MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

October 17, 2024

PERMIT TO INSTALL 3-24A

ISSUED TOMichigan Can Lines

LOCATED AT 500 Packard Highway Charlotte, Michigan 48813

IN THE COUNTY OF Eaton

STATE REGISTRATION NUMBER B1592

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: September 25, 2024				
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:			
October 17, 2024				
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD Air Quality Division

BACT Best Available Control Technology

CAA Clean Air Act

CAM Compliance Assurance Monitoring
CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

COMS Continuous Opacity Monitoring System

Department/department/EGLE Michigan Department of Environment, Great Lakes, and Energy

EU Emission Unit FG Flexible Group

GACS Gallons of Applied Coating Solids

GC General Condition
GHGs Greenhouse Gases

HVLP High Volume Low Pressure*

ID Identification

IRSLInitial Risk Screening LevelITSLInitial Threshold Screening LevelLAERLowest Achievable Emission RateMACTMaximum Achievable Control TechnologyMAERSMichigan Air Emissions Reporting System

MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emission Standard for Hazardous Air Pollutants

NSPS New Source Performance Standards

NSR New Source Review
PS Performance Specification

PSD Prevention of Significant Deterioration

PTE Permanent Total Enclosure

PTI Permit to Install

RACT Reasonable Available Control Technology

ROP Renewable Operating Permit

SC Special Condition

SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction

SRN State Registration Number

TBD To Be Determined

TEQ Toxicity Equivalence Quotient

USEPA/EPA United States Environmental Protection Agency

VE Visible Emissions

^{*}For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm Actual cubic feet per minute

BTU British Thermal Unit °C Degrees Celsius CO Carbon Monoxide

CO2e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter Pegrees Fahrenheit

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

HP Horsepower Hydrogen Sulfide

kW Kilowatt
lb Pound
m Meter
mg Milligram
mm Millimeter
MM Million
MW Megawatts

NMOC Non-Methane Organic Compounds

NO_x Oxides of Nitrogen

ng Nanogram

PM Particulate Matter

PM10 Particulate Matter equal to or less than 10 microns in diameter PM2.5 Particulate Matter equal to or less than 2.5 microns in diameter

pph Pounds per hour ppm Parts per million

ppmv Parts per million by volume ppmw Parts per million by weight

psia Pounds per square inch absolute psig Pounds per square inch gauge

scf Standard cubic feet

sec Seconds SO₂ Sulfur Dioxide

TAC Toxic Air Contaminant

Temp Temperature

THC Total Hydrocarbons tpy Tons per year Microgram

µm Micrometer or Micron
VOC Volatile Organic Compounds

yr Year

GENERAL CONDITIONS

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

	Emission Unit Description	Installation	
	(Including Process Equipment & Control	Date /	Flexible Group
Emission Unit ID	Device(s))	Modification Date	ID
EUCANLINE1	Beverage can production line where aluminum is first uncoiled and shaped. The shaped cans are then sent to the washer to remove lubricant residue. The washed cans are dried in a dryoff oven prior to ink application using a decorator (2 per line). The decorated cans are placed in a pin oven (2 per line) to cure the coatings. Next, the cans are sent to an internal coating machine (12 per line) to coat the inside. Coated cans are cured in an internal bake oven. The fully coated cans are sent to the necker to shape the top of the can, then sent to palletizer and either stored in the warehouse or prepared to ship. Acetone will be used for miscellaneous clean up activities including equipment wipe-down and changing ink colors.	TBD	FGCANLINES FGNSPSWW
EUCANLINE2	Beverage can production line where aluminum is first uncoiled and shaped. The shaped cans are then sent to the washer to remove lubricant residue. The washed cans are dried in a dry-off oven prior to ink application using a decorator (2 per line). The decorated cans are placed in a pin oven (2 per line) to cure the coatings. Next, the cans are sent to an internal coating machine (12 per line) to coat the inside. Coated cans are cured in an internal bake oven. The fully coated cans are sent to the necker to shape the top of the can, then sent to palletizer and either stored in the warehouse or prepared to ship. Acetone will be used for miscellaneous clean up activities including equipment wipe-down and changing ink colors.	TBD	FGCANLINES FGNSPSWW
EUDIESEL	Compression ignition (CI) internal combustion engine (ICE) for emergency purposes with a maximum engine power less than or equal to 1,053 kilowatt (KW) (1,412 horsepower (HP)) manufactured after April 1, 2006, subject to 40 CFR Part 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The engine generator is used to provide backup power during emergencies and will be operated for routine maintenance checks and readiness testing.	TBD	NA

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUBOILER1	Hot water boiler with a capacity of no more than 6 MMBtu/hr.	TBD	FGNATURALGAS
EUBOILER2	Hot water boiler with a capacity of no more than 6 MMBtu/hr.	TBD	FGNATURALGAS
EUBOILER3	Hot water boiler with a capacity of no more than 6 MMBtu/hr.	TBD	FGNATURALGAS
EUBOILER4	Hot water boiler with a capacity of no more than 6 MMBtu/hr.	TBD	FGNATURALGAS
EUBOILER5	Hot water boiler with a capacity of no more than 6 MMBtu/hr.	TBD	FGNATURALGAS
EUBOILER6	Hot water boiler with a capacity of no more than 6 MMBtu/hr.	TBD	FGNATURALGAS
EUSPACEHEATERS	Space heaters with a total capacity of up to 10 MMBtu/hr.	TBD	FGNATURALGAS
EUFIREPUMP	Compression ignition (CI) internal combustion engine (ICE) for emergency purposes with a maximum engine power less than or equal to 131 kilowatt (KW) (175 horsepower (HP)) manufactured after April 1, 2006, subject to 40 CFR Part 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The engine generator is used to provide backup power to fire suppression systems during emergencies and will be operated for routine maintenance checks and readiness testing.	TBD	NA

EUDIESEL EMISSION UNIT CONDITIONS

DESCRIPTION

Compression ignition (CI) internal combustion engine (ICE) for emergency purposes with a maximum engine power less than or equal to 1,053 kilowatt (kW) (1,412 horsepower (HP)) manufactured after April 1, 2006, subject to 40 CFR Part 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The engine generator is used to provide backup power during emergencies and will be operated for routine maintenance checks and readiness testing.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. NMHC+NOx	6.4 g/kW-hr	Hourly ^A	EUDIESEL	SC V.1,	40 CFR 60.4205(b)
	_			SC VI.2,	and Table 2 to
				SC VI.3	Appendix I of Part
					1039,
					40 CFR 60.4211
2. CO	3.5 g/kW-hr	Hourly ^A	EUDIESEL	SC V.1,	40 CFR 60.4205(b)
				SC VI.2,	and Table 2 to
				SC VI.3	Appendix I of Part
					1039,
					40 CFR 60.4211
3. PM	0.2 g/kW-hr	Hourly ^A	EUDIESEL	SC V.1,	40 CFR 60.4205(b)
		-		SC VI.2,	and Table 2 to
				SC VI.3	Appendix I of Part
					1039,
					40 CFR 60.4211

AThese emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c).

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in EUDIESEL with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 CFR 60.4207, 40 CFR 1090.305)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUDIESEL for more than 500 hours per year based on a 12-month rolling time period as determined at the end of each calendar month. The 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2. (R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))
- 2. The permittee may operate EUDIESEL for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent

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balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. (40 CFR 60.4211(f)(2))

- 3. The permittee may operate EUDIESEL up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted as part of the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4211(f)(2). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 60.4211(f)(3))
- 4. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60, Subpart IIII, for the same model year, the permittee shall meet the following requirements for EUDIESEL.
 - a) Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
 - b) Change only those emission-related settings that are permitted by the manufacturer, and
 - c) Meet the requirements as specified in 40 CFR 1068, as they apply to the engine.

If you do not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine. (40 CFR 60.4211(a) & (c))

5. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for EUDIESEL and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 60.4211(g)(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip and maintain EUDIESEL with a non-resettable hours meter to track the operating hours. (R 336.1225, 40 CFR 60.4209)
- 2. The maximum rated power output of EUDIESEL shall not exceed 1,053 kW (1,412 HP) as certified by the equipment manufacturer. (R 336.1225, R 336.1702(a), 40 CFR 60.4202, 40 CFR 60.4205, 40 CFR 1039, 40 CFR 1042)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. If EUDIESEL is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - a) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.
 - b) If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.
 - c) Conduct subsequent performance testing every 8,760 hours of engine operation or every 3 years thereafter, whichever comes first, to demonstrate compliance with the applicable emission standards.

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No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (40 CFR 60.4211(g)(3), 40 CFR 60.4212)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1225, 40 CFR 52.21 (c) & (d), 40 CFR Part 60, Subpart IIII)
- 2. The permittee shall keep, in a satisfactory manner, the following records for EUDIESEL:
 - a) For a certified engine: The permittee shall keep records of the manufacturer certification documentation.
 - b) For an uncertified engine: The permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

- 3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUDIESEL:
 - a) For a certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.4.
 - b) For an uncertified engine: The permittee shall keep records of a maintenance plan, as required by SC III.5, and maintenance activities.

The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

- 4. The permittee shall monitor and record, the total hours of operation for EUDIESEL on a monthly and 12-month rolling time period basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for EUDIESEL, on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUDIESEL, including what classified the operation as emergency and how many hours are spent for non-emergency operation. (40 CFR 60.4211, 40 CFR 60.4214)
- 5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUDIESEL, demonstrating that the fuel meets the requirement of 40 CFR 1090.305. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. (40 CFR 60.4207(b), 40 CFR 1090.305)

VII. REPORTING

- 1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUDIESEL. (R 336.1201(7)(a))
- 2. The permittee shall submit a notification specifying whether EUDIESEL will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation. (40 CFR Part 60, Subpart IIII)

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust	Minimum Height	Underlying
	Diameter / Dimensions	Above Ground	Applicable
	(inches)	(feet)	Requirements
1. SVEGS27_D	12	10	40 CFR 52.21 (c) & (d) R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and IIII, as they apply to EUDIESEL. (40 CFR Part 60, Subparts A & IIII, 40 CFR 63.6590(c))

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

EUFIREPUMP EMISSION UNIT CONDITIONS

DESCRIPTION

Compression ignition (CI) internal combustion engine (ICE) for emergency purposes with a maximum engine power less than or equal to 131 kilowatt (KW) (175 horsepower (HP)) manufactured after April 1, 2006, subject to 40 CFR Part 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The engine generator is used to provide backup power to fire suppression systems during emergencies and will be operated for routine maintenance checks and readiness testing.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. NMHC+NOx	4.0 g/kW-hr	Hourly ^A	EUFIREPUMP	SC V.1	40 CFR 60.4205(c)
		-		SC VI.2	and Table 4,
				SC VI.3	40 CFR 60.4211
2. CO	3.5 g/kW-hr	Hourly ^A	EUFIREPUMP	SC V.1	40 CFR 60.4205(c)
	_	-		SC VI.2	and Table 4,
				SC VI.3	40 CFR 60.4211
3. PM	0.2 g/kW-hr	Hourly ^A	EUFIREPUMP	SC V.1	40 CFR 60.4205(c)
				SC VI.2	and Table 4,
				SC VI.3	40 CFR 60.4211

AThese emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c).

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in EUFIREPUMP with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 CFR 60.4207, 40 CFR 1090.305)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUFIREPUMP for more than 500 hours per year based on a 12-month rolling time period as determined at the end of each calendar month. The 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2. (R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))
- 2. The permittee may operate EUFIREPUMP for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. (40 CFR 60.4211(f)(2))

3. The permittee may operate EUFIREPUMP up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted as part of the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4211(f)(2). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 60.4211(f)(3))

- 4. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60, Subpart IIII, for the same model year, the permittee shall meet the following requirements for EUFIREPUMP.
 - a) Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
 - b) Change only those emission-related settings that are permitted by the manufacturer, and
 - c) Meet the requirements as specified in 40 CFR 1068, as they apply to the engine.

If you do not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine. (40 CFR 60.4211(a) & (c))

5. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for EUFIREPUMP and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 60.4211(g)(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip and maintain EUFIREPUMP with a non-resettable hours meter to track the operating hours. (R 336.1225, 40 CFR 60.4209)
- The maximum rated power output of EUFIREPUMP shall not exceed 131 kW (175 HP), as certified by the equipment manufacturer. (R 336.1225, R 336.1702(a), 40 CFR 60.4202, 40 CFR 60.4205, 40 CFR 1039, 40 CFR 1042)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. If EUFIREPUMP is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - a) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.
 - b) If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.

No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (40 CFR 60.4211(g)(2), 40 CFR 60.4212)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any

monitoring/recordkeeping special condition. (R 336.1225, 40 CFR 52.21 (c) & (d), 40 CFR Part 60, Subpart IIII)

- 2. The permittee shall keep, in a satisfactory manner, the following records for EUFIREPUMP:
 - a) For a certified engine: The permittee shall keep records of the manufacturer certification documentation.
 - b) For an uncertified engine: The permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

- 3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUFIREPUMP:
 - a) For a certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.4.
 - b) For an uncertified engine: The permittee shall keep records of a maintenance plan, as required by SC III.5, and maintenance activities.

The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

- 4. The permittee shall monitor and record, the total hours of operation for EUFIREPUMP on a monthly and 12-month rolling time period basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for EUFIREPUMP, on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUFIREPUMP, including what classified the operation as emergency and how many hours are spent for non-emergency operation. (40 CFR 60.4211, 40 CFR 60.4214)
- 5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUFIREPUMP, demonstrating that the fuel meets the requirement of 40 CFR 1090.305. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. (40 CFR 60.4207(b), 40 CFR 1090.305)

VII. REPORTING

- 1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUFIREPUMP. (R 336.1201(7)(a))
- 2. The permittee shall submit a notification specifying whether EUFIREPUMP will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation. **(40 CFR Part 60, Subpart IIII)**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFPS26	6	53	40 CFR 52.21 (c) & (d) R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and IIII, as they apply to EUFIREPUMP. (40 CFR Part 60, Subparts A & IIII, 40 CFR 63.6590(c))

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

EUCANLINE1 EMISSION UNIT CONDITIONS

DESCRIPTION

Beverage can production line where aluminum is first uncoiled and shaped. The shaped cans are then sent to the washer to remove lubricant residue. The washed cans are dried in a dry-off oven prior to ink application using a decorator (2 per line). The decorated cans are placed in a pin oven (2 per line) to cure the coatings. Next, the cans are sent to an internal coating machine (12 per line) to coat the inside. Coated cans are cured in an internal bake oven. The fully coated cans are sent to the necker to shape the top of the can, then sent to palletizer and either stored in the warehouse or prepared to ship. Acetone will be used for miscellaneous clean up activities including equipment wipe-down and changing ink colors.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO), Permanent Total Enclosure (PTE), and baghouse.

I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	87.4 tpy	12-month rolling time period as determined at the end of each calendar month	EUCANLINE1	SC VI.5	R 336.1205 R 336.1702(a)
2. Acetone	10 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUCANLINE1	SC VI.7	R 336.1224 R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUCANLINE1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the RTO and baghouse has been submitted and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District

Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

- 2. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702(a))
- 3. The permittee shall handle all VOC and / or HAP containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1225, R 336.1702(a))
- 4. The permittee shall either maintain a minimum of 0.007 inches of water pressure differential between the PTE and the adjacent area on a 3-hour block average basis or maintain a facial velocity of 200 feet per minute though each natural draft opening of the PTE on a 3-hour block average basis. (R 336.1702(a), R 336.1910)

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

- 1. The permittee shall not operate EUCANLINE1 unless the regenerative thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the regenerative thermal oxidizer includes a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1400 °F, a minimum retention time of 0.5 seconds. (R 336.1225, R 336.1702, R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature, on a continuous basis, during operation of EUCANLINE1. (R 336.1225, R 336.1702)
- 3. The permittee shall not operate EUCANLINE1 unless the PTE is installed, maintained and operated in a satisfactory manner as specified in SC III.4. Satisfactory operation requires the following:
 - a) The direction of the air flow at all times must be into the enclosure; and either
 - b) The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or
 - c) The pressure drop across the enclosure must be at least 0.007 inch H_2O . (R 336.1702(a), R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall determine the VOC content, water content, and density of any material as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)
- 2. Within 180 days after commencement of trial operation of EUCANLINE1, and at least once every 5 years thereafter, the permittee shall verify destruction efficiency of the regenerative thermal oxidizer by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR 60 Appendix A for destruction efficiency. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1225, R 336.1702(a))
- The permittee shall continuously monitor and record the temperature in the combustion chamber of the regenerative thermal oxidizer during operation of EUCANLINE1. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 4. The permittee shall properly maintain the temperature monitoring system including keeping necessary parts for routine repairs of the monitoring equipment. The permittee shall keep records of all maintenance activities according to the MAP, SC III.1, for the monitoring system on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 5. The permittee shall keep the following information on a calendar month basis for EUCANLINE1:
 - a) Gallons or pounds of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c) The VOC content, in pounds per gallon or percent by weight, of each material used.
 - d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC emission calculations determining the cumulative emission rate during the first 12-months and the annual emission rate thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

(R 336.1225, R 336.1702(a))

- 6. The permittee shall keep, in a satisfactory manner, a log of all RTO maintenance and repair activities. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)
- 7. The permittee shall keep the following information on a calendar month basis for EUCANLINE1:
 - a) The amount in pounds of acetone used, recovered, and reclaimed.
 - b) Acetone emission calculations determining the monthly emission rate in tons per calendar month.
 - c) Acetone emission calculations determining the cumulative emission rate during the first 12-months and the annual emission rate thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1224, R 336.1225)

- 8. For the RTO, while in operation during production, the permittee shall conduct bypass monitoring for each bypass valve such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass was open shall be kept on file and made available to the Department upon request. (R 336.1702, R 336.1910)
- 9. The permittee shall keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for the RTO control device used to demonstrate compliance with the applicable VOC emission limits:

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- a) Validation of thermocouple accuracy or recalibration of each temperature thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
- b) Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.
- Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.

The requirement to address these items is also satisfied if a destruction efficiency test has been performed on the control device within the prior 18-month period. All records shall be kept on file and made available to the Department upon request. (R 336.1910, R 336.1911)

- 10. The permittee shall monitor and record, in a satisfactory manner, the following:
 - a) The direction of air flow into the PTE at all times; and either
 - b) The facial velocity of air flow through all natural draft openings above the facial velocity limit; or
 - c) The pressure drop at or above the pressure drop limit.

Data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep records of the 3-hour block average of the facial velocity or pressure drop. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702)

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUCANLINE1. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVRTOS11	68	53	R 336.1225, 40 CFR 52.21(c) & (d)
2.	SVWAS11 (washer stack for EUCANLINE1)	14	53	R 336.1225, 40 CFR 52.21(c) & (d)
3.	SVWAS15 (dry-off oven stack for EUCANLINE1)	10	53	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

- 1. Upon installation of EUCANLINE2, the permittee shall meet the requirements of FGCANLINES. (R 336.1201(3))
- 2. The permittee shall comply with all applicable provisions of the New Source Performance Standards as specified in 40 CFR Part 60, Subparts A and WW for the Beverage Can Surface Coating Industry. (40 CFR Part 60, Subparts A & WW)

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCANLINES	This flexible group covers the operation of equipment used for the shaping, surface preparation, and decoration of beverage cans at two (2) production lines, EUCANLINE1 and EUCANLINE2.	EUCANLINE1 EUCANLINE2
FGNSPSWW	FGNSPSWW is subject to the requirements of Standard of Performance for the Beverage Can Surface Coating Industry for which construction, modification, or reconstruction commenced after November 26, 1980.	EUCANLINE1 EUCANLINE2
FGNATURALGAS	Collection of natural gas-fired equipment with a combined maximum heat input capacity of 46 MMBtu/hr.	EUBOILER1 EUBOILER2 EUBOILER3 EUBOILER4 EUBOILER5 EUBOILER6 EUSPACEHEATERS

FGCANLINES FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group covers the operation of equipment used for the shaping, surface preparation, and decoration of beverage cans at two (2) production lines, EUCANLINE1 and EUCANLINE2.

Emission Unit: EUCANLINE1, EUCANLINE2

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO), Permanent Total Enclosure (PTE) and baghouse. A concentrator will be utilized on EUCANLINE2.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1. VOC	87.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGCANLINES	SC VI.5	R 336.1205 R 336.1702(a)
2. Acetone	10 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGCANLINES	SC VI.8	R 336.1224 R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate FGCANLINES unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the RTO, baghouse, and concentrator has been submitted, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for guick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the

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MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

- 2. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702(a))
- 3. The permittee shall handle all VOC and / or HAP containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1225, R 336.1702(a))
- 4. The permittee shall either maintain a minimum of 0.007 inches of water pressure differential between the PTE and the adjacent area on a 3-hour block average basis or maintain a facial velocity of 200 feet per minute though each natural draft opening of the PTE on a 3-hour block average basis. (R 336.1702(a), R 336.1910)

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

- 1. The permittee shall not operate FGCANLINES unless the regenerative thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the regenerative thermal oxidizer includes a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1400 °F, a minimum retention time of 0.5 seconds. (R 336.1225, R 336.1702, R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature, on a continuous basis, during operation of FGCANLINES. (R 336.1225, R 336.1702)
- 3. The permittee shall not operate FGCANLINES unless the concentrator is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the concentrator includes maintaining the temperature according to manufacturer's specifications. Upon performance testing, satisfactory operation includes maintaining the concentrator temperature within 15 °F of the most recent acceptable performance test. (R 336.1225, R 336.1702, R 336.1910)
- 4. The permittee shall not operate FGCANLINES unless the PTE is installed, maintained and operated in a satisfactory manner as specified in SC III.4. Satisfactory operation requires the following:
 - a) The direction of the air flow at all times must be into the enclosure; and either
 - b) The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or
 - c) The pressure drop across the enclosure must be at least 0.007 inch H_2O .

(R 336.1702(a), R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall determine the VOC content, water content, and density of any material as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)
- 2. Within 180 days after commencement of trial operation of EUCANLINE2, and at least once every 5 years thereafter, the permittee shall verify the removal efficiency of the concentrator, and destruction efficiency of the regenerative thermal oxidizer. by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR 60 Appendix A for destruction efficiency. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical

Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1225, R 336.1702(a))
- The permittee shall continuously monitor and record the temperature in the combustion chamber of the regenerative thermal oxidizer during operation of FGCANLINES. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 3. The permittee shall continuously monitor and record the desorption gas inlet temperature of the concentrator during operation of FGCANLINES. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 5. The permittee shall properly maintain the temperature monitoring system including keeping necessary parts for routine repairs of the monitoring equipment. The permittee shall keep records of all maintenance activities according to the MAP, SC III.1, for the monitoring system on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 6. The permittee shall keep the following information on a calendar month basis for FGCANLINES:
 - a) Gallons or pounds of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c) The VOC content, in pounds per gallon or percent by weight, of each material used.
 - d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC emission calculations determining the cumulative emission rate during the first 12-months and the annual emission rate thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

(R 336.1225, R 336.1702(a))

- 7. The permittee shall keep, in a satisfactory manner, a log of all RTO maintenance, and repair activities. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)
- 8. The permittee shall keep the following information on a calendar month basis for FGCANLINES:
 - a) The amount in pounds of acetone used, recovered, and reclaimed.
 - b) Acetone emission calculations determining the monthly emission rate in tons per calendar month.
 - c) Acetone emission calculations determining the cumulative emission rate during the first 12-months and the annual emission rate thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1224, R 336.1225)

- 9. For the RTO, while in operation during production, the permittee shall conduct bypass monitoring for each bypass valve such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass was open shall be kept on file and made available to the Department upon request. (R 336.1702, R 336.1910)
- 10. The permittee shall keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for the RTO control device used to demonstrate compliance with the applicable VOC emission limits:
 - a) Validation of thermocouple accuracy or recalibration of each temperature thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
 - b) Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.
 - c) Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.
 - d) Perform quarterly pressure drop readings across the concentrator.

The requirement to address these items is also satisfied if a destruction efficiency test has been performed on the control device within the prior 18-month period. All records shall be kept on file and made available to the Department upon request. (R 336.1910, R 336.1911)

- 11. The permittee shall monitor and record, in a satisfactory manner, the following:
 - a) The direction of air flow into the PTE at all times; and either
 - b) The facial velocity of air flow through all natural draft openings at or above the facial velocity limit; or
 - c) The pressure drop at or above the pressure drop limit.

Data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep records of the 3-hour block average of the facial velocity or pressure drop. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702)

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUCANLINE2. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

St	tack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVR	RTOS11	68	53	R 336.1225, 40 CFR 52.21(c) & (d)
	VAS11 (washer k for EUCANLINE1)	14	53	R 336.1225, 40 CFR 52.21(c) & (d)
	VAS21 (washer k for EUCANLINE2)	14	53	R 336.1225, 40 CFR 52.21(c) & (d)
	VAS15 (dry-off oven	10	53	R 336.1225, 40 CFR 52.21(c) & (d)
	VAS25 (dry-off oven k for EUCANLINE2)	10	53	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the New Source Performance Standards as specified in 40 CFR Part 60, Subparts A and WW for the Beverage Can Surface Coating Industry. (40 CFR Part 60, Subparts A & WW)

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FGNSPSWW FLEXIBLE GROUP CONDITIONS

DESCRIPTION

FGNSPSWW is subject to the requirements of Standard of Performance for the Beverage Can Surface Coating Industry for which construction, modification, or reconstruction commenced after November 26, 1980.

Emission Unit: EUCANLINE1, EUCANLINE2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1. VOC	3.8 lbs of VOC per gallon of coating solids	Volume-weighted calendar month average emissions	Each two-piece can clear base coating operation and from each overvarnish coating operation	SC V.1 SC VI.1	40 CFR 60.492(b)
2. VOC	7.4 lbs of VOC per gallon of coating solids	Volume-weighted calendar month average emissions	Each two-piece can inside spray coating operation	SC V.1 SC VI.1	40 CFR 60.492(c)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall conduct an initial performance test as required under 40 CFR 60.8(a) and thereafter a performance test each calendar month for each affected facility. The permittee shall perform the compliance demonstrations in accordance with 40 CFR 60.493(b). (40 CFR 60.493(b))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep all records as required by 40 CFR 60.495(d). (40 CFR 60.495(d))

VII. REPORTING

- 1. The permittee shall include the data specified in 40 CFR 60.495(a) in the initial compliance report required under 40 CFR 60.8(a) for each affected facility. (40 CFR 60.495(a))
- Following the initial performance test, the permittee shall identify, record, and submit quarterly reports to the
 Department of each instance in which the volume-weighted average of the total mass of VOC per volume of
 coating solids is greater than the limit specified under 40 CFR 60.492. If no such instances occur during a
 particular quarter, a report stating this shall be submitted to the Department semiannually. (40 CFR 60.495(b))

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the New Source Performance Standards as specified in 40 CFR Part 60, Subparts A and WW for the Beverage Can Surface Coating Industry. (40 CFR Part 60, Subparts A & WW)

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FGNATURALGAS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Collection of natural gas-fired space heaters and boilers with a combined heat input capacity of 46 MMBtu/hr.

Emission Units: EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4, EUBOILER5, EUBOILER6, EUSPACEHEATERS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only natural gas in FGNATURALGAS. (R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21 (c) and (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The heat input capacity of FGNATURALGAS shall not exceed 46 MMBTU per hour. (R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d))
- 2. The heat input capacity of EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4, EUBOILER5, and EUBOILER6 individually shall not exceed 6 MMBTU per hour. (R 336.1205)

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

Stacl	k & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
ÈUBO	/HS11 DILER1, IILER2, IILER3)	14	53	R 336.1225, 40 CFR 52.21(c) & (d)
ÈUBO	/HS21 DILER4, ILER5, ILER6)	14	53	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1. VOC	Less than 89.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Individual HAP	Less than 8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)
3. Aggregate HAPs	Less than 22.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall determine the HAP content of any material, as received and as applied, using manufacturer's formulation data. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))
- 2. The permittee shall determine the VOC content, water content, and density of any material as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the

permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1205(3))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3))
- 2. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
 - a) Gallons or pounds of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c) The VOC content, in pounds per gallon or percent by weight, of each material used.
 - d) VOC emission calculations determining the monthly emission rate in pounds per calendar month.
 - e) VOC emission calculations determining the cumulative emission rate during the first 12-months and the annual emission rate thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205(3))
- 3. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
 - a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or percent by weight, of each HAP containing material used.
 - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - e) Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205(3))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).