

*3D .0516 - *Sulfur Dioxide Emissions from Combustion Sources* applies to the direct-fired natural gas burners associated with the affected units. Use of only natural gas assures compliance with this standard. No monitoring, recordkeeping, or reporting is required to assure compliance.

**3D .0515 – *Particulate Emissions from Miscellaneous Industrial Processes* applies to the natural gas direct-fired ovens. Use of only natural gas assures compliance with this standard. No monitoring, recordkeeping, or reporting is required to assure compliance.

A. Can Coating [Rule 3D .0918]

ES-21, ES-22, ES-26, and ES-45 (can printers and overvarnish operation)
ES-18 through ES-20 (inside spray machines), and
ES-21, ES-22, ES-26, and ES-45 (can printers exterior end operation)

1. Standard [Rule 3D .0918(c)(1) & (2)]

- Emissions of volatile organic compounds (VOCs) from ES-21, ES-22, ES-26, and ES-45 (can printers and overvarnish operation) shall not exceed 4.5 pounds of volatile organic compounds per gallon of solids delivered to the coating applicator.
- Emissions of volatile organic compounds (VOCs) from ES-18 through ES-20 (inside spray machines), ES-21, ES-22, ES-26, and ES-45 (can printers exterior end operation) shall not exceed 9.8 pounds of volatile organic compounds per gallon of solids delivered to the coating applicator.

2. Testing [Rule 3D .0501(b)]

If emissions testing is required by this Office or U.S. EPA, or the permittee submits emissions testing to the Division in support of a permit application, the permittee shall

perform such testing in accordance with the appropriate EPA reference method(s) as approved by this Office. The permittee may request approval from this Office for an alternate test method or procedure in writing.

3. **Monitoring and Recordkeeping** [Rules 3D .0605 and 3Q .0508(f)]

The permittee shall maintain records of all coatings used in the affected sources. At a minimum, the records shall contain:

- a) the density of each coating in lb/gal,
- b) the percentage by weight of the volatile organic compound portion for each coating,
- c) the amount and percentage by weight of each volatile organic compound constituent of diluents added to each coating, if any, and
- d) the percentage by volume of solids for each coating.

These records shall be maintained at the facility and readily available for inspection for a period of not less than five (5) years.

4. **Reporting** [Rule 3Q .0508(f)]

All instances of deviations from the requirements for these emission sources and the duration of these deviations must be clearly identified and reported in writing to this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. If no deviations have occurred, the permittee shall make this statement in the report.

B. New Source Performance Standards [Rule 3D .0524 and 40 CFR 60.490 through 60.496]

ES-23, ES-24, ES-08, and ES-09 (Lines 3 and 4 can printers and ovens overvarnish and clear base coating operation,
ES-43 and ES-44 (Line 6 can printer and oven overvarnish and clear base coating operation),
ES-46 and ES-47 (Line 6 inside spray coating operation and inside bake oven), and
ES-18 (Line 2 inside spray coating operation)

1. **Standard** [Rule 3D .0524 and 40 CFR 60.492(b) and (c)]

- a) Emissions of volatile organic compounds (VOCs) from ES-23, ES-24, ES-08, ES-09, ES-43, and ES-44 (Lines 3, 4, and 6 can printer and oven overvarnish operation) shall not exceed the volume-weighted calendar-month average emissions of 3.84 pounds of volatile organic compounds per gallon of solids.
- b) Emissions of volatile organic compounds (VOCs) from ES-46 and ES-47 (Line 6 inside spray coating operation and inside bake oven) and ES-18 (Line 2 inside spray coating operation) shall not exceed the volume-weighted calendar-month average emissions of 7.43 pounds of volatile organic compounds per gallon of solids.

2. **Testing** [Rule 3D .0501(b)]

The permittee shall follow the testing requirements specified in permit condition **3.1.A.2** for these sources.

3. Monitoring and Recordkeeping [Rules 3D .0605 and 3Q .0508(f)]

The permittee shall maintain records of all coatings used in the affected sources. At a minimum, the records shall contain:

- a) the density of each coating in lb/gal,
- b) the percentage by weight of the volatile organic compound portion for each coating,
- c) the amount and percentage by weight of each volatile organic compound constituent of diluents added to each coating, if any, and
- d) the percentage by volume of solids for each coating.

These records shall be maintained at the facility and readily available for inspection for a period of not less than two (2) years.

4. Reporting [Rule 3Q .0508(f)]

All instances of deviations from the requirements for these emission sources and the duration of these deviations must be clearly identified and reported in writing to this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. If no deviations have occurred, the permittee shall make this statement in the report.

C. Prevention of Significant Deterioration (PSD Avoidance), Facility-wide [Rules 3D .0530 and 3Q .0317]

ES-21 through ES-24, ES-26, ES-43, and ES-45 (can printers),
ES-06 through ES-11, and ES-44 (printer ovens),
ES-18 through ES-20, and ES-46 (inside spray machines),
ES-12 through ES-14, and ES-47 (inside bake ovens), and
ES-F (clean up solvent usage)

1. Standard [Rule 3Q .0317(a)]

In order to avoid the applicability of 3D .0530(g) for major sources and major modifications for the inside spray machines (ID Nos. ES-18, ES-19, and ES-20) installed in 1991, volatile organic compound emissions from the sources listed above combined shall not exceed **535.2 tons per consecutive 12 months**.

2. Testing [Rules 3Q .0317(b) and .0508(f)]

The permittee shall follow the testing requirements specified in permit condition **3.1.A.2** for these sources.

3. Monitoring and Recordkeeping [Rules 3Q .0317(b) and .0508(f)]

In order to demonstrate compliance with the emission limit the following monitoring and recordkeeping requirements apply:

- a) The permittee shall maintain monthly records of the VOC usage in the affected facilities.
- b) The permittee shall record the monthly VOC emissions in tons/month and the 12 month rolling total of VOC emissions in tons per year at the end of each month.

4. **Reporting** [Rules 3Q .0317(b) and .0508(f)]
 - a) VOC emissions from the affected sources shall be reported semi-annually to this Office. The report shall include the total VOC emissions for each month and the 12-month rolling total of VOC emissions for each month. This report shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December.
 - b) All instances of deviations from the requirements for these emission sources and the duration of these deviations must be clearly identified and reported in writing to this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. If no deviations have occurred, the permittee shall make this statement in the report

D. Prevention of Significant Deterioration (PSD Avoidance), Lines 5 and 6 [Rules 3D .0530 and 3Q .0317]

ES-26, ES-43, and ES-45 (can printers),
ES-10, ES-11, and ES-44 (printer ovens),
ES-20 and ES-46 (inside spray machines),
ES-14, and ES-47 (inside bake ovens), and
ES-F (clean up solvent usage)

1. **Standard** [Rule 3Q .0317(a)]

In order to avoid the applicability of 3D .0530(g) for major sources and major modifications for the Line 5/6 printers (ID Nos. ES-26 & 43) installed in 2000, VOC emissions from the sources listed above combined shall not exceed **185.9 tons per consecutive 12 months**.
2. **Testing** [Rule 3D .0501(b)]

The permittee shall follow the testing requirements specified in permit condition **3.1.A.2** for these sources.
3. **Monitoring and Recordkeeping** [Rules 3Q .0317(b) and .0508(f)]

In order to demonstrate compliance with the emission limit the following monitoring and recordkeeping requirements apply:

 - a) The permittee shall maintain monthly records of the VOC usage in the affected facilities.
 - b) The permittee shall record the monthly VOC emissions in tons/month and the 12 month rolling totals in tons per year at the end of each month.
4. **Reporting** [Rules 3Q .0317(b) and .0508(f)]
 - a) VOC emissions from the affected sources shall be reported semi-annually to this Office. The report shall include the total VOC emissions for each month and the 12-month rolling totals for each month. This report shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December.
 - b) All instances of deviations from the requirements for these emission sources and the duration of these deviations must be clearly identified and reported in writing to this

Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. If no deviations have occurred, the permittee shall make this statement in the report.

E. Prevention of Significant Deterioration (PSD Avoidance), Line 6 [Rules 3D .0530 and 3Q .0317]

ES-43 (can printer),
 ES-44 (printer ovens),
 ES-46 (inside spray machines),
 ES-47 (inside bake ovens), and
 ES-F (clean up solvent usage)

1. Standard [Rule 3Q .0317(a)]

In order to avoid the applicability of 3D .0530(g) for major sources and major modifications for the Line 6 equipment listed above, VOC emissions from the sources listed above combined shall not exceed **103.4 tons per consecutive 12 months**. The permittee shall demonstrate compliance with this PSD avoidance limit through the use of the following equation:

$$E_{VOC} = \sum_{n=1}^{12} \frac{[(A) + (B) + (1 - Ox/100)(C) + (D)]}{2000 \text{ lbs/ton}}$$

where,

E_{VOC} = monthly rolling 12-month total emissions (in tons) of volatile organic compounds;

A = the monthly amount of VOC emissions from the uncontrolled equipment on Line 6 (ES-43, ES-44, and ES-46);

B = the monthly amount uncontrolled VOC emissions from the inside bake oven (ES-47) on Line 6;

Ox = the overall control efficiency (%) of the regenerative thermal oxidizer (CD-48) based on the most recent performance test;

C = the monthly amount of VOC emissions from inside bake oven (ES-47) on Line 6 routed through the regenerative thermal oxidizer (CD-48);

D = the monthly amount VOC emissions from the clean up solvent usage on Line 6 (ES-F); and

n = the month (1...12).

2. Testing [Rule 3D .0501(b)]

The permittee shall follow the testing requirements specified in permit condition **3.1.A.2** for these sources.

3. **Monitoring and Recordkeeping** [Rules 3Q .0317(b) and .0508(f)]

In order to demonstrate compliance with the emission limit the following monitoring and recordkeeping requirements apply:

- a) The permittee shall maintain monthly records of the VOC usage in the affected facilities as identified in the equation in condition **3.1(E)(1)** above.
- b) The permittee shall record the monthly VOC emissions in tons/month and the 12 month rolling totals in tons per year at the end of each month using the equation in condition **3.1(E)(1)** above.

4. **Compliance Assurance Monitoring and Recordkeeping for CD-48** [Rules 3D .0614, 3Q .0508(f), and 40 CFR Part 64]

In order to demonstrate compliance with the CAM plan for the regenerative thermal oxidizer (CD-48), the following monitoring and recordkeeping requirements apply:

- a) The regenerative thermal oxidizer control temperature shall be continuously monitored to ensure the combustion chamber temperature is maintained at a minimum of 1400 degrees F to ensure minimum destruction efficiency for the unit. The combustion chamber temperature shall be recorded at least four times equally spaced over an hour. The temperature shall be monitored by a device accurate to within $\pm 1.0\%$ or ± 10 degrees F, whichever is greater.
- b) The permittee shall perform annual preventative maintenance including the replacement of the thermocouple. The permittee shall record the results of all the inspection, calibration and maintenance activities in a log on site and have it available for inspection by this Office. The log shall include the date, inspector's name, and any corrective action taken as a result of the inspection and/or calibration.
- c) The permittee shall record the number of hours the emissions are routed to the regenerative thermal oxidizer for each operational day.
- d) The permittee shall continuously monitor the flow at the fan inlet to the regenerative thermal oxidizer

5. **Reporting** [Rules 3D .0614, 3Q .0317(b), .0508(f), and 40 CFR Part 64]

The permittee shall submit the following reports:

- a) VOC emissions from the affected sources shall be reported semi-annually to this Office. The report shall include the total VOC emissions for each month and the 12-month rolling totals for each month. This report shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December.
- b) All instances of deviations from the requirements for these emission sources and the duration of these deviations must be clearly identified and reported in writing to this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. If no deviations have occurred, the permittee shall make this statement in the report.
- c) A summary report of the compliance assurance monitoring required in condition **3.1(E)(4)** above including, as a minimum:

- i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with calibration checks, if applicable); and
- iii) A description of the actions taken to implement a QIP (if required by this Office) during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

F. Work Practices for Sources of Volatile Organic Compounds [Rule 3D .0958]

ES-21 through ES-24, ES-26, ES-43, and ES-45 (can printers),
ES-06 through ES-11, and ES-44 (printer ovens),
ES-18 through ES-20, and ES-46 (inside spray machines),
ES-12 through ES-14, and ES- 47 (inside bake ovens), and
ES-F (clean up solvent usage)

1. **Facility-wide work practice standards [Rule 3D .0958(c)]** - The owner or operator of any facility subject to this Rule shall:
 - a) store all material, including waste material, containing volatile organic compounds in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
 - b) clean up spills as soon as possible following proper safety procedures,
 - c) store wipe rags in closed containers,
 - d) not clean sponges, fabric, wood, paper products, and other absorbent materials, unless volatile organic compound emissions are captured and controlled,
 - e) drain solvents used to clean supply lines and other coating equipment into containers designed for closure, and close containers immediately after each use,
 - f) clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent, closing the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be poured into a closed container.
2. **Facility-wide work practice standards for parts cleaning [Rule 3D .0958(d) and 3Q .0508(i)(16)]** - When cleaning parts, the owner or operator of any facility subject to this Rule shall:
 - a) flush parts in the freeboard area,
 - b) take precautions to reduce the pooling of solvent on and in the parts,
 - c) tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
 - d) not fill cleaning machines above the fill line,
 - e) not agitate solvent to the point of causing splashing, unless volatile organic compound emissions are captured and controlled.

3. **Monitoring/Recordkeeping** [Rules 3D .0605 and 3Q .0508(f)] - To ensure compliance with the work practice standards above the permittee shall perform weekly inspections at each affected emissions unit to verify compliance with the work practices and identify any deviations. The results of the inspections and any deviations shall be recorded in a log (written or electronic form) on site and be readily available upon request by an authorized representative of the FCOEAP or U.S. EPA. The log shall contain the following records:
 - a) the date and time of each inspection
 - b) the results of each inspection
 - c) all deviations from required work practice standards and the corrective actions taken
4. **Reporting Requirements** [Rule 3D .0508(f)] - The permittee shall submit a summary report of the monitoring requirements specified in permit condition **3.1(F)(3)**, to this Office by July 30th for the period January through June, and no later than January 30th for the period July through December. This report shall contain the total number of weeks in which the work practice standards weekly check were not made during the reporting period.

G. Particulates from Miscellaneous Industrial Processes [Rule 3D .0515]

ES-18 through ES-20 and ES-46 (inside spray machines)

1. **Emission Limit** [Rule 3D .0515]
Emissions of particulate matter from the sources listed in (E) above shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

2. **Emission Limit** [Rule 3D .0515]
Based on maximum production capacities and Rule 3D .0515, the particulate emission rate from each inside spray machine line, except ES-18 (Line 2), ES-19, and ES-46, shall at no time exceed 4.55 pounds per hour. The particulate emission rate from ES-18 (Line 2) shall at no time exceed 4.50 pounds per hour, the particulate emission rate from ES-46 shall at no time exceed 5.33 pounds per hour, and the particulate emission rate from ES-19 shall at no time exceed 5.40 pounds per hour.
3. **Testing** [Rule 3D .0501(b)]
The permittee shall follow the testing requirements specified in permit condition **3.1.A.2** for these sources. Excess visible emissions shall be grounds for this Office to require testing from these sources using appropriate U.S. EPA reference test methods for particulate matter as approved by this Office.

4. **Monitoring, Recordkeeping, and Reporting Requirements** [Rules 3D .0605 and 3Q .0508(f)]

There are no controls devices on ES-18 through ES-20, and ES-46 and engineering calculations demonstrate compliance with the allowable limit in permit condition **3.1(G)(1)**. Therefore, no monitoring, recordkeeping, or reporting is required to assure compliance.

H. **Permit Shield from Applicable Requirement for the Inside Spray Machines** [Rule 3Q .0512(a)]

ES-18 through ES-20 (inside spray machines)

The inside spray machines ES-18 (except for Line 2), ES-19, and ES-20 shall not be subject to 40 CFR 60.490 "Standards of Performance for the Beverage Can Surface Coating Industry" unless and until the inside spray machines are modified under 40 CFR 60.14, reconstructed under 40 CFR 60.15, or replaced. This determination is based on information provided by the permittee demonstrating the addition of spray guns to the sources in 1991 did not result in an increase in the emission rate (expressed as kg/hr) of VOC to the atmosphere and was not a modification under 40 CFR 60.14.

I. **Permit Shield from Applicable Requirement for the Modification of Line 5** [Rule 3Q .0512(a)]

ES-26 and ES-45 (can printers)

Line 5 can printers (ID No. ES-26 and ES-45) shall not be subject to 40 CFR 60.490 "Standards of Performance for the Beverage Can Surface Coating Industry" unless and until the Line 5 printers are modified under 40 CFR 60.14, reconstructed under 40 CFR 60.15, or replaced.

This determination is based on the complete permit application provided by the permittee on February 2, 2000 for the addition of an 8 color printer to Line 5. This Office has determined that the addition of the printer to Line 5 (ES-45) does not constitute a modification under 40 CFR 60.14.

3.2 TWO NATURAL GAS/PROPANE-FIRED BOILERS (ID Nos. ES-41 and ES-42)**Table 3.2: Summary of Emission Limits, Standards, and Other Applicable requirements.**

Regulated Pollutant	Applicable Standard	Applicable Regulation
Particulate Matter	0.383 pounds per million Btu	Rule 3D .0503
Sulfur Dioxide	2.3 pounds per million Btu	Rule 3D .0516
Visible emissions	20 % opacity	Rule 3D .0521(d) (see condition 3.3(B) for requirements)

A. Particulates from Fuel Burning Indirect Heat Exchangers [Rule 3D .0503]

- Standard** [Rule 3D .0503]
Emissions of particulate matter from the combustion of natural gas or propane that are discharged from this source into the atmosphere shall not exceed 0.383 pounds per million Btu heat input.
- Testing** [Rule 3Q .0501(b)]
The permittee shall follow the testing requirements specified in permit condition **3.1(A)(2)** for these sources.
- Monitoring, Recordkeeping, and Reporting** [Rules 3D .0605 and 3Q .0508(f)]
No monitoring, recordkeeping, or reporting is required to demonstrate compliance with Rule 3D .0503 for the firing of natural gas or propane in this source.

B. Sulfur Dioxide Emissions from Combustion Sources [Rule 3D .0516]

- Standard** [Rule 3D .0516]
Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.
- Testing** [Rule 3Q .0501(b)]
The permittee shall follow the testing requirements specified in permit condition **3.1(A)(2)** for these sources.
- Monitoring, Recordkeeping, and Reporting** [Rules 3D .0605 and 3Q .0508(f)]
No monitoring, recordkeeping, or reporting is required to demonstrate compliance with Rule 3D .0516 for the firing of natural gas or propane in this source.

3.3 GENERAL FACILITY-WIDE EMISSION SOURCE CONDITIONS

A. Air Toxics [Sections 3D .1100 and 3Q .0700] *Locally Enforceable Only*

1. **Air toxics - general** [Sections 3D .1100 and 3Q .0700]
Specification of a listed toxic air pollutant (TAP) in this permit does not excuse the permittee from complying with the requirements of Sections 3D .1100 and 3Q .0700 of the FCAQTC with regard to any other listed TAP emitted from the regulated facility, nor does this permit exempt the permittee from compliance with any future air toxics regulations promulgated pursuant to the requirements of the Clean Air Act.
2. **Dispersion modeling emission limits** [Section 3D .1100]
Combined emissions of the following TAPs from all sources not exempted by Rule 3Q .0702(a) and (b) at this facility shall not exceed the emission rates listed below. Dispersion modeling using AERMOD (Lakes Environmental AERMOD View model version 5.6), performed in September, 2007 and approved by this Office, demonstrated that the permitted emissions of the TAPs listed in the table below from this facility impacted the surrounding ambient air at levels below the acceptable ambient levels (AALs) specified in Rule 3D .1104 of the FCAQTC. The emission rates listed below shall be used as a basis for certifying that any future modifications or changes in the methods of operation will result in ambient impacts below these AALs. In no case shall actual emissions resulting from changes or modifications exceed any of the following emission rates without first applying for and receiving a permit:

Pollutant	Maximum facility-wide emission rate
formaldehyde (50-00-0)	2.63 lb/hr

3. **Stack data** [Rules 3Q .0703(14), .0706, and .0308(a)(1)]
The permittee must obtain approval from this Office prior to the modification of any stack or vent identified in the September, 2007 modeling analysis which was used to calculate the TAP emission rates listed in permit condition **3.3(A)(2)**. The permittee must demonstrate that the modification will not cause or contribute to any significant ambient air concentration that may adversely affect human health as required in Section 3D .1100. Examples of what constitutes a modification in this condition include:
 - a) reduction in stack heights,
 - b) change in stack diameter,
 - c) reduction of the average stack exit velocity,
 - d) reduction in stack flow rate,
 - e) addition of stack obstructions (e.g. rain caps),
 - f) redirection or reorientation of stack emissions, or
 - g) reduction in average stack temperatures.
4. **Air toxic pollutant recordkeeping** [Rules 3D .0605, 3D .1105, and 3Q .0308(a)(1)]
The permittee shall maintain updated records of production rates, throughputs, material usage, and other process operational information as is necessary to determine

compliance with the emission rates specified in permit conditions **3.3(A)(2)**. At a minimum these records shall include data sufficient to calculate monthly averaged emission rates (in pounds per hour of emission source operation) for TAPs with 1-hour or 24-hour emission limits and yearly emission rates (in pounds per calendar year) for TAPs with annual emission limits.

Copies of these records shall be retained by the permittee for a period of three years after the date on which the record was made.

If requested by an agent of this Office, the permittee shall readily supply copies of these records at the time of the inspection. Likewise, the permittee shall submit copies of the records upon request by this Office.

B. Control of Visible Emissions [Rule 3D .0521]

ES-06 through ES-11, and ES-44 (printer ovens),
ES-18 through ES-20, and ES-46 (inside spray machines),
ES-12 through ES-14, and ES-47 (inside bake ovens),
CD-48 (regenerative thermal oxidizer)
ES-40, ES-41, and ES-42 (boilers)

1. Standard [Rule 3D .0521(d)]

Visible emissions from the sources above established after July 1, 1971 shall not exceed 20% opacity when averaged over a six-minute period except that six-minute periods averaging not more than 87% opacity may occur not more than once in any hour nor more than four times in any 24-hour period.

2. Testing [Rule 3D .0501(b)]

The permittee shall follow the testing requirements specified in permit condition **3.1(A)(2)** for these sources.

3. Monitoring and Recordkeeping [Rules 3Q .0317(b) and .0508(f)]

The permittee shall make a daily observation of the stacks/vents venting emissions from these sources. The permittee should attempt to make this observation during a period when the plant is operating at an average or greater than average capacity. The permittee shall keep a daily log of this daily visible emission stack observation. The log shall contain the following:

- a) the date and time of visual observation,
- b) the person(s) who performed visual observation,
- c) identification of stack(s) where visible emissions were occurring (note color, duration, density (heavy or light)), and whether the emissions are normal (otherwise, input a general overall statement or check that there were no problems noted on a plant-wide basis),
- d) where abnormal emissions are observed, the operating conditions under which the visual observation was conducted, and
- e) any actions taken to reduce the visible emissions.

This log shall be retained for at least 5 years from the event recorded and shall be made readily available upon request by an authorized representative of this Office or the U.S. EPA.

4. **Reporting** [Rule 3D .0508(f)]

All instances of deviations from the requirements for these emission sources and the duration of these deviations must be clearly identified and reported in writing to this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. If no deviations have occurred, the permittee shall make this statement in the report.

PART II

AIR QUALITY CONSTRUCTION PERMIT

The permittee is hereby authorized to construct air emission source(s) and associated air pollution control device(s) listed in Part II, Section 1, of this permit, in accordance with the associated air quality permit application(s) received, including all plans, specifications, previous applications, and other supporting data, all of which are filed with the Forsyth County Office of Environmental Assistance and Protection (FCOEAP) and are incorporated in Part II of this Air Quality Permit.

SECTION 1

PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)

This permit modification is for the following projects:

Line 6 Modification Project - The facility has requested that Line 6 be modified to allow for the printing and coating of variable can sizes (8 oz, 12 oz, 16 oz and 24 oz) versus the current 24 ounce can size. Line 6 currently has the ability to run 12 ounce, 24 ounce and other can sizes. This is accomplished by changing the tooling needed to "draw and iron" the cans in the can making process, raising or lowering the can conveyors, as well as, moving spray nozzles on the inside spray machines to accommodate different can heights.

SECTION 2

GENERAL CONDITIONS

This section describes terms and conditions applicable to the construction of the air emission source(s) and associated air pollution control device(s) listed in Section 1. Unless otherwise specified herein all references to the permit in this section apply only to Part II of the permit.

A. General Provisions

1. This permit is nontransferable by the permittee. Future owners and operators must obtain a new air quality permit from the FCOEAP.
2. This issuance of this permit in no way absolves the permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the issuance date of this permit.
3. A violation of any term or condition of Part II of this permit shall subject the permittee to enforcement pursuant to Forsyth County Air Quality Control Ordinance and Technical Code, including assessment of civil and/or criminal penalties.

B. **Submissions (REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, AND REQUESTS FOR RENEWAL)**

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the FCEAD.

C. **Part II Renewal Request**

The permittee shall request renewal of the emission source(s) and associated air pollution control device(s) listed in Section 1 at the same time as specified in Part I, Section 2.24 of this permit.

D. **Annual Fee Payment**

The permittee shall pay all fees in accordance with Forsyth County Air Quality Control Ordinance and Technical Code Subchapter 3Q .0200 and in conjunction with Part I, Section 2.12 of this permit.

E. **Reporting Requirements**

Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Director:

1. changes in the information submitted in the application;
2. changes that modify equipment or processes; or
3. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the FCOEAP to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

F. **Termination, Modification, and Revocation of the Permit**

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred; or
4. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of Forsyth county Air Quality control Ordinance and Technical Code.

G. **Inspection and Entry**

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the FCOEAP, or an authorized representative to perform the following:

1. enter the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
2. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
3. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

SECTION 3 SPECIFIC LIMITATIONS AND CONDITIONS

- 3.1 **Line 6 Modification Project** - The facility has requested that Line 6 be modified to allow for the printing and coating of variable can sizes (8 oz, 12 oz, 16 oz and 24 oz) versus the current 24 ounce can size. Line 6 currently has the ability to run 12 ounce, 24 ounce and other can sizes. This is accomplished by changing the tooling needed to "draw and iron" the cans in the can making process, raising or lowering the can conveyors, as well as, moving spray nozzles on the inside spray machines to accommodate different can heights.
- (a) **Operation** - This permit, **00682-TV-17**, authorizes the operation of Line 6 to print and coat cans of variable sizes (8 oz, 12 oz, 16 oz and 24 oz) as detailed in the permit modification application. **[Rule 3Q .0304(i)]**
 - (b) **30-day notification from start-up** - The permittee shall notify this Office of the actual start-up date of the completed project within 30 days after such date. This notification is to enable this Office to plan an inspection to verify compliance with any applicable standards. **[Rule 3A .0103(a)(5)]**
 - (c) **Commencement of construction** - If construction/modification of the project has not commenced within 18 months after the effective date of this permit (**Permit No. 00682-TV-17**), or if construction activities lapse for a period of 18 months after construction has commenced, the permittee shall reapply to this Office and obtain a permit to construct before commencing or resuming construction. **[Rule 3Q .0308(a)]**
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Significant Modification Statement of Basis Ardagh Metal Beverage USA, Inc.

July 11, 2017

Permit #00682-TV-17

Application received on July 3, 2017
Application Tracking Number 1253

PROCESSING

The changes requested in this modification will be **processed as a Significant Permit Modification** pursuant to Rule 3Q .0516 of the Forsyth County Air Quality Technical Code because the changes will add a new limit to avoid a Prevention of Significant Deterioration (PSD) review for Line 6.

The applicant originally submitted this modification as an Applicability Determination dated May 26, 2017 (received May 30, 2017). In discussing the proposed change with Peter Lloyd, it was determined that the change Ardagh was proposing constitutes a "change in the method of operation" with regard to the Prevention of Significant Determination (PSD) requirements. Therefore, the facility will need to determine if the change results in potential emissions greater than the 40 tons per year significance level for volatile organic compounds (VOC) in PSD. The information provided by Ardagh revealed that an emissions limit was necessary to avoid exceeding the significance level for PSD so this modification is considered a Significant Permit Modification. The applicant was instructed to submit a permit application for the proposed modification of Line 6. An application was received on July 3, 2017 (dated June 30, 2017).

-This Draft permit will go through a 30 day public comment period and a concurrent 45 day review by the U.S. EPA prior to final approval. This dual process is known as parallel processing.

The current permit expires on November 14, 2017. The facility submitted a timely renewal application but they would like to have this modification processed first because they plan on producing the small can size later this year. This modified permit will go through public notice and EPA review and will be followed by the renewal permit through the same process.

MODIFICATION SUMMARY

This Office received an application on July 3, 2017, to modify the existing Line 6 (consisting of Can Printer (ID No. ES-43), Can Printer Oven 6 (ID No. ES-44), Inside Spray Machines Bank (ID No. ES-46), Inside Bake Oven (ID No. ES-47), Regenerative Thermal Oxidizer (RTO) (ID no. CD-48) to reduce volatile organic compound (VOC) emissions from ES-47, and Can Washer (ID No. ES-49)) to allow for the production of 8, 10, 12, 16, 24 ounce cans on Line 6, which previously only produced 24 ounce cans. Changing the can size between runs requires a change in the tooling required to "draw and iron" the new can size. It also requires adjustments to the conveyors to accommodate the different can size, as well as, moving spray nozzles on the inside spray machines to accommodate the different can heights. According to the facility, these changes between can size runs can take up to a week to accomplish and

therefore, changing between can sizes is not something that would be done often. Usually, they would produce a certain size can and not switch to another size until they have met their production goals for a certain size. The applicant would like to continue producing 24 ounce cans until they make the changeover to 12 ounce cans in October 2017. They plan on running 12 ounce cans for the remainder of the year. For 2018, they estimate running 24 ounce cans for about 250 days and 12 ounce cans for about 100 days.

This proposed change was determined to be a change in the method of operation with regard to the PSD requirements and therefore, any increase in VOC emissions above the significant level of 40 tons per year would require a PSD review and the application of Best Available Control Technology (BACT) on Line 6. Currently, the inside bake ovens on Line 6 (ES-47) and the inside bake ovens on Lines 3 and 4 (ES-13) are routed through the regenerative thermal oxidizer (RTO) (CD-48). The permit also allows for VOC emissions to bypass the RTO. A calculation is included in the current permit to determine the monthly emissions of VOC from Line 6 to demonstrate they meet the current PSD avoidance limit of 108.5 tons per year.

When the applicant first submitted this proposed change to Line 6, the potential VOC emissions were calculated as going through the RTO all the time. The emissions totals were below the 40 tons per year significant level. I explained to the applicant that the permit allows for the emissions to atmosphere as they previously requested. If they want to change the permit to state the emissions must go through the RTO at all times then our Office could make this change. However, any operation of the Line without the use of the RTO would be a violation of their permit. The applicant stated they didn't want to lose this flexibility. In a telephone conversation regarding this proposed change, Peter Lloyd suggested the applicant submit a permit application with the understanding that the proposed potential VOC emissions exceed the PSD significant level and would accept a new PSD avoidance limit.

The applicant provided calculations of VOC emissions comparing the actual average emissions for the contemporaneous 24 month period covering calendar years 2011 and 2012 while producing 24 ounce cans to the future potential emissions for the production of cans of any size to demonstrate the modification is not subject to PSD regulations. The emissions look back is for a five year period. The calendar year 2011 emissions fall outside of this five year period but the applicant has stated that these two years are more representative of the emissions when the production wasn't curtailed due to market demands. A review of their reports indicates that the emissions started to decrease in the early part of calendar year 2013 and have decreased ever since. This Office has agreed to use these emissions as the baseline for Line 6.

APPLICABLE REGULATIONS

The proposal to allow for Line 6 to produce cans of varying sizes does not change any of the existing permit conditions at the facility with the exception of the PSD avoidance limit for Line 6. Below are the current rules for which Line 6 is subject and a brief description of the facility's compliance status with regard to these rules:

Rule 3D .0530 – Prevention of Significant Deterioration

The applicant provided calculations of VOC emissions comparing the two-year actual average emissions from Line 6 for calendar year's 2011 (63.56 tpy) and 2012 (63.38) to the potential VOC emissions from this modification. These two-year actual average VOC emissions are 63.47 tons. The applicant conceded that the potential emissions from the proposal to run varying size cans on Line 6 would exceed 40 tons per year. They requested a PSD avoidance

limit of 39.9 tons be added to the two-year actual average to establish a new limit for Line 6. The new PSD avoidance limit will be 103.4 tons per year (39.9 tpy + 68.47 tpy). This is a slight decrease from their current limit of 108.5 tons per year. Reports received from the facility for the past several years indicate that they will be able to comply with this limit, as their most recent 12-month total emissions are 55.29 tons per year.

As stated in their current permit, the applicant shall demonstrate compliance with the PSD avoidance limit through the use of the following equation:

$$E_{VOC} = \sum_{n=1}^{12} \frac{[(A) + (B) + (1 - Ox/100)(C) + (D)]}{2000 \text{ lbs/ton}}$$

where,

- E_{VOC} = monthly rolling 12-month total emissions (in tons) of volatile organic compounds;
- A = the monthly amount of VOC emissions from the uncontrolled equipment on Line 6 (ES-43, ES-44, and ES-46);
- B = the monthly amount uncontrolled VOC emissions from the inside bake oven (ES-47) on Line 6;
- Ox = the overall control efficiency (%) of the regenerative thermal oxidizer (CD-48) based on the most recent performance test;
- C = the monthly amount of VOC emissions from inside bake oven (ES-47) on Line 6 routed through the regenerative thermal oxidizer (CD-48);
- D = the monthly amount VOC emissions from the clean up solvent usage on Line 6 (ES-F); and
- n = the month (1...12).

Line 6 is also subject to an existing facility-wide PSD emissions cap of 535.2 tons per consecutive 12 months. In addition, Line 6, along with Line 5, is subject to an existing PSD avoidance limit of 185.9 tons per consecutive 12 months. The new PSD avoidance limit for Line 6 will be a nested limit within the higher 185.9 tons limit. The applicant has been submitting reports on a semiannual basis demonstrating compliance with this limit and the permit will require reports be submitted every six months to demonstrate compliance.

Rule 3D .0524 – New Source Performance Standards (NSPS)

Line 6 has been subject to NSPS “Subpart WW – Standards of Performance for the Beverage Can Surface Coating Industry” for several years and has demonstrated compliance with the rule that lists the exterior base coating operation, the overvarnish coating operation, and the inside spray coating operation as affected sources. The NSPS rules apply to any affected source that commences construction, modification, or reconstruction after November 26, 1980.

40 CFR 60.492(b) states that no owner or operator shall discharge or cause the discharge of VOC emissions to the atmosphere that exceed the volume-weighted calendar-month average emissions of 3.84 pounds of VOC per gallon of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation. 40 CFR 60.492(c) states that no owner or operator shall discharge or cause the discharge of VOC emissions to the atmosphere that exceed the volume-weighted calendar-month average emissions of 7.43 pounds of VOC per gallon of coating solids from each two-piece can inside spray coating operation. The applicant will comply with these limits through the use of purchased coatings

whose pounds of VOC per gallon of coating solids are below the standards. The coatings used at the facility will not change as the result of this modification and have previously been shown to demonstrate compliance with the NSPS limits. All of the coatings at the facility are applied "as purchased" without the addition of any other solvents. The use of these coatings demonstrates compliance with these standards. The Supplementary Information to NSPS Subpart WW states "[i]f each coating used at an affected facility during a calendar month has a VOC content equal to or less than the emission limitations prescribed in the standards, and no VOC solvents are added during distribution and application of the coatings, the affected facility is in compliance and calculation of the volume-weighted average VOC content is not required." The permit requires the facility to keep records of the coatings used and any additions to them as purchased before they are applied.

Rule 3D .0614 and 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

The RTO on Line 6 is currently subject to CAM and those conditions will remain in permit as part of this modification. Inspections and Annual Compliance Certifications received from the applicant document compliance with the CAM plan.

Rule 3D .0515 - Particulates from miscellaneous industrial processes

The inside spray machines (ES-46), inside bake oven (ES-47), and the regenerative thermal oxidizer (CD-48) are subject to this rule. ES-47 and CD-48 meet the standard because they combust only natural gas, which inherently meets the allowable limit. No further monitoring, recordkeeping, or reporting is necessary to demonstrate compliance for these sources. The PM rule for ES-46 is in the current permit and will not change as part of this modification. The PM emissions from all of the Inside Spray Machines are well below the allowable limit. The rule is written into the permit with just the equation and no more mention of the compliance given the wide margin of compliance. Previous engineering calculations document compliance with this limit and this will not be affected as a result of this modification.

Rule 3D .0516 - Sulfur dioxide emissions from combustion sources

This rule is currently in the permit and will not change as a result of this modification. The combustion of only natural gas in each of these emission sources assures compliance with this requirement because this fuel inherently complies with this requirement. Therefore no monitoring, recordkeeping, or reporting will be required to demonstrate compliance.

Rule 3D .0521 - Control of visible emissions

Emissions from the printer oven (ES-44), inside spray machines (ES-46), inside bake oven (ES-47) and the RTO (CD-48) are subject to the 20% opacity standard in this rule. The applicant has demonstrated compliance with this limit in the past and it is expected that they will continue to demonstrate compliance in the future. The permit conditions requiring a daily observation of the visible emissions from this equipment remains unchanged in the modified permit.

Rule 3D .0958 – Work Practices for Sources of Volatile Organic Compounds

The equipment on Line 6 has been subject to the VOC work practice standards prior to this modification and has demonstrated compliance with the weekly monitoring and recordkeeping requirements as well as the semiannual reporting requirements outlined in their operating permit. The existing and new equipment will also be subject to the work practice standards. These permit conditions will remain unchanged in the modified permit and it is expected that the applicant will continue to demonstrate compliance with these standards.

Rule 3Q .0700 – Toxic Air Pollutant Procedures (Locally enforceable only)

No new air toxics will be emitted as a result of this modification so a Toxic Air Pollutant (TAP) review is not required. The facility went through a TAP review in the past and emissions of

formaldehyde were modeled. A limit of 2.63 pounds per hour is included in the permit. However, it has since come to light that most of these emissions were from cured formaldehyde for which the U.S. EPA does not have a test method. The applicant had asked in the past that only free formaldehyde be used to determine emissions and provided information from the Federal Register for the MACT (Can Coating) rule and the EPA's approach in dealing with "cured volatiles". This Office concurred with their request that only free formaldehyde emissions are to be reviewed in a letter dated August 29, 2016. The limit can remain in the permit but will never be approached given the current operation and only looking at free formaldehyde emissions.

OTHER PERMITTING ISSUES TO CONSIDER

In addition to the applicable regulations cited above, the following regulations were reviewed to determine if they are applicable as a result of this modification:

Rule 3D .1111 and 40 CFR Part 63 – National Emissions for Hazardous Air Pollutants

This facility is not subject to any MACT standards. A federal standard, Subpart KKKK – National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Metal Cans, was promulgated on November 13, 2003 which lists equipment in operation at Ardagh Metal Beverage USA, Inc. as an affected source. This facility would be subject to this standard if the potential emissions of the highest individual HAP are greater than 10 tons per year or if the combined HAPs at the facility are greater than 25 tons per year.

The primary constituent of the coating used on the inside spray machines is butyl cellulose (aka ethylene glycol butyl ether or EGBE). However, this compound was delisted (Federal Register/Vol. 69, No. 228/Monday, November 29, 2004) as a hazardous air pollutant (HAP). Since this compound has been delisted, the facility is a minor source for HAPs (individual potential HAPs less than 10 tons per year and combined HAPs less than 25 tons per year) and will not be subject to this MACT. It is expected, based on prior reports, that the facility will remain below these HAP levels.

Administrative changes to the operating permit as a result of this modification:

1. Changed the Header on each page to reflect the new permit number (00682-TV-17) along with the new effective date. The permit is being renewed concurrent with this modification.
2. Removed the section entitled "OPERATING CONDITIONS NOT COVERED UNDER THE PERMIT SHIELD" in Section 1 of the permit. This section listed previous modifications to the permit that did not go through a public comment period and thus, were not covered by the permit shield. This section is no longer necessary because the modification is being processed as a Significant Modification and concurrent with the renewal of the permit, which requires a public comment period and U.S. EPA review. Therefore, the unshielded portions of the existing permit are open for comment and will be covered under the permit shield once it is issued. The Table, listing the non-shielded equipment, being removed is below:

Emission Source ID #	Emission Source Description	Unshielded Operating Condition(s)	Date of Modification
ES-23 and ES-24,	Lines 3 and 4 Can Printers,	No specific conditions are unshielded, just the modified equipment itself.	December 12, 2012
ES-08 and ES-09,	Lines 3 and 4 Printer Ovens,		
ES-19, and	Line 3 and 4 Inside Spray Machines, and		
ES-13	Line 3 and 4 Inside Bake Oven		

4. Revised the PSD avoidance limit in Table 3.1 and in permit condition **3.1(E)** to reflect the new limit of 103.4 tons per year for VOC emissions.
5. Added Part II to the permit for the Line 6 Modification Project. The Line 2 Inside Spray Machines Project has been removed because the facility did not go through with this modification. The Lines 3 and 4 Efficiency Project has been removed because the work has been completed and the equipment is operational. The equipment associated with this project is open for public comment and will be covered under the permit shield when the permit is issued.

Agency Reviewer:

Date:

Agency Q/A Manager:

Date: