Bay Area Air Quality Management District

375 Beale Street, Suite 600
San Francisco, CA 94105
(415) 749-5000

Permit Evaluation
and
Statement of Basis
For
MINOR PERMIT REVISION of

MAJOR FACILITY REVIEW PERMIT

for

Ball Metal Beverage Container Corporation
Facility #A0148

Facility Address:
2400 Huntington Drive
Fairfield, CA 94533

Mailing Address:
9300 West 108th Circle
Broomfield, CO 80021

August 2016

Application Engineer: Alfonso Borja
Site Engineer: Alfonso Borja

Title V Renewal Applications: 26968 and 27702
NSR Applications Included: 26587, 26660, and 27296

TABLE OF CONTENTS

Title V Statement of Basis
Ball Metal Beverage Container Corporation, PLANT # A0148
APPLICATION #'s 26968 and 27702

A. BACKGROUND

Ball Metal Beverage Container Corporation (BMBC) is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant, precursor organic compounds (POC), and is therefore required to obtain and operate under a Major Facility Review/Title V permit pursuant to District Regulation 2-6-304.

Major Facility Operating Permits (Title V permits) must meet the requirements of 40 CFR Part 70, as specified in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility number that consists of a letter and a 4-digit number. This facility number is also considered to be the identifier for the permit. The identifier for this facility is A0148.

This facility received its initial Title V permit on July 28, 1999. The permit was renewed on December 13, 2006 and January 27, 2015.

Pursuant to BAAQMD Regulation 2, Rule 6, Section 414, the District is proposing a minor permit revision, as defined in BAAQMD Regulation 2, Rule 6, Section 215, to the Major Facility Review permit to incorporate permit condition changes approved in New Source Review (NSR) Application Numbers 26587, 26660, and 27296.

The District is proposing a minor permit revision of the Major Facility Review permit, with all changes to the permit, since the last renewal, identified in strikeout/underline format. These changes are discussed in this Statement of Basis. The Statements of Basis for prior issued Major Facility Review permits are incorporated by reference and are available upon request.

B. FACILITY DESCRIPTION

Ball Corporation owns and operates the Ball Metal Beverage Container Corporation (Facility Site #A0148), located in Fairfield, CA. This facility has been in operation at this location since 1976 and produces 2-piece aluminum cans. There are three can manufacturing lines operated at the

facility, consisting of forming equipment, printers, coaters, spray coaters, curing ovens, and washing operations. The facility operates baghouses to abate particulate emissions from the spray coating lines and a regenerative thermal oxidizer (RTO) to abate the volatile organic compound emissions from the coating operations, which are emitted from the curing ovens.

Cans are formed and trimmed from coiled aluminum sheet at the Draw and Iron (D&I) machines. The formed cans are conveyed from the D&I machines to can washers; the D&I and washing equipment are exempt from District permit requirements. After washing, a basecoat is applied to some cans, and these cans are sent to an oven to cure the basecoat before printing inks are applied. All cans go through printing, then an overvarnish is applied, and the cans are again cured at an oven. A protective interior coating is then sprayed on the interior of the cans, an identification code is printed on the bottoms of the cans, and they are cured a final time at bake ovens prior to undergoing a neck and flange forming process. After final inspection, the cans are palletized for shipping. There is one end press operated at the facility which forms can ends from coiled sheet aluminum, and an end sealing compound is applied to the perimeters of the can ends. The can end forming and end sealing compound application are exempt from District permit requirements.

A more complete description of the operation is available in the Statement of Basis for the renewal of the Major Facility Review permit performed on January 27, 2015.

Emissions

The main air emissions at this facility are volatile organic compounds (VOC) from application of coatings at the can manufacturing lines. These VOC emissions include certain toxic air contaminant (TAC) and hazardous air pollutant (HAP) emissions, including formaldehyde, glycol ethers, methanol, and xylene. The VOC emissions from the can coating lines are subject to federal and local regulations which limit the VOC content of applied coatings. The facility currently applies only compliant coatings that meet the VOC content limits in both the federal and District regulations. However, both the federal and local regulations allow the facility the option to apply coatings with higher VOC contents, as long as the emissions to the atmosphere are controlled to a level equivalent to the application of compliant coatings. To apply "non-compliant coatings," District Regulation 8, Rule 11 requires the facility to submit a proposed alternate emission control plan for review and approval on an annual basis.

The facility is also subject to District permit conditions limiting VOC emissions from specified coating lines. To meet these emission limits, the facility operates a RTO which abates the fraction of VOC emissions emanating from the curing ovens associated with all 3 can coating lines. The RTO destroys most of the organic compounds and TACs/HAPs from the coating emissions, but is also a source of emissions itself, since it produces secondary combustion pollutants, including nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), and sulfur dioxide (SO_2), from combustion of the organic compounds and natural gas. Use of the RTO is not required to comply with the VOC limits in federal or District regulations at this time, since only compliant coatings are currently being applied. In addition to the RTO, two baghouses are operated to abate PM emissions from the interior coating spray banks.

The storage tanks, cold cleaners, and wipe cleaning operation at the facility also generate VOC emissions. These operations are sources of fugitive VOC emissions and are not abated. Operation of the coating ovens, boilers, emergency diesel generators, and fire pump also result in criteria pollutant and greenhouse gas emissions (GHG) from the combustion of fuel (natural gas and diesel), which are subject to a number of District and state regulations detailed in the permit.

Permitted Emission Changes Since the Last Permit Renewal

Since the Major Facility Review/Title V Permit was renewed in 2015, the District processed the following NSR permit applications for BMBC:

AN 26587 Modify Part 8 of Condition 9904 to establish emission limits for S-4, S-6, S-7, S-51 through S-53, S-55 through S-58, S-60, and S-61 equivalent to the offsets provided in NSR permit application #10569. In addition, S-54 and S-59 have decommissioned and have been removed. Permit to Operate issued 12/16/2014.

AN 26660 Modify Condition 1701, for S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, and S-60, to allow the use of acetone, thus increasing the facility's non-precursor organic compound (NPOC) annual emission rate to 28 tons per year, while allowing the facility to retain existing POC emission limits for the use of isopropyl alcohol (IPA). In addition, the modification removed all references to archived sources, which include S-14, S-15, S-25, S-26, S-41, S-42, S-43, and S-54. In addition, pursuant to Major Facility Review application 23415, S-62 will be referenced within Condition 1701. Permit to Operate issued 2/17/2015.

AN 27296 Modify POC emission limit for S-68 and S-69, from gallon of ink used per year to an annual POC mass emission rate. The NSR application has also provided the facility the ability to use 164 gallons of acetone per year, for a total NPOC potential to emit increase equivalent to 0.544 tons per year. Permit to Operate issued 9/22/2015.

All of the changes associated with these permit actions have been incorporated into this proposed Title V/Major Facility Review permit minor revision.

The emission changes due to these NSR permit applications have been summarized in Table 1 below in tons of pollutant per year (TPY).

Table 1
Site #A0148, Ball Metal Beverage Container, Corp.
Permitted Emission Increases, TPY, Since 2015 Title V Permit Renewal

Application	POC	NO_x	SO_2	CO	PM_{10}	NPOC
26587	None	None	None	None	None	None
26660	None	None	None	None	None	28.000
27296	None	None	None	None	None	0.544

Since there are no increases in POC an TACs, and the only increase was from acetone, which is NPOC and not a TAC, the District concluded that this revision is a minor revision.

C. PERMIT CONTENT

The legal and factual basis for the permit follows. The permit sections are described in the order that they are presented in the permit.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Changes to the Permit, Section I:

- Delete strike-out "939 Ellis Street" and "94109" in *Standard Conditions, Section F "Monitoring Reports."* Enter/underline the District's new address, which is "375 Beale Street, Suite 600" at the zip code "94105."

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S-1). Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Regulation 2-1-302. Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District's regulations.

The permitted sources are listed in Table II-A. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Significant sources are those sources that have a potential to emit of more than 2 tons of a "regulated air pollutant," as defined in BAAQMD Regulation 2-6-222, per year or 400 pounds of a "hazardous air pollutant," as defined in BAAQMD Regulation 2-6-210, per year. 3 significant sources, which are exempt from BAAQMD permitting requirements, have been reported at this facility – natural gas boilers, 2 rated at 6 MMBtu/hour each and 1 rated at 5 MMBtu/hour. These significant sources have been included in a new Table II-C.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A-3). If a source is also an abatement device, such as when an engine controls VOC emissions, it will be listed in the abatement device table but will have an "S" number. An abatement device may also be a source (such as a thermal oxidizer that burns fuel) of secondary emissions. If the primary function of a device is to control emissions, it is considered an abatement (or "A") device. If the primary function of a device is a non-control function, the device is considered to be a source (or "S").

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Changes to the Permit, Section II:

- No changes to this section are currently proposed in this action. The removed sources, archived in NSR permit applications 26587 and 26660, have been accounted for in the 2015 Major Source Review permit renewal.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. Unpermitted sources may, however, be specifically described in a Title V permit if they are considered ***significant sources*** pursuant to the definition in BAAQMD Rule 2-6-239. This facility has reported operation of significant sources, that are exempt from District permit requirements. These significant sources have been included in the permit.

Changes to Permit, Section III:

- Update the date of amendment, adoption, and/or approval for *BAAQMD Regulation 5 "Open Burning."*
- Updated the date of amendment, adoption, and/or approval for *BAAQMD Regulation 8, Rule 2 "Organic Compounds – Miscellaneous Operations."*
- Amend the Federal Enforceable status of *BAAQMD Regulation 12, Rule 4 "Miscellaneous Standards of Performance – Sandblasting."*
- Updated the date of amendment, adoption, and/or approval for *Code of Federal Regulations, Title 40, Part 61, Subpart A "National Emission Standards for Hazardous Air Pollutants – General Provisions."*

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules and Regulations
- SIP Rules (if any) are listed following the corresponding District regulations. SIP rules are District regulations that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are "federally enforceable" and a "Y" (yes) indication will appear in the "Federally Enforceable" column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the "Federally Enforceable" column will have a "Y" for "yes." If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion is federally enforceable; the non-SIP version is not federally enforceable, unless EPA has approved it through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal and state requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations of all of the applicable requirements that apply to each permitted and significant source at the facility. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

<u>Complex Applicability Determinations</u>

- No determinations are currently proposed in this action.

<u>Changes to the Permit, Section IV:</u>

- Update Tables IV-A, IV-C, IV-D, IV-N, and IV-O to modify Part 8 of Condition 9904 in accordance with NSR permit application 26587. The modification of Part 8 of Condition 9904 changes the POC limit from an emission comparison of grouped sources to equivalent annual POC emission limits for congregated sources, which are based on the facility's offset calculation performed in NSR permit application 10569 (Authority to Construct issued July 22, 1993). The change in condition occurred in NSR permit application 26587 (permit issued on October 7, 2014). Part 8a provides the POC emission limit for S-4 and S-6. Part 8b provides the POC emission limit for S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61.
- Update Tables IV-E, IV-F, IV-G, IV-H, IV-J, IV-K, and IV-Q to modify Condition 1701 in accordance with NSR permit application 26660 to allow the use of acetone as a cleanup solvent. Condition 1701, Part 1, provides an annual NPOC limit. Condition

1701, Part 2, provides an annual POC limit. Condition 1701, Part 3, references monitoring requirements for this condition.

- Update Tables IV-L, IV-M, IV-P to modify Condition 1701 in accordance with NSR permit application 26660 to allow the use of acetone as a cleanup solvent. Condition 1701, Part 1, provides an annual NPOC limit. Condition 1701, Part 2, provides an annual POC limit. Condition 1701, Part 3, references monitoring requirements for this condition. In addition, the tables were updated to include modifications to Part 8 of Condition 9904 in accordance with NSR permit application 26587. The modification of Part 8 of Condition 9904 changes the POC limit from an emission comparison of grouped sources to equivalent annual POC emission limits for congregated sources, which are based on the facility's offset calculation performed in NSR permit application 10569 (Authority to Construct issued July 22, 1993). The change in condition occurred in NSR permit application 26587 (permit issued on October 7, 2014). Part 8a provides the POC emission limit for S-4 and S-6. Part 8b provides the POC emission limit for S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61.
- Update Table IV-T by replacing Condition 18645 with Condition 26111 in accordance with NSR permit application 26587. Condition 18645 provided a POC emission limit associated with ink and net cleanup solvent usages. Condition 26111 provides POC mass emission limits equivalent to the POC threshold identified in Condition 18645. Part 1 of this condition provides the POC emission limit, Part 2 of this condition provides the NPOC emission limit, and Part 3 of this condition provides recordkeeping requirements for S-68 and S-69.
- Update Table IV-U by replacing Condition 20955 with Condition 26111 in accordance with NSR permit application 26587. Condition 20955 provided a POC emission limit associated with ink and net cleanup solvent usages. Condition 26111 provides POC mass emission limits equivalent to the POC threshold identified in Condition 20955. Part 1 of this condition provides the POC emission limit, Part 2 of this condition provides the NPOC emission limit, and Part 3 of this condition provides recordkeeping requirements for S-68 and S-69.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10, which provides that a major facility review permit shall contain the following information and provisions:

"409.10 A schedule of compliance containing the following elements:

10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;

10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and

10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted."

Since the last renewal, BMBC has had two outstanding compliance milestones listed in Section V, which are as follows:

1. Compliance with Permit Condition #9904

Sources: S-4, S-6, S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-61, and S-62

Compliance Milestones:

Sources S-4, S-6, S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-61, and S-62 are not complying with the emission limits in Permit Condition #9904, Part 8, due to the fact that all of Line 1, including sources S-4 and S-6 were shut down for 8 months. If any of the lines in the plant are shut down, the compliance calculation in Condition #9904 does not work as intended.

- By no later than October 1, 2014, the owner/operator shall submit an application for a Change of Condition for revision of the permit condition, with supporting emission or other documentation.

2. Compliance with Permit Condition #1701

Sources: S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62

Compliance Milestones:

Sources S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62 are not complying with clarifications to the clean-up solvent emission limits in Permit Condition #1701, Part 1 made under this permit renewal to include both precursor organic compounds and non-precursor organic compounds. The permit condition was originally issued limiting precursor organic compound emissions, including acetone, which was considered a precursor organic compound at that time. Acetone was subsequently deemed a non-precursor organic compound, however the emission limit in Condition #1701, Part 1, was not updated to reflect this change. After acetone was deemed a non-precursor organic compound, the plant switched to acetone to reduce the regulatory burden on the plant. During review of the permit conditions for this Title V permit renewal, the District discovered this clarification had not made and has corrected the reference. Ball Metal believed that the permit condition allowed unlimited acetone usage and, as a result, had used acetone in quantities that exceed the now-clarified total organic compound emission limit. Ball Metal submitted Application #26660 for a Change of Condition to revise this limit on December 20, 2014.

- The owner/operator shall continue to provide all data necessary evaluate and process Application #26660 in a timely manner.

BMBC submitted NSR permit application 26587 on September 17, 2014 for the revision of Condition 9904, Part 8 and NSR permit application 26660 on October 20, 2014 to allow the use of acetone as a cleaning solvent at the facility. Permits to Operate for NSR permit applications 26587 and 26660 were provided on December 16, 2014 and February 17, 2015, respectively.

BMBC is required to continually comply with all applicable requirements cited in this permit. In addition, BMBC will also need to comply with applicable requirements that become effective during the term of this permit on a timely basis.

Changes to the Permit, Section V:

- Strikeout compliance milestones added in Major Facility Review permit renewal issued on January 27, 2015.

VI. Permit Conditions

Each permit condition is identified with a unique numerical identifier, up to five digits. The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This term is used for a condition imposed by the APCO that limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.
- TRMP: This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy. This policy was replaced by Regulation 2, Rule 5 in 2005.

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and, as appropriate, revised the conditions for clarity and enforceability. While the District has authority to revise the existing permits, and is doing so here concomitantly with the Title V process, it also has authority to supplement the terms of existing permits through the Title V process itself. Additional monitoring has been added, where appropriate, to assure compliance with the applicable requirements.

Changes to the Permit, Section VI:

- Condition 1701 applies to solvent cleaning operations at the facility. Condition 1701 was modified to allow the use of acetone, as well as the continued use of isopropyl alcohol. In addition, Condition 1701 was updated to remove all references to decommissioned sources at the facility and include S-62 pursuant to Major Facility Review application 23415. The following provides the deletions in strikeout and additions in underline.

Condition 1701

Conditions for S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62

~~1. The owner/operator shall ensure that total precursor organic compound (POC) and non-precursor organic compound (NPOC) emissions resulting from clean-up solvent usage associated with S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62 do not exceed 16.830 tons totaled over any consecutive twelve month period. (basis: cumulative increase)~~

~~2. On a monthly basis, the owner/operator shall record clean-up solvent usage and shall calculate the total monthly and consecutive 12 month POC and NPOC emissions resulting from clean-up solvent usage associated with the sources cited in Part #1 in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request. (basis: cumulative increase, Regulation 2-6-501)~~

1. Total NPOC emissions resulting from clean-up solvent usage associated with S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62 shall not exceed 28 tons totaled over any consecutive twelve month period.

2. In addition to the limit in part 1, the owner/operator shall not exceed the following usage limits during any consecutive twelve-month period:
50 gallons of isopropyl alcohol.

3. The total POC and NPOC emissions resulting from clean-up solvent usage associated with the sources cited in part #1 shall be recorded on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request.

- Condition 9904 applies to process line operations at the facility. Condition 9904 Part 8 was modified to make the wording clearer. In addition, the condition was altered to remove references to decommissioned sources and provide monitoring and recordkeeping requirements. The following provides the deletions in strikeout and additions in underline.

Condition 9904 Part 8

~~8. The owner/operator shall ensure that the total POC emissions captured from S-6 and S-4 and abated by A-5 are greater than or equal to the difference between the total POC emissions from sources S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, & S-61 and the total POC emissions captured from sources S-7, S-53, S-56, S-58, & S-61 and abated by A-5 during any consecutive twelve month period.~~
~~a. On a monthly basis, the owner/operator shall calculate and record the abated emissions from S-4 and S-6, and the total POC emissions from sources S-51,~~

~~S-52, S-53, S-55, S-56, S-57, S-58, S-60, & S-61 and the total abated POC emissions from sources S-7, S-53, S-56, S-58, & S-61 for the prior month and calculate the most recent 12-month sums to demonstrate compliance with Part 8 above.~~

~~b. For the purposes of this condition, 40% by weight of POC emissions due to basecoat, overvarnish, bottomcoat, and ink usage are attributed to the applicator source and 60% by weight of POC emissions are attributed to the corresponding curing oven source. In the case of internal coating, 50% by weight of POC emissions are attributed to the applicator source and 50% by weight are attributed to the corresponding curing oven source.~~

~~(basis: cumulative increase, offsets)~~

8. During any consecutive twelve month period, total POC emission after abatement shall not exceed the following:
   a. 5.164 tons from S-4 and S-6
   b. 29.342 tons from S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61

   On a monthly basis, the owner/operator shall calculate and record the total abated emissions from S-4 and S-6 combined and S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61 combined and determine the most recent 12 month summations to demonstrate compliance with Parts 8a and 8b above. For the purposes of this condition, 40% by weight of POC emissions due to basecoat, overvarnish, bottomcoat, and ink usage are attributed to the applicator source and 60% by weight of POC emissions are attributed to the corresponding curing oven source. In the case of internal coating, 50% by weight of POC emissions are attributed to the applicator source and 50% by weight are attributed to the corresponding curing oven source. (basis: cumulative increase, offsets)

- Conditions 18645 and 20955 apply to ink usage and cleaning operations at S-68 and S-69, respectively. Conditions 18645 and 20955 were combined and modified to allow the usage of different inks by limiting emissions based on the mass of POC instead of the amount of inks used. The new condition associated with S-68 and S-69 is Condition 26111. The following provides the deletions in strikeout and additions in underline.

Condition #18645

~~Condition for source S-68, Ink Dot Printer~~

~~1. The owner/operator shall ensure that the net ink usage at S-68 does not exceed 75 gallons totaled over any consecutive twelve month period. (basis: cumulative increase)~~

~~2. The owner/operator shall ensure that the net clean-up (flushing) solvent usage at S-68 does not exceed 15 gallon totaled over any consecutive twelve month period. (basis: cumulative increase)~~

~~3. The owner/operator of S-68 shall maintain all information and records necessary to demonstrate compliance with the Alternative Emission Control Plan requirements of Regulation 8-11-305 and Parts 1 and 2. These records shall be made available to District personnel upon request and retained on site for a minimum of five years from the date of entry. (basis: cumulative increase, Regulation 8-11-305, Regulation 2-6-501)~~

Condition #20955

~~Condition for source S-69, Ink Dot Printer~~

~~1. The owner/operator shall ensure that the net ink usage at S-69 does not exceed 60 gallons totaled over any consecutive twelve-month period. (basis: cumulative increase)~~

~~2. The owner/operator shall ensure that the net clean-up (flushing) solvent usage at S-69 does not exceed 14 gallons totaled over any consecutive twelve-month period. (basis: cumulative increase)~~

~~3. The owner/operator of S-69 shall maintain all information and records necessary to demonstrate compliance with the Alternative Emission Control Plan requirements of Regulation 8-11-305 and Parts 1 and 2. These records shall be made available to District personnel upon request and retained on site for a minimum of five years from the date of entry. (basis: cumulative increase, Regulation 8-11-305, Regulation 2-6-501)~~

Condition #26111

Ball Metal Container Division
Plant #148
Conditions for sources S-68 and S-69, Ink Dot Printers

1. Total POC emissions resulting from ink dot usage associated with S-68 and S-69 shall not exceed 1,018 pounds totaled over any consecutive twelve month period.

2. In addition to the limit in part 1, the owner/operator shall not exceed the following usage limits, including ink dot, during any consecutive twelve-month period:
164 gallons of acetone

3. The total POC and NPOC emissions resulting from ink dot and acetone associated with the sources cited in part #1 shall be recorded on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request.

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of

monitoring, and type of monitoring. The applicable requirements for monitoring are contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) the degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements**.** It follows that, although Title V calls for a re-examination of all monitoring**,** there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. When a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation**.** Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate**.**

The tables below list only the emission limits for which there is no monitoring in the applicable requirements. For each emission limit without corresponding monitoring, the analysis of the individual source compliance status has been documented. If a determination of inadequate monitoring was found, additional monitoring would be proposed through this minor permit revision. Monitoring requirements have been included to reflect the changes performed on BAAQMD Condition 1701. In addition, BAAQMD Condition 9904, Part 8 has been revised to include monthly usage recordkeeping and emission calculations to demonstrate compliance with the subparts of BAAQMD Condition 9904, Part 8. The District has examined the monitoring requirements for applicable emission limits and has determined that monitoring is adequate, with the proposed revisions, to provide a reasonable assurance of compliance.

<u>Changes to the Permit, Section VII:</u>

- Tables VII-A and VII-C were modified to update BAAQMD Condition 9904, Part 8. The modification to Part 8 of Condition 9904 changes the POC limit from an emission comparison of grouped sources to equivalent annual POC emission limits for congregated sources, which are based on the facility's offset calculation performed in NSR permit application 10569 (Authority to Construct issued July 22, 1993). Tables VII-A and VII-C reference BAAQMD Condition 9904, Part 8a as the limit and BAAQMD Condition 9904, Part 8 as the monitoring requirement. The following shows the changes made within the tables.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQMD Condition #9904, Part 8a	Y		~~Abated 12-month POC emissions from S-4 and S-6 ≥ [(Emissions from S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, S-61) – (abated emissions from S-7, S-53, S-56, S-58, S-61)]~~ Consecutive 12 month abated POC emissions from S-4 and S-6 ≤ 5.164 tons	BAAQMD Condition #9904, Part~~s~~ 8~~a and 8b~~	P/M	Usage Records and Emission Calculations

- Tables VII-D, VII-N, and VII-O were modified to update BAAQMD Condition 9904, Part 8. The modification to Part 8 of Condition 9904 changes the POC limit from an emission comparison of grouped sources to equivalent annual POC emission limits for congregated sources, which are based on the facility's offset calculation performed in NSR permit application 10569 (Authority to Construct issued July 22, 1993). Tables VII-D, VII-N and VII-O reference BAAQMD Condition 9904, Part 8b as the limit and BAAQMD Condition 9904, Part 8 as the monitoring requirement. The following shows the changes made within the tables.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	BAAQMD Condition #9904, Part 8b	Y		~~Abated 12-month POC emissions from S-4 and S-6 ≥ [(Emissions from S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, S-61) – (abated emissions from S-7, S-53, S-56, S-58, S-61)]~~ Consecutive 12 month abated POC emissions from S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61 ≤ 29.342 tons	BAAQMD Condition #9904, Part~~s~~ 8~~a and 8b~~	P/M	Usage Records and Emission Calculations

- Tables VII-E, VII-F, VII-G, VII-H, VII-J, VII-K, and VII-Q were updated for the modification of BAAQMD Condition 1701. BAAQMD Condition 1701 was modified in NSR permit application 26660 to allow the use of acetone as a cleanup solvent, in addition to isopropyl alcohol. BAAQMD Condition 1701, Part 1 provides an annual NPOC limit. BAAQMD Condition 1701, Part 2 provides an annual POC limit.

BAAQMD Condition 1701, Part 3 is referenced as the monitoring requirement for this condition. The following shows the changes made within the tables.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
~~POC and~~ NPOC	BAAQMD Condition #1701, Part 1	Y		~~≤ 16.830 tons in any consecutive 12 month period from clean-up solvent (combined limit for S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, S-62)~~ Consecutive 12 month NPOC emissions from S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62 ≤ 28 tons	BAAQMD Condition #1701, Part ~~2~~3	P/M	Solvent Usage Records and Emission Calculations
POC	BAAQMD Condition #1701, Part 2	Y		Consecutive 12 month isopropyl alcohol usage from S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62 ≤ 50 gallons	BAAQMD Condition #1701, Part 3	P/M	Solvent Usage Records

- Tables VII-L, VII-M, VII-P were updated to include the modification of BAAQMD Condition 1701. BAAQMD Condition 1701 was modified in NSR permit application 26660 to allow the use of acetone as a cleanup solvent, in addition to isopropyl alcohol. BAAQMD Condition 1701, Part 1 provides an annual NPOC limit. BAAQMD Condition 1701, Part 2 provides an annual POC limit. BAAQMD Condition 1701, Part 3 is referenced as the monitoring requirement for this condition. In addition, the tables were modified to update BAAQMD Condition 9904, Part 8. The modification to Part 8 of Condition 9904 changes the POC limit from an emission comparison of grouped sources to equivalent annual POC emission limits for congregated sources, which are based on the facility's offset calculation performed in NSR permit application 10569 (Authority to Construct issued July 22, 1993). The tables reference BAAQMD Condition 9904, Part 8b as the limit and BAAQMD Condition 9904, Part 8 as the monitoring requirement. The following shows the changes made within the tables.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
~~POC and~~ NPOC	BAAQMD Condition #1701, Part 1	Y		~~≤ 16.830 tons in any consecutive 12 month period from clean up solvent (combined limit for S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, S-62)~~ Consecutive 12 month NPOC emissions from S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62 ≤ 28 tons	BAAQMD Condition #1701, Part ~~2~~3	P/M	Solvent Usage Records and Emission Calculations
POC	BAAQMD Condition #1701, Part 2	Y		Consecutive 12 month isopropyl alcohol usage from S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, S-60, and S-62 ≤ 50 gallons	BAAQMD Condition #1701, Part 3	P/M	Solvent Usage Records
POC	BAAQMD Condition #9904, Part 8b	Y		~~Abated 12-month POC emissions from S-4 and S-6 ≥ [(Emissions from S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, S-61) – (abated emissions from S-7, S-53, S-56, S-58, S-61)]~~ Consecutive 12 month abated POC emissions from S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61 ≤ 29.342 tons	BAAQMD Condition #9904, Part~~s~~ 8~~a and 8b~~	P/M	Usage Records and Emission Calculations

- Table VII-T was updated to replace reference to BAAQMD Condition 18645 with BAAQMD Condition 26111. In addition, Table VII-T was updated to remove reference to BAAQMD Condition 20955, since this condition is not associated with S-68. Conditions 18645 and 20955 provided POC emission limits associated with ink and net cleanup solvent usages. Condition 26111 provides POC mass emission limits equivalent

to the POC threshold identified in Condition 18645. Part 1 of BAAQMD Condition 26111 provides the POC emission limit, Part 2 of BAAQMD Condition 26111 provides the NPOC emission limit, and Part 3 of BAAQMD Condition 26111 provides recordkeeping requirements for S-68 and S-69. The following shows the changes made within the table.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
~~Ink Usage~~	~~BAAQMD Condition #18645, Part 1~~	~~Y~~		~~≤ 75 gallons, net, in any consecutive 12-month period~~	~~BAAQMD Condition #18645, Part 3~~	~~P/M~~	~~Usage Records~~
~~Clean-up/ Flushing Solvent Usage~~	~~BAAQMD Condition #18645, Part 2~~	~~Y~~		~~≤ 15 gallons, net, in any consecutive 12-month period~~	~~BAAQMD Condition #18645, Part 3~~	~~P/M~~	~~Usage Records~~
~~Ink Usage~~	~~BAAQMD Condition #20955, Part 1~~	~~Y~~		~~≤ 60 gallons, net, in any consecutive 12-month period~~	~~BAAQMD Condition #20955, Part 3~~	~~P/M~~	~~Usage Records~~
~~Clean-up/ Flushing Solvent Usage~~	~~BAAQMD Condition #20955, Part 2~~	~~Y~~		~~≤ 14 gallons, net, in any consecutive 12-month period~~	~~BAAQMD Condition #20955, Part 3~~	~~P/M~~	~~Usage Records~~
POC	BAAQMD Condition #26111, Part 1	Y		Consecutive 12 month POC emissions from S-68 and S-69 ≤ 1,018 pounds	BAAQMD Condition #26111, Part 3	P/M	Usage Records and Emission Calculations
NPOC	BAAQMD Condition #26111, Part 2	Y		Consecutive 12 month acetone usage from S-68 and S-69 ≤ 164 gallons	BAAQMD Condition #26111, Part 3	P/M	Usage Records

- Table VII-U was updated to replace reference to BAAQMD Condition 20955 with BAAQMD Condition 26111. Condition 20955 provided POC emission limits associated with ink and net cleanup solvent usages. Condition 26111 provides POC mass emission limits equivalent to the POC threshold identified in Condition 20955. Part 1 of BAAQMD Condition 26111 provides the POC emission limit, Part 2 of BAAQMD Condition 26111 provides the NPOC emission limit, and Part 3 of BAAQMD Condition 26111 provides recordkeeping requirements for S-68 and S-69. The following shows the changes made within the table.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
~~Ink Usage~~	~~BAAQMD Condition #20955, Part 1~~	~~Y~~		~~≤ 60 gallons, net, in any consecutive 12-month period~~	~~BAAQMD Condition #20955, Part 3~~	~~P/M~~	~~Usage Records~~
~~Clean-up/ Flushing Solvent Usage~~	~~BAAQMD Condition #20955, Part 2~~	~~Y~~		~~≤ 14 gallons, net, in any consecutive 12-month period~~	~~BAAQMD Condition #20955, Part 3~~	~~P/M~~	~~Usage Records~~
POC	BAAQMD Condition #26111, Part 1	Y		Consecutive 12 month POC emissions from S-68 and S-69 ≤ 1,018 pounds	BAAQMD Condition #26111, Part 3	P/M	Usage Records and Emission Calculations
NPOC	BAAQMD Condition #26111, Part 2	Y		Consecutive 12 month acetone usage from S-68 and S-69 ≤ 164 gallons	BAAQMD Condition #26111, Part 3	P/M	Usage Records

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

Changes to Permit, Section VIII:

- Correct spelling error in Table VIII referencing California Code of Regulations, Title 17, Section 93115.5(a). The following shows the change made within the table.

Applicable Requirement	Description of Requirement	Acceptable Test Methods
CCR Title 17, Section 93115.5(a)	CARB Diesel Fuel	ASTM Test Method D5453-93, Standard Test Method for Determination of Total Sulfur in Light Hydrocarbons, Spark Ignition Engine Fuel, Diesel Engine Fuel, and Engine Oil by Ultraviolet ~~Flurorescence~~Fluorescence and ASTM Test Method D5186-96, Standard Test Method for Determination of Aromatic Content and Polynuclear Aromatic Content of Diesel Fuels and Aviation Turbine Fuels by Supercritical Fluid Chromatology

IX. Permit Shield

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in an MFR permit explaining that specific federally enforceable regulations and standards that are not applicable to a source or group of sources, or (2) A provision in an MFR permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, record keeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

Changes to the Permit, Section IX:

- This facility has no permit shield. No changes to this section are currently proposed in this action.

X. Revision History

This section of the permit summarizes each revision to the permit.

Changes to the Permit, Section X:

- The Revision History was updated to provide a summary of the changes performed with this minor revision of the Title V/Major Facility Review permit.

XI. Glossary

This section of the permit defines and explains acronyms, abbreviations, and other terms that are used in this permit.

Changes to the Permit, Section XI:

- No changes to this section are currently proposed in this action.

D. ALTERNATIVE OPERATING SCENARIOS

No alternate operating scenario has been requested for this facility.

E. COMPLIANCE STATUS

The responsible official for Ball Metal Beverage Container Corp. submitted signed application forms for minor revisions to the Title V permit, dated December 4, 2015 and January 13, 2016.

F. DIFFERENCES BETWEEN THE APPLICATION AND THE PROPOSED PERMIT

The Title V permit minor revision applications were received on December 4, 2015 and January 13, 2016. The minor revision application and the previous permit are the basis for constructing

the proposed Title V permit minor revision. All differences between the Title V minor revision application and the proposed permit have been discussed in this Statement of Basis.

The following NSR applications have been discussed in this Statement of Basis and included in the proposed minor revision of the Title V Permit:

- Permit Application #26587 modifying Part 8 of Condition 9904 to establish emission limits for S-4, S-6, S-7, S-51 through S-53, S-55 through S-58, S-60, and S-61 equivalent to the offsets provided in NSR permit application #10569. In addition, S-54 and S-59 have been decommissioned and removed. Permit to Operate issued 12/16/2014.
- Permit Application #26660 modifying Condition 1701, for S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, and S-60, to allow the use of isopropyl alcohol and acetone, thus increasing the facility's non-precursor organic compound (NPOC) annual emission rate to 28 tons per year. In addition, the modification removed all references to archived sources, which include S-14, S-15, S-25, S-26, S-41, S-42, S-43, and S-54. In addition, pursuant to Major Facility Review application 23415, S-62 will be referenced within Condition 1701. Permit to Operate issued 2/17/2015.
- Permit Application #27296 modifying POC emission limit for S-68 and S-69, from gallon of ink used per year to an annual POC mass emission rate. The NSR application has also provided the facility the ability to use 164 gallons of acetone per year, for a total NPOC potential to emit increase equivalent to 0.544 tons per year. Permit to Operate issued 9/22/2015.

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APPENDIX A

GLOSSARY

- **ACT**
- Federal Clean Air Act
- **AP-42**
- An EPA Document "Compilation of Air Pollution Emission Factors" that is used to estimate emissions from numerous source types. It is available electronically from EPA's web site at: http://www.epa.gov/ttn/chief/ap42/index.html
- **APCO**
- Air Pollution Control Officer: Head of Bay Area Air Quality Management District
- **API**
- American Petroleum Institute
- **ARB**
- Air Resources Board (same as CARB)
- **ASTM**
- American Society for Testing and Materials
- **ATC**
- Authority to Construct
- **ATCM**
- Airborne Toxic Control Measure
- **BAAQMD**
- Bay Area Air Quality Management District
- **BACT**
- Best Available Control Technology
- **BARCT**
- Best Available Retrofit Control Technology
- **Basis**
- The underlying authority that allows the District to impose requirements.
- **BDT**
- Best Demonstrated Technology
- **C1**
- An organic chemical compound with one carbon atom, for example: methane

- **C3**
- An organic chemical compound with three carbon atoms, for example: propane
- **C5**
- An Organic chemical compound with five carbon atoms
- **C6**
- An Organic chemical compound with six carbon atoms
- **CAA**
- The federal Clean Air Act
- **CAAQS**
- California Ambient Air Quality Standards
- **CAPCOA**
- California Air Pollution Control Officers Association
- **CARB**
- California Air Resources Board (same as ARB)
- **CCR**
- California Code of Regulations
- **CEC**
- California Energy Commission
- **CEQA**
- California Environmental Quality Act
- **CEM**
- A "continuous emission monitor" is a monitoring device that provides a continuous direct measurement of some pollutant (e.g. NOx concentration) in an exhaust stream.
- **CFR**
- The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.
- **CH4 or CH_4**
- Methane
- **CO**
- Carbon Monoxide
- **CO2 or CO_2**
- Carbon Dioxide

- **CT**
- Combustion Zone Temperature
- **Cumulative Increase**
- The sum of permitted emissions from each new or modified source since a specified date. Used to determine whether threshold-based requirements are triggered.
- **District**
- The Bay Area Air Quality Management District
- **dscf**
- Dry Standard Cubic Feet
- **dscm**
- Dry Standard Cubic Meter
- **E 6, E9, E12**
- Very large or very small number values are commonly expressed in a form called scientific notation, which consists of a decimal part multiplied by 10 raised to some power. For example, 4.53 E 6 equals (4.53) x (10^6) = (4.53) x (10 x 10 x 10 x 10 x 10 x 10) = 4,530,000. Scientific notation is used to express large or small numbers without writing out long strings of zeros.
- **EG**
- Emission Guidelines
- **EGT**
- Exhaust Gas Temperature
- **EO**
- Executive Order
- **EPA**
- The federal Environmental Protection Agency.
- **Excluded**
- Not subject to any District regulations.
- **Federally Enforceable, FE**
- All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.
- **FP**
- Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

- **FR**
- Federal Register
- **GDF**
- Gasoline Dispensing Facility
- **GLC**
  Ground level concentration.
- **GLM**
- Ground Level Monitor
- **grains**
- 1/7000 of a pound
- **H2S or H_2S**
- Hydrogen Sulfide
- **H&SC**
- Health and Safety Code
- **HAP**
- Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.
- **Hg**
- Mercury
- **HHV**
- Higher Heating Value. The quantity of heat evolved as determined by a calorimeter where the combustion products are cooled to 60F and all water vapor is condensed to liquid.
- **LFG**
- Landfill gas
- **LHV**
- Lower Heating Value. Similar to the higher heating value (see HHV) except that the water produced by the combustion is not condensed but retained as vapor at 60 °F.
- **Major Facility**
- A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.
- **MAX or Max**.
- Maximum

- **MFR**
- Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.
- **Mg**
- Mega (million) gram
- **MIN or Min**.
- Minimum
- **MOP**
- The District's Manual of Procedures.
- **MSDS**
- Material Safety Data Sheet
- **MSW**
- Municipal solid waste
- **MSWL**
- Municipal solid waste landfill
- **MTBE**
- methyl tertiary-butyl ether
- **MW**
- Molecular weight
- **N2 or N_2**
- Nitrogen
- **NA**
- Not Applicable
- **NAAQS**
- National Ambient Air Quality Standards
- **NESHAPS**
- National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63
- **NMHC**
- Non-methane Hydrocarbons (Same as NMOC)
- **NMOC**
- Non-methane Organic Compounds (Same as NMHC)
- **NOx or NO_x**
- Oxides of nitrogen.

- **NSPS**
- Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

- **NSR**
- New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

- **O2 or O_2**
- Oxygen

- **Offset Requirement**
- A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

- **Phase II Acid Rain Facility**
- A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

- **POC**
- Precursor Organic Compounds

- **PM**
- Particulate Matter

- **PM10 or PM_{10}**
- Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

- **PSD**
- Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

- **PV or P/V Valve**
- Pressure/Vacuum Valve

- **Regulated Organic Liquid**
- "Regulated organic liquids" are those liquids which require permits, or which are subject to some regulation, when processed at a liquid-handling operation. For example, for refinery marine terminals, regulated organic liquids are defined as "organic liquids" in Regulation 8, Rule 44.

RMP
Risk Management Plan

RWQCB
Regional Water Quality Control Board

S
Sulfur

- **SCR**
- A "selective catalytic reduction" unit is an abatement device that reduces NOx concentrations in the exhaust stream of a combustion device. SCRs utilize a catalyst, which operates at a specific temperature range, and injected ammonia to promote the conversion of NOx compounds to nitrogen gas.
- **SIP**
- State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.
- **SO2 or SO_2**
- Sulfur dioxide
- **SO3 or SO_3**
- Sulfur trioxide
- **SSM**
- Startup, Shutdown, or Malfunction
- **SSM Plan**
- A plan, which states the procedures that will be followed during a startup, shutdown, or malfunction, that is prepared in accordance with the general NESHAP provisions (40 CFR Part 63, Subpart A) and maintained on site at the facility.

TAC
Toxic Air Contaminant (as identified by CARB)

1. **THC**
2. Total Hydrocarbons (NMHC + Methane)
3. **therm**
   100,000 British Thermal Unit
5. **Title V**
7. Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC
Total Organic Compounds (NMOC + Methane, Same as THC)

TPH
Total Petroleum Hydrocarbons

TRMP
Toxic Risk Management Policy

TRS
Total Reduced Sulfur

TSP
Total Suspended Particulate

TVP
True Vapor Pressure

VMT
Vehicle Miles Traveled

VOC
Volatile Organic Compounds

Symbols:

<	=	less than
>	=	greater than
≤	=	less than or equal to
≥	=	greater than or equal to

Units of Measure:

atm	=	atmospheres
bbl	=	barrel of liquid (42 gallons)
bhp	=	brake-horsepower
btu	=	British Thermal Unit
BTU	=	British Thermal Unit
°C	=	degrees Centigrade
cfm	=	cubic feet per minute
dscf	=	dry standard cubic feet
°F	=	degrees Fahrenheit
ft^3	=	cubic feet
g	=	grams
gal	=	gallon
gpm	=	gallons per minute

gr	=	grains (7000 grains = 1 pound)
hp	=	horsepower
hr	=	hour
in	=	inches
kg	=	kilograms
kW	=	kilowatts
lb	=	pound
lb-mol	=	pound-mole
M	=	thousand
m^2	=	square meter
m^3	=	cubic meters
max	=	maximum
Mg	=	mega-grams (1000 kg)
min	=	minute
mm	=	millimeter
MM	=	million
MMBTU	=	million BTU
MMcf	=	million cubic feet
mm Hg	=	millimeters of mercury (pressure)
MW	=	megawatts
ppb	=	parts per billion
ppbv	=	parts per billion, by volume
ppbw	=	parts per billion, by weight
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
scfm	=	standard cubic feet per minute
sdcf	=	standard dry cubic feet
sdcfm	=	standard dry cubic feet per minute
therms	=	1 therm = 100,000 BTU
yd	=	yard
yd^3	=	cubic yards
yr	=	year

APPENDIX B

PERMIT APPLICATION ENGINEERING EVALUATIONS

Engineering Evaluations for the following permit applications are attached to the Statement of Basis in this Appendix.

AN	TITLE
26587	Change in Permit Condition 9904, Part 8. Clarify Permit Condition
26660	Change in Permit Condition 1701 and Increase in Cleaning Solvent Usage
27296	Change in Permit Condition and Increase in Cleaning Solvent Usage

ENGINEERING EVALUATION
Ball Metal Beverage Container Corp
Plant No. 148
Application No. 26587

BACKGROUND

Ball Metal Beverage Container Corp has requested a change of conditions to their facility wide condition no. 9904. They have requested specifically a revision to the wording of Part 8, which currently states the following:

> ***8.*** *The total POC emissions captured from S-6 and S-4 and abated by A-5 shall be greater than or equal to the difference between the total POC emissions from sources 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, & 61 and the total POC emissions captured from sources 7, 53, 56, 58, & 61 and abated by A-5 during any consecutive twelve month period. For the purposes of this condition, 40% by weight of POC emissions due to basecoat, overvarnish, bottomcoat, and ink usage are attributed to the applicator source and 60% by weight of POC emissions are attributed to the corresponding curing oven source. In the case of internal coating, 50% by weight of POC emissions are attributed to the applicator source and 50% by weight are attributed to the corresponding curing oven source. (basis: offsets)*

The above condition was created in 1993 under application no. 10569. The purpose of the condition was to verify that the offset requirements were being met. S-6 and S-4 were voluntarily abated which provided the offsets necessary to add new (S-51 through S-61) and modified (S-7) sources to the facility. The condition requires that, on an annual basis, Ball Metal continue to show that the emissions from the new sources remain less than the offset emissions from the old sources.

This recently became an issue because, based on customer demand and maintenance requirements, Ball Metal occasionally shuts down equipment. The condition requires that if, for example, S-6 and S-4 are shut down for a year, all other sources must also be shut down in order to remain in compliance. The situation in which the facility is operating with S-6 and S-4 down was not taken into account when the condition was written.

In response, Part 8 of condition will be updated as follows:

> **8. During any consecutive twelve month period, total POC emission after abatement shall not exceed the following:**
>
> **a. 5.164 tons from S-4 and S-6**
>
> **b. 29.342 tons from S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61**
>
> **For the purposes of this condition, 40% by weight of POC emissions due to basecoat, overvarnish, bottomcoat, and ink usage are attributed to the applicator source and 60% by weight of POC emissions are attributed to the corresponding curing oven source. In the case of internal coating, 50% by weight of POC emissions are attributed to the applicator source and 50% by weight are attributed to the corresponding curing oven source. (basis: cumulative increase, offsets)**

The updated condition establishes emission caps equivalent to the offsets that were provided in 1993. The updated condition also delists S-54 and S-59, which have since been removed. The full engineering evaluation from 1993 is attached to the end of this report for reference.

EMISSIONS CALCULATIONS

There is no change in emissions as a result of this application. The purpose of the condition change is to create a condition that is less ambiguous with regards to allowable emissions. The emission limits will be derived from the initial application in which offsets were granted in 1993. Data from that application is summarized below in the basis and summary tables.

Basis:

- Emissions from S-4 and S-6 were voluntarily abated by an RTO, creating offsets
- Minimum RTO efficiency was 90%
- Of the new/modified sources, S-7, S-53, S-56, S-58, and S-61 were also abated by the RTO
- The RTO had an expected down time of up to 10 days/year for maintenance

Table 1. Offsets generated by abatement of S-4 and S-6

Unabated Emissions from S-4 and -S6:	41.425	tons/yr
Regenerative Thermal Oxidizer Eff.:	90%	
RTO Downtime:	2.74%	
Abated Emissions from S-4 and S-6:	**5.164**	**tons/yr**
Emission Reduction:	36.261	tons/yr

After voluntary abatement of S-4 and S-6, emissions from the two sources should be no more than 5.164 tons/yr of POC. This calculation is summarized above in Table 1. This limit will be added as a permit condition.

Total emissions from the new/modified sources after abatement of select sources should not exceed 29.342 tons/yr. This calculation is summarized below in Tables 2 and 3. This limit will be added as a permit condition. Table 3 also shows that the offsets required by the new equipment (35.211 tons/yr) were covered by the offsets provided by the voluntary abatement shown in Table 1 (36.261 tons/yr).

Table 2. Unabated emissions from new/modified sources

Unabated Emissions From S-7	34.712	tons/yr*
Unabated Emissions From S-51	5.564	tons/yr
Unabated Emissions From S-52	0.705	tons/yr
Unabated Emissions From S-53	11.314	tons/yr*
Unabated Emissions From S-54	4.173	tons/yr
Unabated Emissions From S-55	0.282	tons/yr
Unabated Emissions From S-56	4.455	tons/yr*
Unabated Emissions From S-57	0.282	tons/yr
Unabated Emissions From S-58	4.455	tons/yr*
Unabated Emissions From S-59	0.134	tons/yr
Unabated Emissions From S-60	6.253	tons/yr
Unabated Emissions From S-61	40.920	tons/yr*

****Abated sources***

Table 3. Abated emissions from new/modified sources and offset requirements

Unabated Emissions from S7 through S61:	113.249	tons/yr
Emission Reduction on Abated Sources:	86.270	tons/yr
RTO Downtime	2.74%	
Emission Reduction Considering UO:	83.907	tons/yr
Abated Emissions from S-7 through S-61:	**29.342**	**tons/yr**
Offset Ratio:	1.2	
Offsets Required:	35.211	tons/yr

PLANT CUMMULATIVE INCREASE

Ball Metal Beverage Container Corp at "2400 Huntington Drive, Fairfield, CA 94533" (Plant No. 148) is an existing facility. This application is for a change of conditions with no increase in emissions. Table 3 summarizes the cumulative increases in criteria pollutant emissions that results from this application.

Table 3. Cumulative increases in tons/year

Pollutants	Current Emissions (TPY)	New Emissions (TPY)	New Total Emissions (TPY)
POC	32.536	0.000	32.536
NOx	11.025	0.000	11.025
SO_2	0.000	0.000	0.000
CO	2.750	0.000	2.750
PM_{10}	0.002	0.000	0.002

TOXIC RISK SCREENING

Toxic Risk Screen Analysis is not required for this application since it does not result in a new or modified source.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

BACT is not applicable for this application since it does not result in a new or modified source.

OFFSETS

Offsets are not required because the application does not result in a new or modified source, pursuant to Regulation 2-1 and 2-2.

STATEMENT OF COMPLIANCE

This equipment is in ongoing compliance with Regulation 8, Rule 11 (Metal Container, Closure and Coil Coating), as the VOC content limits with regards to beverage cans have remained unchanged since 1998.

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA (BAAQMD Permit Handbook, Chapter 33).

The project is over 1,000 feet from the nearest school and therefore not subject to the public notification requirements of Reg. 2-1-412.

A Toxics Risk Screening Analysis is not required due to the emissions at the rates discussed above.

PSD, BACT, Offsets, NSPS, and NESHAPS do not apply to this project.

TITLE V IMPLICATIONS

Ball Metal Beverage Container Corp has an existing Title V permit. In accordance with Regulation 2, a determination must be made whether this change constitutes an administrative permit amendment, a significant permit revision, or a minor permit revision. Administrative permit amendments are defined as non-substantive amendments to a major facility review permit. Examples include formatting and typographical corrections, updates that remove outdated material such as sunset clauses and sources no longer in use, and identification of administrative changes at a facility. While there are portions of this application that do constitute an administrative permit amendment (such as removal of sources 54 and 59), the application must be further evaluated to determine whether is constitutes a permit revision.

Regulation 2-6-226 defines a significant revision. This application has no effect on allowable emissions, and so does not apply as a significant revision under 226.1 or 226.2. It also does not apply under 226.3 since the changes made to the permit condition have no effect on monitoring, reporting, or recordkeeping. This application does not establish or change any permit condition designed to avoid the classification as a modification. It simply makes the existing limit more clearly defined. Therefore, definition 226.4 does not apply. Similarly, since this application only acts to more clearly define the existing limits, no case-by-case or facility-specific determinations were made with regards to this application as described in 226.5 and 226.6. Nor were any requirements promulgated by the U.S. EPA under the Clean Air Act incorporated into the permit through this application as described in 226.7.

Since the application does not meet any of the definitions described in 2-6-226, and revisions were made in addition to those listed above as administrative permit amendments, the application constitutes a minor permit revision. Because this is a minor permit revision, the facility can make begin operating in accordance with the changes immediately.

PERMIT CONDITIONS

Condition No. 9904 ----------

Ball Metal Container Division
Plant 148

Facility-Wide Permit Conditions

1. A minimum combustion chamber temperature of 1400 degrees Fahrenheit shall be maintained at A-5 Regenerative Thermal Oxidizer whenever POC emissions are being abated. This minimum temperature may be changed to reflect source test results upon written approval of the APCO. The location and type of the thermocouples used to monitor the combustion chamber temperature shall be subject to the review and approval of the District Source Test Section. (basis: cumulative increase)

2. The combustion chamber temperature of the A-5 RTO shall be monitored and recorded on a continuous basis. (basis: cumulative increase)

3. A-5 RTO combustion chamber temperature records shall be retained on site for a minimum of five years from the date of entry. (basis: cumulative increase)

4. The temperature limit in part 11 shall not apply during an "Allowable Temperature Excursion", provided that the temperature controller setpoint complies with the temperature limit. An Allowable Temperature Excursion is one of the following:

a. A temperature excursion not exceeding 20 degrees F; or
b. A temperature excursion for a period or periods which when combined are less than or equal to 15 minutes in any hour; or
c. A temperature excursion for a period or periods which when combined are more than 15 minutes in any hour, provided that all three of the following criteria are met.

i. the excursion does not exceed 50 degrees F;
ii. the duration of the excursion does not exceed 24 hours; and
iii. the total number of such excursions does not exceed 12 per calendar year (or any consecutive 12 month period).

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12 excursion limit.
(basis: Regulation 2-1-403)

5. For each Allowable Temperature Excursion that exceeds 20 degrees F. and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:

a. Temperature controller setpoint;
b. Starting date and time, and duration of each Allowable Temperature Excursion;
c. Measured temperature during each Allowable Temperature Excursion;
d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
e. All strip charts or other temperature records.
(basis: Regulation 2-1-403)

6. For the purposes of parts 14 and 15, a temperature excursion refers only to temperatures below the limit.

7. The total time allowed for the bypassing of A-5 RTO for the purposes of planned maintenance according to manufacturer's recommendations shall not exceed 240 hours totaled over any consecutive twelve month period. Such bypassing shall not occur on any day which is projected by the District to exceed the State standard for ozone of 75 on the Pollution Standards Index (PSI) or is designated by the District as a "Spare the Air Day". Ball Metal Beverage Container Corporation shall call 1-800-HELP-AIR at 4:30 PM on the day before the planned A-5 bypass day to determine if the following day is designated as a "Spare the Air Day". (basis: cumulative increase)

~~8. The total POC emissions captured from S-6 and S-4 and abated by A-5 shall be greater than or equal to the difference between the total POC emissions from sources 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, & 61 and the total POC emissions captured from sources 7, 53, 56, 58, & 61 and abated by A-5 during any consecutive twelve month period. For the purposes of this condition, 40% by weight of POC emissions due to basecoat, overvarnish, bottomcoat, and ink usage are attributed to the applicator source and 60% by weight of POC emissions are attributed to the corresponding curing oven source. In the case of internal coating, 50% by weight of POC emissions are attributed to the applicator source and 50% by weight are attributed to the corresponding curing oven source. (basis: offsets)~~

8. During any consecutive twelve month period, total POC emission after abatement shall not exceed the following:
a. 5.164 tons from S-4 and S-6
b. 29.342 tons from S-7, S-51, S-52, S-53, S-55, S-56, S-57, S-58, S-60, and S-61
For the purposes of this condition, 40% by weight of POC emissions due to basecoat, overvarnish, bottomcoat, and ink usage are attributed to the applicator source and 60% by weight of POC emissions are attributed to the corresponding curing oven source. In the case of internal coating, 50% by weight of POC emissions are attributed to the applicator source and 50% by weight are attributed to the corresponding curing oven source. (basis: cumulative increase, offsets)

9. Ball Metal Beverage Container Corporation shall install totalizing flow meters on internal coating, overvarnish, bottomcoating, and basecoating bulk storage systems to monitor coating type and usage (in gallons). Ink usage shall be monitored by weight. (basis: cumulative increase)

10. The POC control (destruction) efficiency of A-5 Regenerative Thermal Oxidizer shall be at least 95% by weight when abating sources 4, 5, 6, 7, 25, 53, 56, 58, and 61. (basis: cumulative increase)

11. On an annual basis, Ball Metal Container shall perform a District-approved source test of A-5 RTO under worst-case organic loading to verify compliance with condition #10. Ball Metal Container shall submit a source test protocol to the District Permit Services Division and Source Test Section at least one month prior to the source test date. The protocol shall include, but not be limited to, the following:
a. Plans specifying the location and type of the A-5 combustion chamber temperature thermocouples
b. Location of source test sampling ports
c. Test method for determination of POC destruction efficiency
(basis: cumulative increase)

Conditions for S-4, S-6, S-12, S-16, & S-62
Line #1: Source of Precursor Organic Compound (POC) Offsets

12. S-6 Line #1 Internal Coating Oven and S-4 Line #1 Deco Oven shall be abated by A-5 Regenerative Thermal Oxidizer (RTO), Salem-Engelhard whenever coated cans are being cured in S-4 and/or S-6 except when A-5 RTO is out of operation due to normal, planned maintenance activities as recommended by the manufacturer. (basis: cumulative increase)

13. Total combined POC (precursor organic compound) emissions (excluding POC emissions from clean-up solvent usage) from S-6 Line #1 Internal Coating Oven and S-16 Line #1 Internal Coating Spray Bank, prior to abatement, shall not exceed 119 tons during any consecutive twelve month period. (basis: cumulative increase)

14. Total combined POC emissions (excluding POC emissions due to clean-up solvent usage) from S-4 Line #1 Deco Oven, S-12 Line #1 Printer with Overvarnish, and S-62 Line #1 bottomcoater, prior to abatement, shall not exceed 47.37 tons during any consecutive twelve month period.
(basis: cumulative increase)

15. Total combined POC emissions from the internal coating application and curing process at S-6 and S-16 and the overvarnish/bottomcoating application and curing process at S-4, S-12, and S-62, prior to abatement, shall be calculated from the coating density (pounds per gallon), the coating weight percent VOC content as-applied (weight percent), and the net coating usage (gallons/month) as follows:
Tons of POC emissions, prior to abatement =
(pounds of coating/gallon of coating) X (coating weight percent VOC content) X (gallons of coating used) X (ton/2000 pounds)
(basis: cumulative increase)

16. Total combined POC emissions from the ink application and curing process at S-4 and S-12, prior to abatement, shall be calculated from the ink weight percent VOC content as-applied (weight percent), and the net ink usage (pounds/month) as follows:
Tons of POC emissions, prior to abatement =
(ink weight percent VOC content) X (pounds of ink used) X (ton/2000 pounds)
(basis: cumulative increase)

17. The owner/operator of S-6 and S-4 shall maintain records of Line #1 hours of operation, POC emissions from S-6 and S-4, and A-5 maintenance "downtime" on a monthly basis in a District-approved log. These records shall be retained on-site for a minimum of two years from the date of entry and made available to District representatives upon request. (basis: BAAQMD Regulation 2-6-501)

Conditions for S-7, S-17, S-24, and S-61

Lines 2 and 3 Internal Coating Operations

18. Total combined POC emissions (excluding POC emissions due to clean-up solvent usage) from S-17 Line #2 Internal Coating Spray Bank, S-7 Line #2 Internal Coating Oven, S-24 Line #3 Internal Coating Spray Bank, and S-61 Line #3 Internal Coating Oven, prior to abatement shall not exceed 288.12 tons during any consecutive twelve month period. (basis: cumulative increase)

19. Total combined POC emissions (excluding POC emissions due to clean-up solvent usage) from the internal coating application and curing process at S-7, S-17, S-24, and S-61, prior to abatement, shall be calculated from the internal coating density (pounds per gallon), the coating weight percent VOC content as-applied (weight percent), and the net coating usage (gallons/month) as follows:
Tons of POC emissions, prior to abatement =
(pounds of coating/gallon of coating) X (coating weight percent VOC content) X (gallons of coating used) X (ton/2000 pounds)
(basis: cumulative increase)

20. S-7 Line #2 Internal Coating Oven and S-61 Line #3 Internal Coating Oven shall be abated by A-5 Regenerative Thermal Oxidizer, Salem-Engelhard whenever coated cans are being cured in S-7 and/or S-61 except when A-5 RTO is not in operation due to normal, planned maintenance activities as recommended by the manufacturer. (basis: cumulative increase)

21. The owner/operator of S-7, S-17, S-24, and S-61 shall maintain records of the data described in condition #19, total POC emissions, and the total hours of A-5 maintenance downtime on a monthly basis in a District-approved log. These records shall be retained on-site for a minimum of two years from the date of entry and made available to District representatives upon request. (basis: BAAQMD Regulation 2-6-501)

Conditions S-5, S-51, S-26, ~~S-54,~~ S-56, & S-58
Lines 2 & 3 Basecoating Operations

22. Total combined POC emissions (excluding POC emissions due to cleanup solvent usage) from S-51 Line #2 Basecoater, and S-5 Line #2 Basecoat Oven, prior to abatement, shall not exceed 64.7 tons during any consecutive twelve month period.(basis: cumulative increase)

23. Total combined POC emissions (excluding POC emissions due to clean-up solvent usage) from the basecoating application and curing process at S-5, S-51, S-56, & S-58, prior to abatement, shall be calculated from the coating density (pounds per gallon), the coating weight percent VOC content, as-applied (weight percent), and the

net coating usage (gallons) as follows:
Tons of POC emissions, prior to abatement =
(pounds of coating/gallon of coating) X (coating weight
percent VOC content) X
(gallons of coating used) X (ton/2000 pounds)
(basis: cumulative increase)

24. S-56 Decorator Oven #31 and S-58 Decorator Oven #32 shall be abated by A-5 Regenerative Thermal Oxidizer whenever coated cans are being cured at S-56 and/or S-58 except when A-5 RTO is not in operation due to normal, planned maintenance activities as recommended by the manufacturer. (basis: cumulative increase)

25. The owner/operator of S-5, S-51, S-56, & S-58 shall maintain records of POC emissions, the data described in condition #24, and the total hours of A-5 maintenance downtime on a monthly basis in a District-approved log. These records shall be retained on-site for a minimum of two years from the date of entry and made available to District representatives upon request.
(basis: BAAQMD Regulation 2-6-501)

Conditions For S-13, S-27, S-52, S-53, S-55, S-56, S-57, S-58, & S-60
Lines 2 & 3 Ink, Overvarnish, and Bottomcoating Operations

26. Total combined POC emissions (excluding POC emissions due to clean-up solvent usage) from S-13, S-27, S-52, S-53, S-55, S-56, S-57, S-58, & S-60 due to overvarnish and bottomcoating usage, prior to abatement, shall not exceed 83.31 tons during any consecutive twelve month period.
(basis: cumulative increase)

27. Total combined POC emissions from S-13, S-56, S-58, S-27 S-53, & S-60 due to ink usage, prior to abatement, shall not exceed 31.35 tons during any consecutive twelve month period. (basis: cumulative increase)

28. The total combined POC emissions (excluding POC emissions due to clean-up solvent usage) from the bottomcoating and overvarnish application and curing process at S-13, S-27, S-52, S-53, S-55, S-56, S-57, S-58, & S-60, prior to abatement, shall be calculated from the coating density (pounds per gallon), the coating weight percent VOC content, as-applied (weight percent), and the net coating usage (gallons) as follows:
Tons of POC emissions, prior to abatement =
(pounds of coating/gallon of coating) X (coating weight
percent VOC content) X (gallons of coating used) X
(ton/2000 pounds)
(basis: cumulative increase)

29. The total combined POC emissions (excluding POC

emissions due to clean-up solvent usage) from ink application and curing process at S-13, S-56, S-58, S-27, S-53,& S-60, prior to abatement, shall be calculated from the ink weight percent VOC content, as-applied (weight percent), and the net ink usage (pounds) as follows:
Tons of POC emissions, prior to abatement =
(ink weight percent VOC content) X (pounds of ink used) X (ton/2000 pounds)
(basis: cumulative increase)

30. S-53 Line #2 Deco Oven, S-56 Line #2 Decorator Oven 31, S-58 Line #2 Decorator Oven 32 shall be abated by A-5 Regenerative Thermal Oxidizer (RTO) whenever coated cans are being cured at these sources except when A-5 RTO is not in operation due to normal, planned maintenance activities as recommended by the manufacturer.(basis: cumulative increase)

31. The owner/operator of S-13, S-27, S-52, S-53, S-55, S-56, S-57, S-58, & S-60 shall maintain records of POC emissions, the data described in condition #30, and the total hours of A-5 maintenance downtime on a monthly basis in a District-approved log. These records shall be retained on-site for a minimum of two years from the date of entry and made available to District representatives upon request. (basis: BAAQMD Regulation 2-6-501)

RECOMMENDATION

Issue a Change of Conditions to Ball Metal Beverage Container Corp for Condition number 9904 in accordance with the wording above.

By: Simon Margolis Date: 8/8/2016

Simon Margolis
Air Quality Engineer

ENGINEERING EVALUATION

Ball Metal Beverage Container Corp
Plant No. 148
Application No. 26660

BACKGROUND

Ball Metal Beverage Container Corp has requested a modification to condition no. 1701, listed below:

S-12 through S-17, S-24 through S-28, S-35, S-41 through S-46, S-51, S-52, S-54, S-55, S-57, and S-60

1. *Total POC emissions resulting from clean-up solvent usage associated with S-12 through S-17, S-24 through S-28, S-35, S-41 through S-46, S-51, S-52, S-54, S-55, S-57, S-59, and S-60 shall not exceed 16.830 tons totaled over any consecutive twelve month period.*

2. *The total POC emissions resulting from clean-up solvent usage associated with the sources cited in condition #1 shall be recorded on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request.*

They have requested specifically a modification to the allowable organic emissions. When permit condition no. 1701 was written, Ball Metal was using isopropyl alcohol (IPA) exclusively as a clean-up solvent at the facility. When the EPA added acetone to the list of compounds excluded from the definition of VOC in 1995, Ball Metal switched to acetone at all of their plants nationwide. Although the switch occurred many years ago, the discrepancy in the permit was only recently discovered. Ball Metal still uses a very small amount of IPA in the shop to wipe clean tooling. Current usage is around 20 gallons/yr. They have requested a permitted limit of 50 gallons/yr.

Ball Metal is requesting to modify emission limits from the previously permitted 16.830 tons/yr of POC to 28 tons/yr of NPOC. The updated condition will allow a small amount of IPA. The list of sources applicable to this condition will be updated as well (sources 14, 15, 25, 26, 41, 42, 43, and 54, which are all listed in the previous condition, were all archived between 1995 and 2005). The updated condition will read as follows:

S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, and S-60

1. *Total NPOC emissions resulting from clean-up solvent usage associated with S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, and S-60 shall not exceed 28 tons totaled over any consecutive twelve month period.*

2. *In addition to the limit in part 1, the owner/operator shall not exceed the following usage limits during any consecutive twelve-month period:*
   50 gallons of isopropyl alcohol

3. *The total POC and NPOC emissions resulting from clean-up solvent usage associated with the sources cited in part #1 shall be recorded on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request.*

EMISSIONS CALCULATIONS

The modification will result in a decrease in allowable POC emissions and an increase in allowable NPOC emissions. As requested by the facility, permitted emissions will be as follows:

NPOC = 28 tpy = 154 lbs/day

POC = (50 gal/yr)*(6.55 lb/gal)/(2000 lb/ton) = 0.164 tpy = 0.90 lb/day

POC emissions represent a significant decrease from the previously permitted 16.830 tons/yr to the current permit limit of 0.164 tons/yr.

PLANT CUMMULATIVE INCREASE

Ball Metal Beverage Container Corp at "2400 Huntington Drive, Fairfield, CA 94533" (Plant No. 148) is an existing facility. The POC emissions being removed were permitted prior to 1991, and are therefore not part of the cumulative increase. So there will be no decrease registered. Table 3 summarizes the cumulative increases in criteria pollutant emissions.

Table 3. Cumulative increases in tons/year

Pollutants	Current Emissions (TPY)	New Emissions (TPY)	New Total Emissions (TPY)
POC	32.536	0.000	32.536
NOx	11.025	0.000	11.025
SO_2	0.000	0.000	0.000
CO	2.750	0.000	2.750
PM_{10}	0.002	0.000	0.002
NPOC	0.000	0.000	28.000

TOXIC RISK SCREENING

Acetone is not listed on the District Toxic Air Contaminant (TAC) List of Table 2-5-1. The changes represent a significant decrease in isopropyl alcohol, which is listed as a TAC. Because there will be a decrease in toxic emissions, the requirements of a Health Risk Screening Analysis are not triggered.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

In accordance with Regulation 2-2-301, BACT is triggered for any new or modified source with the potential to emit 10 pounds or more per highest day of POC, NPOC, NOx, CO, SO_2 or PM_{10}.

The change in conditions results in facility-wide NPOC emissions of 28 tons/yr, or about 154 lbs/day. Averaged out over the 15 applicable sources, the potential to emit per source is over 10 pounds per highest day. Therefore, BACT is triggered. BACT for this source is presented in the current BAAQMD BACT/TBACT Workbook for Wipe Cleaning Operation, Document #179B.1, Revision 2 dated 2/4/93. For NPOC, BACT(2) is minimizing the use of solvents, use of lowest practical vapor pressure solvents, use of controlled flow solvent dispenser, and keeping cloths/papers and solvents not in active use kept in closed containers. BACT(1) is wipe cleaning in a hood, booth, or room vented to a control device w/ emissions controlled to overall capture/destruction efficiency greater than 90%.

Ball Metal operates three aluminum can manufacturing lines that span over a mile in length. Acetone is used for three main purposes. The largest quantity of acetone is used for cleaning the track and rails that the aluminum travels on throughout the plant. Due to abrasive contact, aluminum oxide deposits form along the conveyor system at the

plant. Using wipe cleaning, acetone is used to keep the conveyor system clean which allows the aluminum to smoothly pass through the system without being damaged.

Secondly, acetone is used to clean the printing machinery directly. The printing plates are cleaned on a daily basis.

Lastly, acetone is used on the aluminum cans themselves during the process which connects the cylinder of the can to the top of the can. Acetone is used as a cleaning agent during this process in order to ensure a pressurized seal is formed.

Ball Metal satisfies the current BACT(2) standards by minimizing the use of solvents and keeping all solvents not in active use in closed containers. Due to the size of the operation, it is not technologically feasible to enclose the entire plant in order to vent the NPOC emissions from the conveyor system wipe cleaning operation to a control device. The printer and can cleaning operations take place at more well defined locations throughout the plant. However, these locations are spread over a large distance across the shop floor, and are a large distance away from the existing thermal oxidizer which vents the ovens. Additionally, venting cold processes like acetone cleaning to the thermal oxidizer would present maintenance challenges due to condensation formation within the thermal oxidizer. Therefore, due to technological feasibility, BACT(1) is not applicable.

OFFSETS

Per Regulation 2-2-302, offsets must be provided for any new or modified source at a facility that emits more than 10 tons/yr of POC or NOx. Because the only increase in emissions from this modification is NPOC, offsets are not required for this application.

STATEMENT OF COMPLIANCE

This equipment is in ongoing compliance with Regulation 8, Rule 11 (Metal Container, Closure and Coil Coating), as the VOC content limits with regards to beverage cans have remained unchanged since 12/19/1997.

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA (BAAQMD Permit Handbook, Chapter 5.1).

The project is over 1,000 feet from the nearest school and therefore not subject to the public notification requirements of Reg. 2-1-412.

A Toxics Risk Screening Analysis is not required due to the emissions at the rates discussed above.

40 CFR Part 60, Subpart WW, Standards of Performance for the Beverage Can Surface Coating Industry is applicable to exterior base coat, overvarnish coating, inside spray coating operations. This NSPS does not apply to the application of acetone as clean-up solvent.

PSD, Offsets, and NESHAPS do not apply to this project.

TITLE V IMPLICATIONS

Ball Metal Beverage Container Corp has an existing Title V permit. In accordance with Regulation 2, a determination must be made whether this change constitutes an administrative permit amendment, a significant permit revision, or a minor permit revision. Administrative permit amendments are defined as non-substantive amendments to a major facility review permit. Examples include formatting and typographical corrections, updates

that remove outdated material such as sunset clauses and sources no longer in use, and identification of administrative changes at a facility. While there are portions of this application that do constitute an administrative permit amendment (such as removal of sources 14, 15, 25, 26, 41, 42, 43, and 54), the application must be further evaluated to determine whether is constitutes a permit revision.

Regulation 2-6-226 defines a significant revision. This application has no effect on allowable emissions of a Regulated NSR Pollutant, and so does not apply as a significant revision under 226.1 or 226.2. It also does not apply under 226.3 since the changes made to the permit condition have no effect on monitoring, reporting, or recordkeeping. This application does not establish or change any permit condition designed to avoid the classification as a modification. Therefore, definition 226.4 does not apply. Similarly, no case-by-case or facility-specific determinations were made with regards to this application as described in 226.5 and 226.6. Nor were any requirements promulgated by the U.S. EPA under the Clean Air Act incorporated into the permit through this application as described in 226.7.

Since the application does not meet any of the definitions described in 2-6-226, and revisions were made in addition to those listed above as administrative permit amendments, the application constitutes a minor permit revision. Because this is a minor permit revision, the facility can begin operating in accordance with the changes immediately.

PERMIT CONDITIONS

Condition No. 1701 ----------

S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, and S-60

1. ***Total NPOC emissions resulting from clean-up solvent usage associated with S-12, S-13, S-16, S-17, S-24, S-27, S-35, S-44 through S-46, S-51, S-52, S-55, S-57, and S-60 shall not exceed 28 tons totaled over any consecutive twelve month period.***

2. ***In addition to the limit in part 1, the owner/operator shall not exceed the following usage limits during any consecutive twelve-month period:***
   50 gallons of isopropyl alcohol

3. ***The total POC and NPOC emissions resulting from clean-up solvent usage associated with the sources cited in part #1 shall be recorded on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request.***

RECOMMENDATION

Issue a Change of Conditions to Ball Metal Beverage Container Corp for Condition number 1701 in accordance with the wording above.

By: Simon Margolis Date: 8/8/2016

Simon Margolis
Air Quality Engineer

ENGINEERING EVALUATION

Ball Metal Beverage Container Corp
Plant No. 148
Application No. 27296

BACKGROUND

Ball Metal Beverage Container Corp has requested a modification to condition nos. 18645 and 20955, which are listed below in their current form:

COND# 18645 ----------

Ball Metal Container Division
Plant #148
Conditions for source S-68, Ink Dot Printer

1. The owner/operator shall ensure that the net ink usage at S-68 does not exceed 75 gallons totaled over any consecutive twelve month period. (basis: cumulative increase)

2. The owner/operator shall ensure that net clean-up (flushing) solvent usage at S-68 does not exceed 15 gallons totaled over any consecutive twelve month period. (basis: cumulative increase)

3. The owner/operator of S-68 shall maintain all information and records necessary to demonstrate
compliance with the Alternative Emission Control Plan requirements of Regulation 8-11-305 and Parts 1 and 2. These records shall be made available to District personnel upon request and retained on site for a minimum of two years from the date of entry. (basis: cumulative increase, Regulation 8-11-305, Regulation 2-6-501)

COND# 20955 ----------

Ball Metal Beverage Container Corporation
Plant #148
Conditions for S-69, Ink Dot Printer

1. The owner/operator shall insure that the net ink usage at S-69 does not exceed 60 gallons totaled over any consecutive twelve month period. (basis: cumulative increase)

2. The owner/operator shall insure that the net clean-up (flushing) solvent usage at S-69 does not exceed 14 gallons totaled over any consecutive twelve month period. (basis: cumulative increase)

3. The owner/operator of S-69 shall maintain all information and records necessary to demonstrate compliance with the Alternative Emission Control Plan requirements of Regulation 8-11-305 and Parts 1 and 2. These records shall be made available to District personnel upon

request and retained on site for a minimum of five years from the date of entry. (basis: cumulative increase, Regulation 8-11-305, Regulation 2-6-501)

When these permit conditions were written, Ball Metal was using ink-dot material which was 95% POC and 5% solids. The current ink-dot material is made up of 60% NPOC (acetone), 33% POC, and 6% solids. Therefore, while the original intent of the current condition was to limit POC emissions from these sources to 0.264 tpy (S-68) and 0.245 tpy (S-69), the gallon limits are effectively requiring lower POC emissions as the POC in the material has reduced over time. Although the switch to lower POC inks occurred many years ago, effective lowering of the allowable PTE has just recently been realized as being a potential issue. Ball Metal is also no longer using any clean-up (flushing) solvent on these sources.

Ball Metal is requesting to modify emission limits from the previously permitted gallons limits to POC/NPOC limits. While the new condition will contain an allowance for NPOC (acetone), it will have no effect on the PTE for POC.
The updated condition, which will be combined for the two sources, will read as follows:

COND# 26111 ----------

Ball Metal Container Division
Plant #148
Conditions for sources S-68 and S-69, Ink Dot Printers

4. *Total POC emissions resulting from ink dot usage associated with S-68 and S-69 shall not exceed 1,018 pounds totaled over any consecutive twelve month period.*

5. *In addition to the limit in part 1, the owner/operator shall not exceed the following usage limits, including ink dot, during any consecutive twelve-month period:*
   164 gallons of acetone

6. *The total POC and NPOC emissions resulting from ink dot and acetone associated with the sources cited in part #1 shall be recorded on a monthly basis in a District- approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request.*

Part 3 of the previous conditions detailed the requirements of the Alternative Emission Control Plan allowed under Regulation 8-11-305. However, Ball Metal has not been operating under these provisions for some time and does not anticipate needing to in the future. Therefore, they will be removed from the new condition. The facility understands that, should they want to invoke the provisions of section 305 in the future, they would be required to submit a plan for review and approval on an annual basis.

EMISSIONS CALCULATIONS

The modification will not result in any change in allowable POC emissions.

However, this modification will result in an increase in allowable NPOC emissions by allowing the use of acetone in the inks. As requested by the facility, permitted emissions will be as follows:

$$\text{NPOC} = (164 \text{ gal/yr}) * (6.64 \text{ lb/gal}) = 1088.96 \text{ lb/yr} = 0.544 \text{ tpy}$$

These NPOC emissions will be a result solely of ink usage, as no clean-up solvent is used on these sources.

PLANT CUMULATIVE INCREASE

Ball Metal Beverage Container Corp at "2400 Huntington Drive, Fairfield, CA 94533" (Plant No. 148) is an existing facility. This application will not result in a change in the cumulative increase of POC. Table 3 summarizes the cumulative increases in criteria pollutant emissions.

Table 3. Cumulative increases in tons/year

Pollutants	Current Emissions (TPY)	New Emissions (TPY)	New Total Emissions (TPY)
POC	32.536	0.000	32.536
NOx	11.025	0.000	11.025
SO_2	0.000	0.000	0.000
CO	2.750	0.000	2.750
PM_{10}	0.002	0.000	0.002
NPOC	0.000	0.544	28.544

TOXIC RISK SCREENING

Acetone is the only compound with a significant increase and it is not listed on the District Toxic Air Contaminant (TAC) List of Table 2-5-1.

The new ink contains two compounds listed on the District TAC List of Table 2-5-1, propylene glycol monomethyl ether (PGME) and isopropyl alcohol (IPA). It is assumed that the new ink will be used at its maximum capacity. The new ink has a density of 6.81 lb/gal, and a POC content of 33.29% by weight. Therefore, with a POC emission cap of 1,018 pounds, maximum ink usage would be:

Max Usage = (1,018 lb-POC/yr)/(0.3329*6.81 lb-POC/gal) = 449 gal/yr

Maximum hourly emissions will conservatively assume and operating schedule of 52 weeks per year, 5 days per week, and 8 hours per day. Since the two sources have a common limit, it will be assumed as a worst case scenario that all emissions take place at a single source.

PGME = (449 gal/yr)*(6.81 lb/gal)*(0.10) = 305 lb/yr = 0.147 lb/hr

IPA = (449 gal/yr)*(6.81 lb/gal)*(0.02) = 61 lb/yr = 0.029 lb/hr

TAC	Hourly Emissions	Acute Trigger	Annual Emissions	Chronic Trigger
PGME	0.147 lb/hr	N/A	305 lb/yr	270,000 lb/yr
Isopropyl Alcohol	0.029 lb/hr	7.1 lb/hr	61 lb/yr	270,000 lb/yr

Based on the emissions listed above, a Health Risk Screening Analysis is not triggered.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

In accordance with Regulation 2-2-301, BACT is triggered for any new or modified source with the potential to emit 10 pounds or more per highest day of POC, NPOC, NOx, CO, SO_2 or PM_{10}.

The change in conditions results in NPOC emissions increase of 0.544 tons/yr, or about 4.2 lbs/day for the two sources. Averaged out over the 2 sources, the potential to emit per source is well below 10 pounds per highest day. Therefore, BACT is not triggered for NPOC.

OFFSETS

Per Regulation 2-2-302, offsets must be provided for any new or modified source at a facility that emits more than 10 tons/yr of POC or NOx. Because the only increase in emissions from this modification is NPOC, offsets are not required for this application.

STATEMENT OF COMPLIANCE

This equipment at this facility is in ongoing compliance with Regulation 8, Rule 11 (Metal Container, Closure and Coil Coating), section 301. The previous permit conditions listed the requirements of the alternative emission control plan as allowed under section 305, however this plan is not currently in use. The facility is aware that, should they wish to invoke this provision in the future, they would need to submit a plan for review and approval on an annual basis. Because the facility is in compliance with the VOC limits outlined in section 301, the alternative emission control plan requirements will not be listed in the new condition.

Specifically referring to the inks used in S-68 and S-69, Regulation 8-11-301 does not have an expressed VOC content limit. Therefore, ongoing compliance at these sources is expected.

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA (BAAQMD Permit Handbook, Chapter 5.1).

The project is over 1,000 feet from the nearest school and therefore not subject to the public notification requirements of Reg. 2-1-412.

A Toxics Risk Screening Analysis is not required due to the emissions at the rates discussed above.

40 CFR Part 60, Subpart WW, Standards of Performance for the Beverage Can Surface Coating Industry is applicable to exterior base coat, overvarnish coating, inside spray coating operations. This NSPS does not apply to the application of acetone as clean-up solvent.

PSD, Offsets, and NESHAPS do not apply to this project.

TITLE V IMPLICATIONS

Ball Metal Beverage Container Corp has an existing Title V permit. In accordance with Regulation 2, a determination must be made whether this change constitutes an administrative permit amendment, a significant permit revision, or a minor permit revision. Administrative permit amendments are defined as non-substantive amendments to a major facility review permit. Examples include formatting and typographical corrections, updates that remove outdated material such as sunset clauses and sources no longer in use, and identification of administrative changes at a facility. While there are portions of this application that do constitute an administrative permit amendment (such as redefining emission limits from gallons of inks to pounds of POC), the application must be further evaluated to determine whether is constitutes a permit revision.

Regulation 2-6-226 defines a significant revision. This application has no effect on allowable emissions of a Regulated NSR Pollutant, and so does not apply as a significant revision under 226.1 or 226.2. It also does not apply under 226.3 since the changes made to the permit condition have no effect on monitoring, reporting, or recordkeeping. This application does not establish or change any permit condition designed to avoid the classification as a modification. Therefore, definition 226.4 does not apply. Similarly, no case-by-case or facility-

specific determinations were made with regards to this application as described in 226.5 and 226.6. Nor were any requirements promulgated by the U.S. EPA under the Clean Air Act incorporated into the permit through this application as described in 226.7.

Since the application does not meet any of the definitions described in 2-6-226, and revisions were made in addition to those listed above as administrative permit amendments, the application constitutes a minor permit revision. Because this is a minor permit revision, the facility can begin operating in accordance with the changes immediately.

PERMIT CONDITIONS

COND# 26111 ----------

Ball Metal Container Division
Plant #148
Conditions for sources S-68 and S-69, Ink Dot Printers

1. ***Total POC emissions resulting from ink dot usage associated with S-68 and S-69 shall not exceed 1,018 pounds totaled over any consecutive twelve month period.***

2. ***In addition to the limit in part 1, the owner/operator shall not exceed the following usage limits, including ink dot, during any consecutive twelve-month period:***
   164 gallons of acetone

3. ***The total POC and NPOC emissions resulting from ink dot and acetone associated with the sources cited in part #1 shall be recorded on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request.***

RECOMMENDATION

Issue a Change of Conditions to Ball Metal Beverage Container Corp by archiving condition numbers 18645 and 20955, and assigning condition number 26111 to S-68 and S-69.

By: Simon Margolis Date: 8/8/2016

Simon Margolis
Air Quality Engineer