



April 30, 2018

Beverly McKeone
NSR Permitting Program Manager
WVDEP - Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Re: Ardagh Metal Packaging USA, Inc. (Plant ID 009-00012)
Class II Administrative Update to Permit R13-2410D
Administrative Amendment to R30-00900012-2017

Dear Ms. McKeone:

Ardagh Metal Packaging USA, Inc. wishes to make the following Class II Administrative Updates to permit number R13-2410D and Administrative Amendments to R30-00900012-2017. These changes are due to the replacement of Thermal Oxidizer 2 (Emission Unit 2C), control device for Coating Line 3 – C3 (Emission Unit 17S). The new oxidizer unit will maintain the same destruction efficiency at the same operating temperature as the current unit. A description of the proposed permit changes are outlined below.

Class II Administrative Updates to R13-2410D

Section 4.1.9 Table - The facility is requesting an increase in hourly and annual emissions of criteria pollutants associated with Thermal Oxidizer 2C, due to the increased heat input and natural gas consumption of the unit. The emissions changes are reflected in the emissions summary table in Section 4.1.9 of R13-2410D.

Section 4.1.12 Table - The new oxidizer has a different heat input and natural gas consumption rate. These changes are reflected in the table in Section 4.1.12 of R13-2410D. The maximum heat input has changed from 6 to 9 MMBTU/hour and the maximum natural gas consumed has increase from 6,000 to 8,000 cubic feet/hour.

Administrative Amendments to R30-00900012-2017

Section 5.1.1 Table- The requested emissions increase outlined under Section 4.1.9 of the R13 permit above, is also reflected in the table under Section 5.1.1 of the Title V permit.

Section 5.1.2 Table - The changes to the maximum heat input and natural gas consumption rate requested in Section 4.1.12 of the R13 permit above, are also reflected in the table under Section 5.1.2 of the Title V permit.

Please see Attachment N of the application package for detailed emissions calculations demonstrating that the emissions increases do not exceed the modification thresholds of six (6) pounds per hour (lb/hr) and ten (10) tons per year (tpy) or 144 lb/day provided in 45 CSR 13-2.17. Therefore, the proposed project does not constitute a modification under 45 CSR 13-2.17 and can be incorporated through a Class II Administrative Update to R13-2410D.

Please find enclosed one (1) hard copy and two (2) CDs containing the Class II Administrative Update and Title V Permit Administrative Amendment applications with the required attachments and forms. A permit application fee payment of \$300 is also enclosed.

If you need additional information feel free to contact myself at 304-797-1820 ext. 2232 or Melissa Vargo of NGE at 412-722-1970.

Best regards,

A handwritten signature in black ink that reads "David McClain". The signature is written in a cursive style with a large, looped initial "D".

Dave McClain
Plant Manager/Responsible Official

CC: Corr File

Enclosed: Permit Application Fee Payment
 Class II Administrative Update Application and Attachments

**R13 Class II Administrative Amendment/
Title V (R30) Administrative Amendment Application**

**Ardagh Metal Packaging USA, Inc.
3030 Birch Drive
Weirton, West Virginia**

April 2018



Prepared by:
NGE, LLC
171 Montour Run Road
Moon Township, PA 15108
(412) 722-1970
(412) 722-1929 FAX

Table of Contents

General Applicant Information	Sections I-III
Business Certificate	Attachment A
Plot Plan (No changes)	Attachment E
Detailed Process Flow Diagram	Attachment F
Process Description.....	Attachment G
Emission Units Table	Attachment I
Emission Points Data Summary Sheet.....	Attachment J
Air Pollution Control Device Sheet	Attachment M
Supporting Emission Calculations	Attachment N
Public Notice.....	Attachment P
Title V Revision Information	Attachment S

Attachments Not Applicable to this Application: Attachments C, D, H, K, L, O, Q and R

List of Appendices

- Appendix A – Attachments Not Applicable to this Application
- Appendix B – Red Line Copy of R13-2410D
- Appendix C – Red Line Copy of Title V Permit
- Appendix D – CD Copies of Application



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

**APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):

- CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): Ardagh Metal Packaging USA Inc		2. Federal Employer ID No. (FEIN): 25-186-4585	
3. Name of facility (if different from above): Weirton Plant		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: 3030 Birch Drive Weirton, WV 26062		5B. Facility's present physical address: 3030 Birch Drive Weirton, WV 26062	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A . – If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation:			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, please explain: Owner/Operator leases the building from ArcelorMittal (Half Moon Industrial Park) – If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): The facility is a metal can coating facility.		10. North American Industry Classification System (NAICS) code for the facility: 332431	
11A. DAQ Plant ID No. (for existing facilities only): 009-00012		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2410D, R30-00900012-2017	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A.

- For **Modifications, Administrative Updates or Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction or Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP as Attachment B**.

Located at Half Moon Industrial Park – US Route 22 to Half Moon Road to Signode Road.

12.B. New site address (if applicable):

12C. Nearest city or town:

12D. County:

12.E. UTM Northing (KM):

12F. UTM Easting (KM):

12G. UTM Zone:

13. Briefly describe the proposed change(s) at the facility:

This application includes details and specifications regarding the installation of a new oxidizer for 3C.

14A. Provide the date of anticipated installation or change: 06/30/2018

- If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: / /

14B. Date of anticipated Start-Up if a permit is granted:

07/09/2018

14C. Provide a **Schedule** of the planned **Installation of/Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:

Hours Per Day 24 Days Per Week 7 Weeks Per Year 52

16. Is demolition or physical renovation at an existing facility involved? YES NO

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*if known*). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (*if known*). Provide this information as **Attachment D**.

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to **Plot Plan Guidance**) .

- Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.

- Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.
– For chemical processes, provide a MSDS for each compound emitted to the air. Not applicable, no raw material changes

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

- | | | |
|--|--|--|
| <input type="checkbox"/> Bulk Liquid Transfer Operations | <input type="checkbox"/> Haul Road Emissions | <input type="checkbox"/> Quarry |
| <input type="checkbox"/> Chemical Processes | <input type="checkbox"/> Hot Mix Asphalt Plant | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant | <input type="checkbox"/> Incinerator | <input type="checkbox"/> Storage Tanks |
| <input type="checkbox"/> Grey Iron and Steel Foundry | <input type="checkbox"/> Indirect Heat Exchanger | |
| <input type="checkbox"/> General Emission Unit, specify | | |

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

- | | | |
|---|---|--|
| <input type="checkbox"/> Absorption Systems | <input type="checkbox"/> Baghouse | <input type="checkbox"/> Flare |
| <input type="checkbox"/> Adsorption Systems | <input type="checkbox"/> Condenser | <input type="checkbox"/> Mechanical Collector |
| <input checked="" type="checkbox"/> Afterburner | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |

Other Collectors, specify

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

- Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES NO

- If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's **"Precautionary Notice – Claims of Confidentiality"** guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

- | | |
|--|---|
| <input type="checkbox"/> Authority of Corporation or Other Business Entity | <input type="checkbox"/> Authority of Partnership |
| <input type="checkbox"/> Authority of Governmental Agency | <input type="checkbox"/> Authority of Limited Partnership |

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE David McClain DATE: 4-30-18
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: David McClain		35C. Title: Plant Manager
35D. E-mail: david.mcclain@ardaghrup.com	36E. Phone: 304-797-1820	36F. FAX: 304-797-0518
36A. Printed name of contact person (if different from above): Craig Walsh		36B. Title: EHS Manager
36C. E-mail: craig.walsh@ardaghrup.com	36D. Phone: 310-519-2448	36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

<input checked="" type="checkbox"/> Attachment A: Business Certificate	<input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet
<input type="checkbox"/> Attachment B: Map(s)	<input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)
<input type="checkbox"/> Attachment C: Installation and Start Up Schedule	<input checked="" type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)
<input type="checkbox"/> Attachment D: Regulatory Discussion	<input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations
<input checked="" type="checkbox"/> Attachment E: Plot Plan	<input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans
<input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)	<input checked="" type="checkbox"/> Attachment P: Public Notice
<input checked="" type="checkbox"/> Attachment G: Process Description	<input type="checkbox"/> Attachment Q: Business Confidential Claims
<input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)	<input type="checkbox"/> Attachment R: Authority Forms
<input checked="" type="checkbox"/> Attachment I: Emission Units Table	<input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information
<input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet	<input checked="" type="checkbox"/> Application Fee

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

Forward 1 copy of the application to the Title V Permitting Group and:

For Title V Administrative Amendments:

NSR permit writer should notify Title V permit writer of draft permit,

For Title V Minor Modifications:

Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,

NSR permit writer should notify Title V permit writer of draft permit.

For Title V Significant Modifications processed in parallel with NSR Permit revision:

NSR permit writer should notify a Title V permit writer of draft permit,

Public notice should reference both 45CSR13 and Title V permits,

EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Attachment A
Business Certificate

**WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION
CERTIFICATE**

ISSUED TO:
**ARDAGH METAL PACKAGING USA INC
3030 BIRCH DR
WEIRTON, WV 26062-5133**

BUSINESS REGISTRATION ACCOUNT NUMBER: 1023-7113

This certificate is issued on: **06/16/2015**

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code*

*The person or organization identified on this certificate is registered
to conduct business in the State of West Virginia at the location above.*

This certificate is not transferrable and must be displayed at the location for which issued

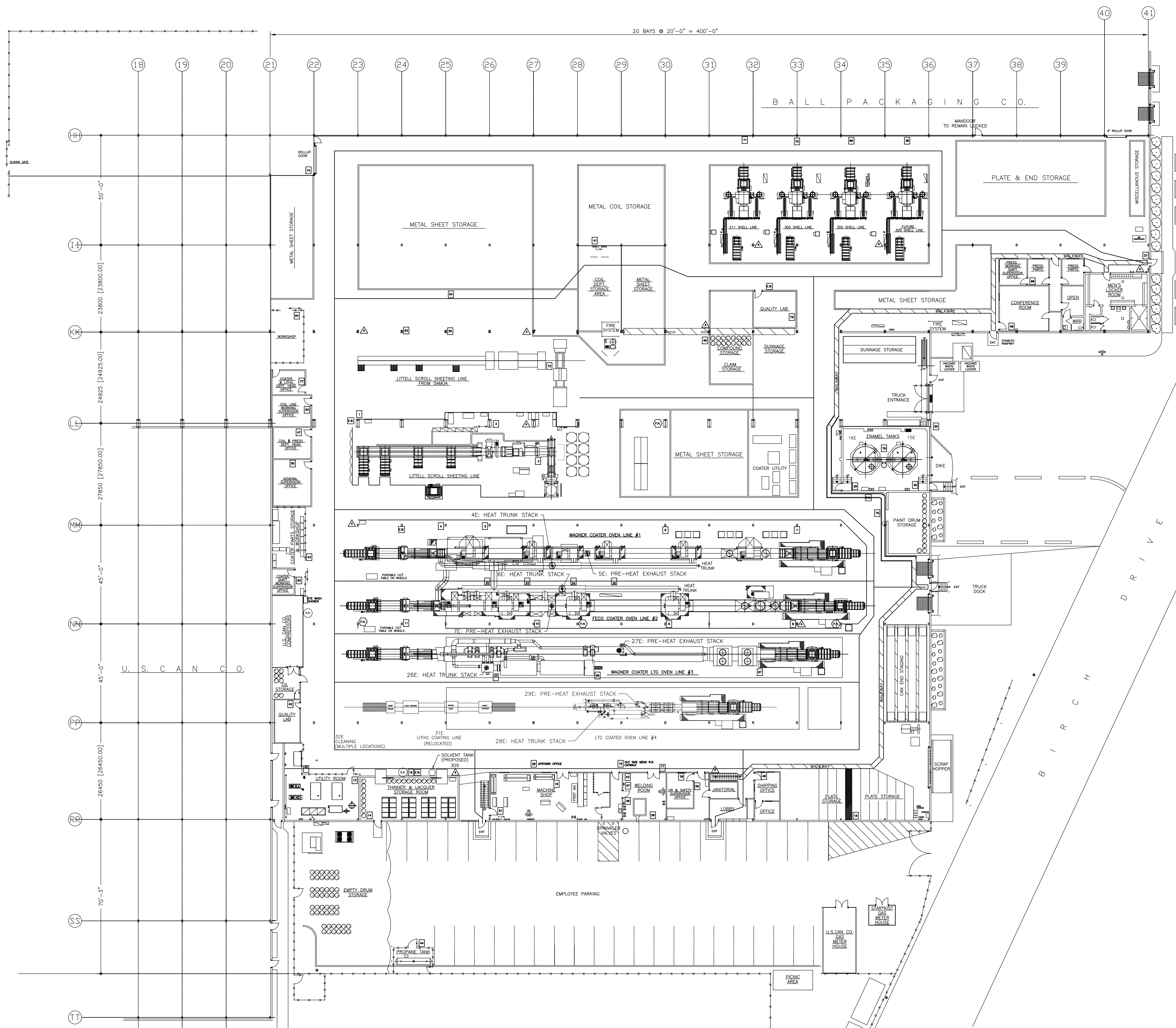
This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

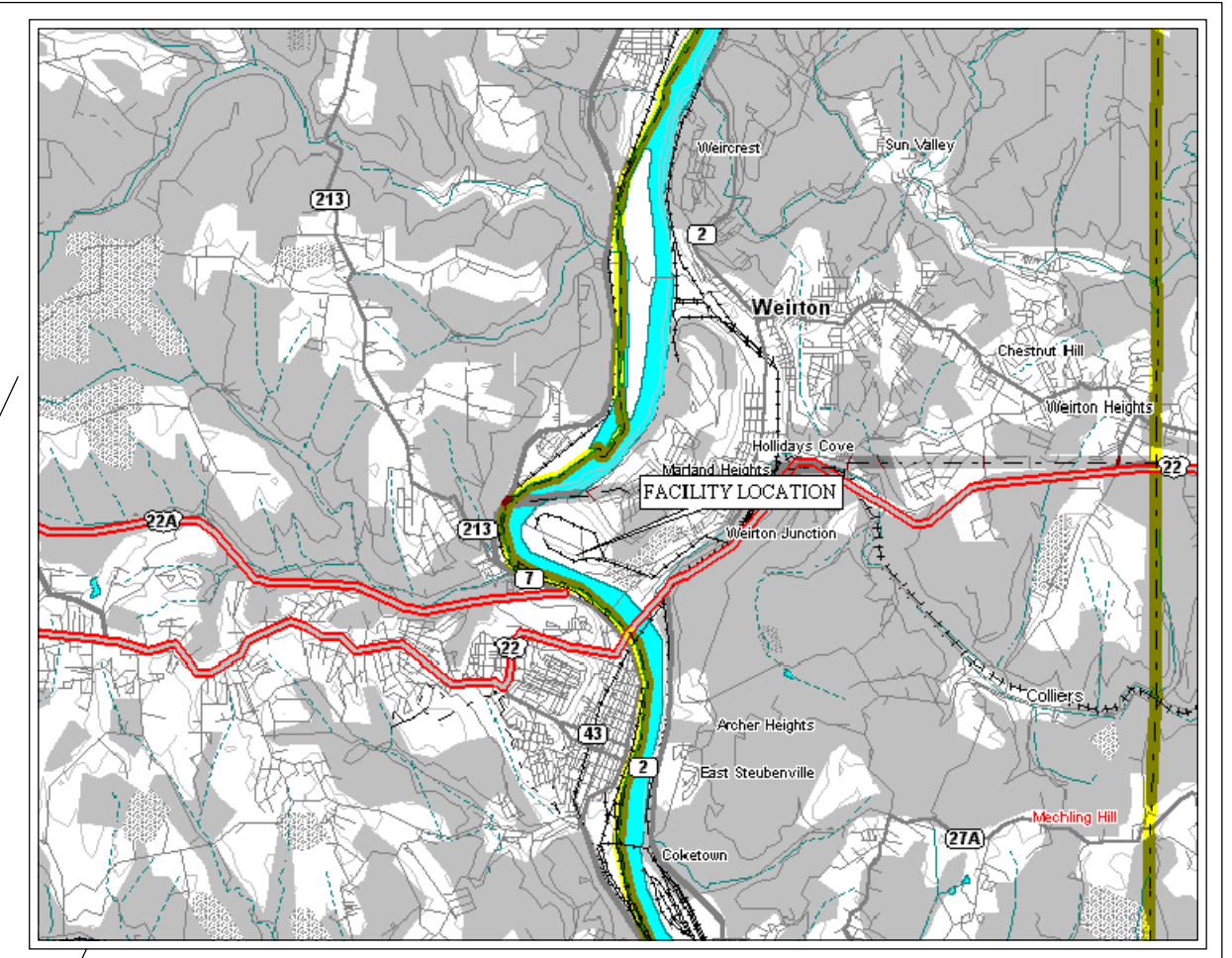
Attachment E
Plot Plan

XREF FILE: IMAGE FILE: WEIRTON.rvt
 FILE: D:\P\105-0472-IMPRESS\work\25M10020-2.dwg
 PLOTTED BY: MBRONSKI

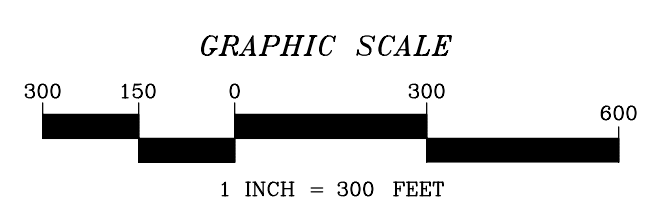
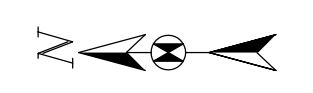


E V A C U A T I O N L A Y O U T

PLAN VIEW



VICINITY MAP
(NOT TO SCALE)



DRAWING REFERENCE:
 BASE DRAWING PROVIDED BY STAR-KIST FOODS,
 CAN TECH SERVICES
 DRAWING NO. 25M10020-2, DATED 12/17/99.

CAD File No.	Drawn
	Checked
	Approved
	1"=300" Scale:
	Date:
Project No.	

IMPRESS USA, INC.
 WEIRTON, WEST VIRGINIA

PLAN VIEW
 WEIRTON PLANT

1
 Drawing No.

Attachment F
Detailed Process Flow Diagram

Ardagh Metal Packaging USA, Inc.

Process Flow Diagram



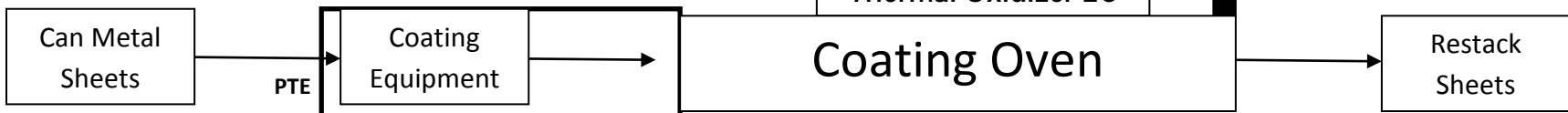
Coating Line No. 2 – C2 (2S)

Natural Gas Fuel Consumption - 15,000ft³/hr
 Production - 7,300 sheets/hr



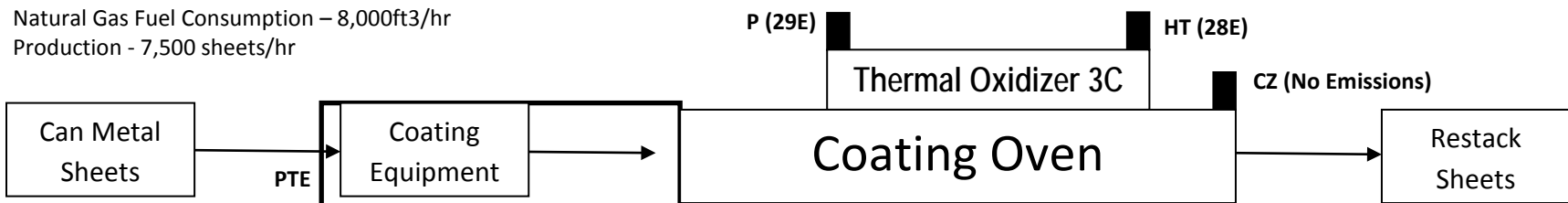
Coating Line No. 1 – C1 (1S)

Natural Gas Fuel Consumption – 15,000ft³/hr
 Production - 7,300 sheets/hr



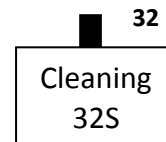
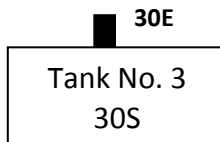
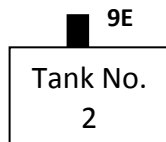
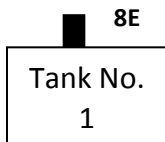
Coating Line No. 3 – C3 (17S)

Natural Gas Fuel Consumption – 8,000ft³/hr
 Production - 7,500 sheets/hr



Coating Line No. 4 – C4 (18S) with Litho Coater (31S)

Natural Gas Fuel Consumption – 6,000ft³/hr
 Production - 7,500 sheets/hr



PTE – Permanent Total Enclosure
 P – Preheat Exhaust Stack
 HT – Heat Trunk Stack
 CZ – Cooling Zones

Attachment G

Process Description

Process Description

The Ardagh facility located in Weirton, West Virginia, is a metal coating plant, specializing in processed foods. The operating lines (Line No. 1 through 4) include the coating operation and drying operations. Uncoated sheets of metal, varying in size, are fed through the line. The sheets are coated, dried and restacked. Coating Line No. 4 operates in line with the existing Litho Coating Line. The Litho Coating Line is a printer, which prints on the sheet metal prior to the coating being applied.

The design capacity of each coating line is approximately 7,300 sheets per hour (7,500 sheets per hour for Coating Lines No. 3 and 4). These sheets are coated with the proper coating (interior or exterior) and quantity according to customer specifications. From the coating equipment, the sheets are roller fed to the drying oven. A permit modification was submitted in 2008 for the installation of a permanent total enclosure (PTE) around Lines 1 through 4 in order to obtain 100% capture efficiency for volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions. The PTE encloses the area from the coating machine to the drying oven. The Litho Line is not located within the PTE.

All of the thermal oxidizers are fueled by natural gas. Capture and destruction efficiency testing was initially conducted October 2-4, 2007 to verify the effectiveness of the PTE and to confirm the destruction efficiency of the thermal oxidizers. The test confirmed that the PTE met the USEPA Method 204 criteria and 100% capture efficiency was achieved. In addition, destruction efficiencies and minimum combustion chamber temperatures for the thermal oxidizers were determined. The oxidizers were last tested in December 2016 following the Title V renewal application. Regulation 13 Permit R13-2410D and Title V permit R30-00900012-2017 require that the temperature of the combustion chamber of C1, associated with Coating Lines No. 1 and 2, be a minimum of 1400°F, and that a control efficiency of 95% be achieved. Oxidizer C2, the control device for Coating Line #3 will be replaced in 2018. The temperature of the combustion chamber of C2, associated with Coating Line #3, will remain a minimum of 1350°F, with a control efficiency of 98%. The temperature of the combustion chamber of control device C3, associated with Coating Line No. 4, is currently a minimum of 1275°F, and a control efficiency of 99% is required.

Emission points for C1 are identified as 4E (Preheat Exhaust Stack) and 5E (Heat Trunk Exhaust Stack) for Coating Line No.1 and 6E (Preheat Exhaust Stack) and 7E (Heat Trunk Exhaust Stack) for Coating Line No. 2. Emission points for C2 are identified as 23E and 24E. Emission points for C3 are identified as 28E and 29E. The exhaust for the Litho Line is identified as 31E and does not have control device.

Chemical coating arrive onsite in drums, totes or via bulk delivery, is used in large quantity. This application includes an updated list of coating in use at the facility. Some coatings listed in the coating use summary table in Section 4.1.7 of the Title V permit are obsolete, while new coatings have been added. Three (3) aboveground storage tanks, identified as Tank No 1 (EU 15S), Tank No. 2 (EU 16S) and Tank No.3 (EU 30S) contain various coatings (EUs 15S and 16S) and Glycol Ether (EU 30S).

The facility utilizes a maximum of 16,500 gallons per year of cleaning solvents for all coating lines and the litho line. Cleaning operations are identified as EU 32S. A conservative release rate of 50% is assumed based on material balance calculations performed by the facility.

Attachment I
Emission Units Table

Attachment I

Emission Units Table

(includes all emission units and air pollution control devices that will be part of this permit application review, regardless of permitting status)

Emission Unit ID ¹	Emission Point ID ²	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type ³ and Date of Change	Control Device ⁴
2C (control device associated with Emission Unit 17S)	23E and 24E for	Thermal Oxidizer No. 2	2018	9 MMBtu/hr	Replacement of old oxidizer with a new one outlined in this application. The new oxidizer has a different natural gas consumption and there will be a slight increase in emissions. The oxidizer is expected to be installed in June 2018.	NA - Emission Unit is a Control Device

¹ For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation.
² For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation.
³ New, modification, removal
⁴ For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

Attachment J
Emission Points Data Summary Sheet

**Attachment J
EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data															
Emission Point ID No. <i>(Must match Emission Units Table & Plot Plan)</i>	Emission Point Type ¹	Emission Unit Vented Through This Point <i>(Must match Emission Units Table & Plot Plan)</i>		Air Pollution Control Device <i>(Must match Emission Units Table & Plot Plan)</i>		Vent Time for Emission Unit <i>(chemical processes only)</i>		All Regulated Pollutants - Chemical Name/CAS ³ <i>(Speciate VOCs & HAPS)</i>	Maximum Potential Uncontrolled Emissions ⁴		Maximum Potential Controlled Emissions ⁵		Emission Form or Phase <i>(At exit conditions, Solid, Liquid or Gas/Vapor)</i>	Est. Method Used ⁶	Emission Concentration ⁷ <i>(ppmv or mg/m⁴)</i>
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
2C	Vertical	17S (C3)	Coating Line 3	2C	Thermal Oxidizer	NA	NA	VOCs	0.04	0.19			Gas/Vapor	AP-42	NA
								PM 10	0.06	0.27			Gas/Vapor	AP-42	NA
								SO2	0.01	0.021			Gas/Vapor	AP-42	NA
								NOx	0.4	1.75			Gas/Vapor	AP-42	NA
								CO	0.67	2.94			Gas/Vapor	AP-42	NA

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

¹ Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

² Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

- ³ List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. **DO NOT LIST** H₂, H₂O, N₂, O₂, and Noble Gases.
- ⁴ Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- ⁵ Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- ⁶ Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).
- ⁷ Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10).

Attachment J EMISSION POINTS DATA SUMMARY SHEET

Table 2: Release Parameter Data								
Emission Point ID No. <i>(Must match Emission Units Table)</i>	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow ¹ (acfm) <i>at operating conditions</i>	Velocity (fps)	Ground Level <i>(Height above mean sea level)</i>	Stack Height ² <i>(Release height of emissions above ground level)</i>	Northing	Easting
2C	No change	365	6900	382	No change to stacks			

¹ Give at operating conditions. Include inerts.
² Release height of emissions above ground level.

Attachment M
Air Pollution Control Device Sheet

Attachment M
Air Pollution Control Device Sheet
(AFTERBURNER SYSTEM)

Control Device ID No. (must match Emission Units Table): 3C

Equipment Information

1. Manufacturer: TANN Corporation. Model No. TO855	2. <input type="checkbox"/> Thermal Energy Recovery <input checked="" type="checkbox"/> Recuperative (Conventional) <input type="checkbox"/> Catalytic
3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.	
4. Combustion chamber dimensions: Length: 13.25 ft Diameter: 4.8 ft Cross-sectional area: ft ²	5. Stack Dimensions: Height: ft Diameter: 2 ft
6. Combustion (destruction) efficiency: Estimated: 98 % Minimum guaranteed: 98 %	7. Retention or residence time of materials in combustion chamber: Maximum: 0.52 sec Minimum: 0.52 sec
8. Throat diameter: ft	9. Combustion Chamber Volume: ft ³
10. Fuel used in burners: <input checked="" type="checkbox"/> Natural Gas <input type="checkbox"/> Fuel Oil, Number: <input type="checkbox"/> Other, specify:	11. Burners per afterburner: Number of burners: 1 BTU/hr for burner: 9.0 MM BTU/hr
12. Fuel heating value of natural gas: 1000 Btu/cu.ft. BTU/lb	13. Flow rate of natural gas: 97 ft ³ /min
14. Is a catalyst material used?: <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, catalyst material used: ?	15. Expected frequency of catalyst replacement: yr(s)
17. Space Velocity of the catalyst material used: 1/hour	16. Date catalyst was last replaced: Month/Year:
	18. Catalyst area: ft ²
20. Minimum loading: Maximum loading:	19. Volume of catalyst bed: ft ³
	21. Temperature catalyst bed inlet: °F Temperature catalyst bed outlet: °F
22. Explain degradation or performance indicator criteria determining catalyst replacement:	
23. Heat exchanger used? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe heat exchanger: See Attachment G	24. Heat exchanger surface area? 2656 ft ²
	25. Average thermal efficiency: %
26. Temperature of gases: After preheat: ~365 °F Before preheat: ~216 °F	
27. Dilution air flow rate: ft ³ /minute	
28. Describe method of gas mixing used: N/A?	

Waste Gas (Emission Stream) to be Burned

29.	Name	Quantity Grains of H ₂ S/100 ft ²	Quantity-Density (LB/hr, ft ³ /hr, etc)	Source of Material
	VOC	NA	6.1 lb/hr	Coating Line 3
	HAPs	NA	2.71 lb/hr	Coating Line 3
30. Estimate total combustibles to afterburner 440.45 lb/hr or ACF/hr				
31. Estimated total flow rate to afterburner or catalyst including materials to be burned, carrier gases, auxiliary fuel, etc.: lb/hr, ACF/hr, or scfm Total flow rate = Flue gas flow rate				
32. Afterburner operating parameters:				
			During maximum operation of feeding unit(s)	During typical operation of feeding unit(s)
	Combustion chamber temperature in °F			1,350
	Emission stream gas temperature in		365	365
	Combined gas stream entering catalyst bed in			NA
	Flue stream leaving the catalyst bed			NA
	Emission stream flow rate (scfm)		8000	6900
	Efficiency (VOC Reduction)		%	98 %
	Efficiency (Other; specify contaminant)		%	%
33. Inlet Emission stream parameters:				
		Maximum	Typical	
	Pressure (mmHg):	29.7	29.7	
	Heat Content (BTU/scf):	1000	1000	
	Oxygen Content (%):	18	18	
	Moisture Content (%):	4.4	4.4	
	Are halogenated organics present?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	Are particulates present?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	Are metals present?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
34. For thermal afterburners, is the combustion chamber temperature continuously monitored and recorded? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
35. For catalytic afterburners, is the temperature rise across the catalyst bed continuously monitored and recorded? <input type="checkbox"/> Yes <input type="checkbox"/> No				
36. Is the VOC concentration of exhaust monitored and recorded? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
37. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification): None				
38. Describe the collection material disposal system: VOC and HAPs are oxidized with no resultant ash or solid waste byproduct created				
39. Have you included Afterburner Control Device in the Emissions Points Data Summary Sheet? Yes				

40. Proposed Monitoring, Recordkeeping, Reporting, and Testing
 Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

<p>MONITORING: See Attachment S.</p>	<p>RECORDKEEPING: Recordkeeping unchanged from existing permit requirements</p>
---	--

<p>REPORTING: Reporting unchanged from existing permit requirements</p>	<p>TESTING: Testing unchanged from existing permit requirements</p>
--	--

<p>MONITORING:</p>	<p>Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.</p>
<p>RECORDKEEPING:</p>	<p>Please describe the proposed recordkeeping that will accompany the monitoring.</p>
<p>REPORTING:</p>	<p>Please describe any proposed emissions testing for this process equipment on air pollution control device.</p>
<p>TESTING:</p>	<p>Please describe any proposed emissions testing for this process equipment on air pollution control device.</p>

41. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.
 NA

42. Manufacturer's Guaranteed Control Efficiency for each air pollutant.
 NA

43. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.
 NA

Attachment N
Supporting Emission Calculations

Ardagh Metal Packaging USA, Inc.
Weirton, WV
Permit Modification

New and hourly and annual emissions from the combustion of natural gas from the operation of Thermal Oxidizer #2.

Natural Gas Combustion Emissions from Thermal Oxidizer #2 (Unit ID: C2)

Operating Schedule:	8,760 hrs/yr
Heat Rating:	9,000,000 BTU/hr
Heat Content of Natural Gas:	1,000 BTU/ft ³
Hourly Gas Consumption Rate:	8,000 ft ³ /hr
Required Gas per Hour:	0.008 (10 ⁶ ft ³ /hr)
Required Gas per Year:	70.08 (10 ⁶ ft ³ /yr)

Pollutant	Emission Factor (lb/10⁶ scf)⁽¹⁾	Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Criteria Air Pollutants			
PM/PM10	7.6	0.06	0.27
CO	84	0.67	2.94
SO2	0.6	0.01	0.021
NOX ⁽²⁾	50	0.40	1.75
VOC	5.5	0.04	0.19
Hazardous Air Pollutants			
2-Methylnaphthalene	2.40E-05	0.00000019	0.00000084
3-Methylchloranthrene	1.80E-06	0.00000002	0.00000007
7,12-Dimethylbenz(a)anthracene	1.60E-05	0.00000013	0.00000056
Acenaphthene	1.80E-06	0.00000002	0.00000007
Acenaphthylene	1.80E-06	0.00000002	0.00000007
Anthracene	2.40E-06	0.00000002	0.00000009
Benz(a)anthracene	1.80E-06	0.00000002	0.00000007
Benzene	2.10E-03	0.00001680	0.00007358
Benzo(a)pyrene	1.20E-06	0.00000001	0.00000004
Benzo(b)fluoranthene	1.80E-06	0.00000002	0.00000007
Benzo(g,h,i)perylene	1.20E-06	0.00000001	0.00000004
Benzo(k)fluoranthene	1.80E-06	0.00000002	0.00000007
Chrysene	1.80E-06	0.00000002	0.00000007
Dibenzo(a,h)anthracene	1.20E-06	0.00000001	0.00000004
Dichlorobenzene	1.20E-03	0.00000960	0.00004205
Fluoranthene	3.00E-06	0.00000002	0.00000011
Fluorene	2.80E-06	0.00000002	0.00000010
Formaldehyde	7.50E-02	0.00060000	0.00262800
Hexane	1.80E+00	0.01440000	0.06307200
Indeno(1,2,3-cd)pyrene	1.80E-06	0.00000002	0.00000007
Naphthalene	6.10E-04	0.00000488	0.00002137
Phenanathrene	1.70E-05	0.00000014	0.00000060

Pollutant	Emission Factor (lb/10⁶ scf) ⁽¹⁾	Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Pyrene	5.00E-06	0.00000004	0.00000018
Toluene	3.40E-03	0.00002720	0.00011914
Total VOC HAPS		0.02	0.07
Arsenic	2.00E-04	0.00000160	0.00000701
Beryllium	1.20E-05	0.00000010	0.00000042
Cadmium	1.10E-03	0.00000880	0.00003854
Chromium	1.40E-03	0.00001120	0.00004906
Cobalt	8.40E-05	0.00000067	0.00000294
Manganese	3.80E-04	0.00000304	0.00001332
Mercury	2.60E-04	0.00000208	0.00000911
Nickel	2.10E-03	0.00001680	0.00007358
Selenium	2.40E-05	0.00000019	0.00000084
Total PM HAPS		0.00005	0.00020
Total HAPS		0.02005	0.07020

1. Emission factors from AP-42, External Combustion Sources (Chapter 1), Section 1.4 Natural Gas Combustion dated 7/98.
2. The burner is a Low-NOx burner.

Attachment P
Public Notice

Herald Star/Weirton Daily Times Legal Ads Print Ad Proof

ADNo: 180800 Customer Number: L01604
 Customer Name: ARDAGH METAL PACKAGING USA INC Company:
 Address: 3030 BIRCH DRIVE ATTN: DAVID MCCLAIN
 City/St/Zip: WEIRTON ,WV 26062
 Phone: (304) 797-1820 Solicitor: 24
 Category: 80 Class: 599 Rate: WL-0 Start: 5-3-2018 Stop: 5-3-2018
 Lines: 49 Inches: 4.86 Words: 239

Credit Card: _____ Expire: _____
 Order Number: _____
 Cost: 33.52 Extra Charges: .00 Adjustments: 2.00
 Payments: .00 Discount: .00
 Balance: 35.52

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that Ardagh Metal Packaging USA Inc. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Class II Administrative Update to their existing R13-2410D permit and an Administrative Amendment to their existing R30-00900012-2017 permit, located on 3030 Birch Drive, Half Moon Industrial Park in Brooke County, West Virginia. The latitude and longitude coordinates are: 40.388611 deg. N and 80.623333 deg. W.

The applicant is applying for the Class II Administrative Update and Administrative Amendment in order to replace one of its current oxidizers with a new one. This change includes an insignificant emissions increase of 0.05 tons per year (tpy) of volatile organic compounds, 0.44 tpy increase in NOx, 0.73 tpy increase of CO, 0.07 tpy increase of PM/PM10, and 0.001 tpy increase of SO2 emissions.

Startup of the new oxidizer planned to begin in July 2018. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours. Dated this the 30th day of April, 2018.

By: Ardagh Metal Packaging
 USA Inc.
 David McClain
 Plant Manager
 3030 Birch Drive
 Weirton, WV 26062

5-3, 2018 Adv.

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Dated this the 30 day of April, 2018.

By: Ardagh Metal Packaging USA Inc.
David McClain
Plant Manager
3030 Birch Drive
Weirton, WV 26062

Note: Proof of submittal will be submitted to the WVDEP Division of Air Quality upon receipt.

Attachment S
Title V Revision Information

Attachment S
Title V Permit Revision Information

1. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)
⁽¹⁾ If this box is checked, please include Compliance Assurance Monitoring (CAM) Form(s) for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why Compliance Assurance Monitoring is not applicable:	

2. Non Applicability Determinations
<p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p>
<input type="checkbox"/> Permit Shield Requested <i>(not applicable to Minor Modifications)</i>

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? Yes No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Control Device ID	Control Device Description	Year Installed	Design Capacity
1 C	Thermal Oxidizer No.I (Incinerator)	1979	15 MMBtulhr
2 C	Thermal Oxidizer No.2 (LTG Technologies Maxon Incinerator #8m TANN Corp Recuperative Thermal Oxidizer TO855)	1997 2018	6.0 9 MMBtulhr
3 C	Thermal Oxidizer No.3	2001	6.0 MMBtulhr

5.1.1. Emissions of criteria pollutants from the facility thermal oxidizers shall not exceed the following:

Emission Point ID	VOC		PM10		CO		SO2		NOx	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
4E, 5E, 6E, 7E	0.08	0.36	0.11	0.50	1.26	5.52	0.01	0.04	1.50	6.57
23E, 24E	0.03 0.04	0.14 0.19	0.05 0.06	0.20 0.27	0.50 0.67	2.21 2.94	0.01	0.02 .021	0.30 0.40	1.31 1.75
28E, 29E	0.03	0.14	0.05	0.20	0.50	2.21	0.01	0.02	0.30	1.31

Compliance with 45CSR§6-4.1 (5.1.5.) will be shown by the more stringent requirements of Section 5.1.1.

[45CSR13, R13-2410, 4.1.9.]

5.1.2. The maximum heat input rates and maximum natural gas consumption rates for pollution control devices 1C, 2C and 3C shall not exceed the limits given below:

Can Coating Line	Pollution Control Device				
	ID#	Maximum Heat Input		Maximum Natural Gas Consumed	
		MMBtu/hr	MMBtu/year	Ft ³ /hr	MMft ³ /year
Lines 1&2 (ID#s 1S & 2S)	1C	15	131,400	15,000	131.4
Line3 (ID# 17S)	2C	6 9	52,560 78,840	6,000 8,000	52.56 70.08
Line4 (ID#	3C	6	52,560	6,000	52.56

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision		
Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-2410D	07/17/2015	
	/ /	
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision		
Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions	
Pollutant	Change in Potential Emissions (+ or -), TPY
VOC	+0.05 TPY
NOx	+0.44 TPY
CO	+0.73 TPY
PM/PM10	+0.07TPY
SO2	+0.001 TPY

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.


7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)

Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):	 <i>(Please use blue ink)</i>	Date:	4 / 30 / 18 <i>(Please use blue ink)</i>
Named (typed):	Dave McClain	Title:	Plant Manager

Note: Please check if the following included (if applicable):

- | | |
|-------------------------------------|---|
| <input type="checkbox"/> | Compliance Assurance Monitoring Form(s) |
| <input checked="" type="checkbox"/> | Suggested Title V Draft Permit Language |

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Appendix A
Attachments Not Applicable

Attachments Not Applicable to this Application: Attachments C, D, H, K, L, O, Q and R

Attachment C- Schedule of installation

This attachment is not applicable since there is only one unit being installed

Attachment D – Regulatory Discussion

This attachment is not applicable since there are no changes to the regulatory requirements.

Attachment H – Material Safety Data Sheets

This attachment is not applicable since there are no new Material Safety Data Sheets

Attachment K – Fugitive Emissions Data Summary Sheet

This attachment is not applicable since there are no changes to fugitive emissions

Attachment L – Emissions Unit Data Sheets

This attachment is not applicable There are no changes to these emissions units

Attachment O- Monitoring/Recordkeeping/Reporting/Testing Plans

This attachment is not applicable since there are no changes to these requirements

Attachment Q – Business Confidential Claims

This attachment is not applicable since there are no business confidential claims requested

Attachment R – Authority Forms

This attachment is not applicable since there are no changes to the authority.

Appendix B
Red Line Copy of R13-2410D

West Virginia Department of Environmental Protection

Joe Manchin, III
Governor

Division of Air Quality

Randy Huffman
Cabinet Secretary

Permit to Modify



R13-2410D

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 CS.R. 13- Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Ardagh Metal Packaging USA, Inc.

Weirton Facility

009-00012

A handwritten signature in black ink, appearing to read "William F. Durham", written over a horizontal line.

William F. Durham
Director

issued: July 27, 2015

This permit will supercede and replace Permits R13-2410C.

Facility Location: Weirton, Brooke County, West Virginia

Mailing Address: 3030 Birch Dr.
Weirton, WV 26062

Facility Description: Can coating facility

SIC Codes: 3411

UTM Coordinates: 531.83 km Easting • 4,470.82 km Northing • Zone 17

Permit Type: Modification

Description of

Change: Update permit to reflect variability of coating materials and update the ‘Product Storage’ column in Table 4.1.1; update permit for new HAPS; requests lower temperature requirement for Thermal Oxidizer 3C; increase VOC emissions limits for bulk storage tanks; and update the permit to reflect the most recent VOC Capture and Destruction Efficiency testing.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

Table of Contents

1.0. Emission Units	3
2.0. General Conditions	4
2.1. Definitions	4
2.2. Acronyms	4
2.3. Authority	5
2.4. Term and Renewal	5
2.5. Duty to Comply	5
2.6. Duty to Provide Information	5
2.7. Duty to Supplement and Correct Information	6
2.8. Administrative Permit Update	6
2.9. Permit Modification	6
2.10. Major Permit Modification	6
2.11. Inspection and Entry	6
2.12. Emergency	6
2.13. Need to Halt or Reduce Activity Not a Defense	7
2.14. Suspension of Activities	7
2.15. Property Rights	7
2.16. Severability	8
2.17. Transferability	8
2.18. Notification Requirements	8
2.19. Credible Evidence	8
3.0. Facility-Wide Requirements	9
3.1. Limitations and Standards	9
3.2. Monitoring Requirements	9
3.3. Testing Requirements	9
3.4. Recordkeeping Requirements	10
3.5. Reporting Requirements.....	11
4.0. Source-Specific Requirements	12
4.1. Limitations and Standards	12
4.2. Testing Requirements	17
4.3. Monitoring and Recordkeeping Requirements	17
CERTIFICATION OF DATA ACCURACY	19

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Control Device
1S	4E, 5E, 6E, 7E	Coater Oven Line 1 - C1	Thermal Oxidizer 1 (1C)
2S	4E, 5E, 6E, 7E	Coater Oven Line 2 - C2	Thermal Oxidizer 1 (1C)
17S	23E & 24E	Coater Oven Line 3 - C3	Thermal Oxidizer 2 (2C)
18S	28E & 29E	Coater Oven Line 4 - C4	Thermal Oxidizer 3 (3C)
32S	32E	Cleaning	None
31S	31E	Litho Coater/Printer	None
15S, 16S, 30S	8E, 9E & 30E	Tanks	None

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-2410C. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2410C and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

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

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13.
[45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit

and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
[WV Code § 22-5-4(a)(15)]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Operating Fee.**
- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. The following maximum annual coating and solvent throughputs and volatile organic compound (VOC) emission rates for the following bulk storage tanks shall not be exceeded:

Bulk Storage Tank ID	Emission Point ID Number	Product in Storage	Maximum Annual Limits	
			Coating Throughput (gal/yr)	VOC Emissions (lb/yr)
Tank No. 1 (15S)	8E	PPG4348807 Clear Enamel	200,000	342
Tank No. 2 (16S)	9E	96X069A	200,000	342
Tank No. 3 (30S)	30E	Glycol Ether (2-n-Butoxy-1-ethanol)	154,000	3.2

Note: The above table is a snapshot of coating storage at permit approval time. The permittee is allowed to change coating storage as long as the requirements given in sections 4.1.8., 4.1.9., and 4.1.10. of this permit are met.

- 4.1.2 The number of metal sheets coated via Line 1-C1 (ID# 1S) shall not exceed 7,300/hr.
- 4.1.3 The number of metal sheets coated via Line 2-C2 (ID# 2S) shall not exceed 7,300/hr.
- 4.1.4 The number of metal sheets coated via Line 3-C3 (Spot Coater C-3 Continuous Drying Oven Type DBL (150' x 6.5' x 10') (ID# 17S)) shall not exceed 7,500/hr.
- 4.1.5 The number of metal sheets coated via Line 4-C4 (ID# 18S) shall not exceed 7,500/hr.
- 4.1.6 The metal can sheet coating lines and associated control devices shall be installed, maintained, and operated so as to achieve the following minimum VOC capture efficiencies:

Can Coating Line	Minimum VOC Capture Efficiency	Minimum VOC Control Efficiency
Line 1-C1 (1S)	100%	95%
Line 2-C2 (2S)	100%	95%
Line 3-C3 (17S)	100%	98%
Line 4-C4 (18S)	100%	99%

4.1.7 The following coatings and solvents have been permitted for use on metal can sheet coating lines C1-C4 (ID# 1S, 2S, 17S, & 18S), and at the maximum usage rates given below:

Description	Maximum Usage Rate	Maximum VOC Usage Rate
	(gal/yr)	(lb/yr)
Coatings		
9200-014	1,600	8,640
13S07WF	50,000	180,000
ICI 642E118	200,000	720,000
9851-019	185,000	943,500
9434039	2,600	12,740
9851-577	4,800	24,480
8406026	55	292
8744-902	110	583
20S78AA	550	2,750
20S82AA	600	3,720
20S67WA	18,000	100,800
6256054	10,000	53,000
PPG G23	300	1,530
657 HE 1293	3,800	20,482
657HE 13501	8,300	39,840
5698014	39,800	131,340
9009-920	38,900	202,280
9851-579	5,000	26,000
646C140	3,000	16,416
9851589	2,000	10,608
92x111H	2,000	12,144
96X069A	200,000	695,942
Pastes, Lubricants, and		
4623105	1,100	5,610
1949101	7,000	23,100
6661011	210	1,365
7789001	300	1,080
Hi Sol 10	110	803

Description	Maximum Usage Rate	Maximum VOC Usage Rate
	(gal/yr)	(lb/yr)
Glycol Ether EB	46,000	346,395
Mineral Spirits 66/3	10,000	64,974
Aromatic 100	208	1,508
Isophorone	52	355
Arcosolve PM Acetate	6,000	47,981
Belt Cleaners		
Eastman MPK	330	371
Cleanup Solvents		
Reformulated 4212-1	16,000	112,160
IPA Anhydrous	5,000	32,900
UV Wash 5700	2,000	11,400
General Wash	2,000	13,800
Total		3,870,889

Note: The above table is a snapshot of coating usage at permit approval time. The permittee is allowed to change coatings and coating usage rates as long as the requirements given in sections 4.1.8., 4.1.9., and 4.1.10. of this permit are met.

- 4.1.8 Use of any surface coating, paste, lubricant, thinner, solvent or cleaner containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed below shall be in accordance with the following:
- a. The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
 - b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.

HAP	CAS Number	HAP	CAS Number
Cumene	98828	Xylene	1330207
Ethyl Benzene	100414	Isophorone	78591
Methyl Isobutyl Ketone	108101	Naphthalene	91203
Glycol Ethers	NA	*Cresol	1319223
Ethylene Glycol	107211	Toluene	108883
Formaldehyde	50000	Hexane	110543
Methanol	67561	Methyl Carbitol	111773
Phenol	108952		

Note: *Cresol may include o-cresol (CAS 95-48-7), m-cresol (CAS 108-39-4), or p-cresol (CAS 06-446) or a combination thereof.

4.1.9 Emissions of criteria pollutants from the facility shall not exceed the following:

	VOC		PM ₁₀		CO		SO ₂		NO _x	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Line 1-C1 (1S)	14.83	80.90	0	0	0	0	0	0	0	0
Line 2-C2 (2S)	14.83		0	0	0	0	0	0	0	0
Line 3-C3 (3S)	6.10		0	0	0	0	0	0	0	0
Line 4-C4 (4S)	3.05		0	0	0	0	0	0	0	0
Cleaning	279.53	58.20	0	0	0	0	0	0	0	0
Thermal Oxidizer 1C	0.08	0.36	0.11	0.50	1.26	5.52	0.01	0.04	1.50	6.57
Thermal Oxidizer 2C	0.03 .04	0.14 .19	0.05 .06	0.20 .27	0.50 .67	2.21 2.94	0.01	0.02 .021	0.30 .40	1.31 1.75
Thermal Oxidizer 3C	0.03	0.14	0.05	0.20	0.50	2.21	0.01	0.02	0.30	1.31
Printer	1.03	2.58	0	0	0	0	0	0	0	0
Tanks	NA	.34	0	0	0	0	0	0	0	0

4.1.10 Emissions of Hazardous Air Pollutants (HAPs) from the facility shall not exceed 10 tons per year of any individual HAP nor 25 tons per year of all combined HAPs

4.1.11 The metal can sheet coating lines shall be vented to thermal oxidizers (lines 1-C1 and 2-C2 to a common TO and lines 3-C3 and 4-C4 to two separate TO's) at all times during which the coating lines are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOC.

4.1.12 The maximum heat input rates and maximum natural gas consumption rates for pollution control devices 1C, 2C, and 3C shall not exceed the limits given below:

Can Coating Line	Pollution Control Device				
	Thermal Oxidizer ID #	Maximum Heat Input		Maximum Natural Gas Consumed	
		(MM Btu/hr)	(MM Btu/yr)	(ft ³ /hr)	(MM ft ³ /yr)
Lines 1-C1 & 2-C2 (ID#s 1S & 2S)	1C	15	131,400	15000	131.4
Line 3-C3 (ID# 17S)	2C	6 9	52,560 78,840	6,000 8,000	52.56 70.08
Line 4-C4 (ID# 18S)	3C	6	52,560	6,000	52.56

- 4.1.13 The thermal oxidizers 2C and 3C shall be operated at the following minimum combustion chamber temperatures during all times the coating line associated with the control device is in operation.

Can Coating Line	Pollution Control Device	
	Thermal Oxidizer ID #	Minimum Combustion Chamber Operating Temperature
Line 3-C3 (ID# 17S)	2C	1350 F
Line 4-C4 (ID# 18S)	3C	1275F ⁽¹⁾

(1) The thermal oxidizer may be operated at a DAQ approved lower temperature while awaiting a permit update to formally lower the temperature. DAQ approval is granted to the permittee to lower the temperature once approved testing has shown that the control device still maintains its required destruction efficiency at the new lower temperature. All testing must be preceded by an approved test protocol and followed by the submittal to DAQ of a test report.

- 4.1.14 During all times coating Line 1-C1 and/or coating Line 2-C2 are in operation, thermal oxidizer 1C shall be operated at the minimum temperature established during the most recent performance test which showed compliance with the requirements of conditions 4.1.6 and 4.1.9 of this permit.
- 4.1.15 The can end making lines originally permitted in R13-1042R (issued January 26, 1989) are authorized only to be installed and operated using water based compounds with zero VOC and HAP content.
- 4.1.16 **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
 [45CSR§13-5.11.]

4.2. Testing Requirements

- 4.2.1. The owner or operator of the affected facility shall construct the VOC emission reductions systems so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures of 40 CFR 60, Appendix A.
- 4.2.2 Within 180 days of the issuance of R13-2410B (October 5, 2006) and at least once every 5 years thereafter the permittee shall perform or have performed USEPA approved tests to determine compliance with the emission limitations and emissions control requirements set forth in conditions 4.1.6 and 4.1.9. VOC capture and destruction efficiency testing was last conducted by Ardagh on February 26 through February 28, 2014.

4.3. Monitoring and Recordkeeping Requirements

- 4.3.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- The date, place as defined in this permit and time of sampling or measurements;
 - The date(s) analyses were performed;

- c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.3.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.3.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
 - f. Steps taken to correct the malfunction.
 - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.3.4. The permittee shall maintain records of the amount and type of coatings, cleaners, pastes and thinners used and VOC and HAP emissions for the coating lines. VOC and HAP emissions shall be calculated using the minimum required control and capture efficiencies as outlined in this permit. Said records shall be maintained on a monthly and 12 month rolling total basis.
- 4.3.5. The permittee shall install, calibrate, maintain, and continuously operate a device(s) to measure and record each of the pollution control devices' combustion chamber temperatures. All temperature records shall be retained on-site for a period of at least five (5) years and shall be made available to the Secretary or his duly authorized representative upon request. The device for 2C shall have an accuracy of ± 2.5 C (± 4.5 F) or ± 0.75 percent of the temperature being measured expressed in degree Celsius. The devices for 1C and 3C shall be certified by the manufacturer to be accurate within plus or minus 1% in degrees Fahrenheit.
- 4.3.6. The permittee shall maintain records of the amount of natural gas burned in the thermal oxidizers. Said records shall be maintained on a monthly and 12 month rolling total basis.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name and Title _____ Title _____
(please print or type) Name

Telephone No. _____ Fax No. _____

-
- ¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.

Appendix C
Red Line Copy of Title V Permit

West Virginia Department of Environmental
Protection.
Division of Air Quality

Jim Justice
Governor

Austin Caperton
Cabinet Secretary

Permit to Operate



Pursuant to
Title V
of the Clean Air Act

Issued
to:

Ardagh Metal Packaging USA Inc.
Weirton Plant, Weirton, WV
R30 00900012 2017

A handwritten signature in blue ink, appearing to read "William F. Durham", written over a horizontal line.

William F. Durham

Director

Expiration: ~~April 1~~ ^{April 1} 2022 • effective May 2017
Renewal Application due: October 1 2021

Permit Number: **R30-00900012-2017**
Permittee: **Ardagh Metal Packaging USA Inc.**
Facility Name: **Weirton Plant**
Permittee Mailing Address: **3030 Birch Drive, Weirton, WV 26062**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 -Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Weirton, Brooke County, West Virginia
Facility Mailing Address:	3030 Birch Drive, Weirton, WV 26062
Telephone Number:	(304) 797-0518
Type of Business Entity:	Corporation
Facility Description:	The Weirton Plant has four (4) coating lines with three thermal oxidation systems with heat recovery. The operating lines (Line Nos. 1 through 4) include the coating operation, drying operation, and the emission control. The equipment is fed uncoated sheets of metal, applies the coating, dries the coating, and restacks the sheets. The only difference with the lines is that Line No. 4 operates in line with the existing Litho Coating Line. The Litho Coating Line is a printer, which prints on the sheet metal prior to the coating being applied in the coating portion of the operation. The facility receives rolls of sheet metal, cuts the sheets, prints and coats the sheets, dries the coatings and then restacks the sheets. The coated sheets are the final product. The site also makes can ends from the sheet metal.
SIC Codes:	3411
UTM Coordinates:	531.834 km Easting • 4470.8233 km Northing • Zone 17

Permit Writer: Robert Mullins

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Table of Contents

1.0	Emission Units and Active R13, R14, and R19 Permits.....	3
2.0	General Conditions.....	4
3.0	Facility-Wide Requirements.....	13
4.0	Coating Operations [emission point ID(s): 4E, 5E, 6E, 7E, 23E, 24E, 28E, 29E, 31E, 8E, 9E, 30E, 31E, and 32E]	19
5.0	Thermal Oxidizers [emission point ID(s): 4E, 5E, 6E, 7E, 23E, 24E, 28E and 29E]	23

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
IS	4E, SE, 6E, 7E	Wagner Coater Oven Line #1	1979	7,300 sheetslhr	1C
2S	4E, SE, 6E, 7E	FECO Coater Oven Line #2	1988	7,300 sheetslhr	1C
17S	23E, 24E	Wagner Coater Oven Line #3	1997	7,500 sheetslhr	2C
18S	28E, 29E	LTG Coater Oven Line #4	2001	7,500 sheetslhr	3C
ISS	8E	Bulk Storage Tank #1	1998	10,000 gallons	NA
16S	9E	Bulk Storage Tank #2	1998	10,000 gallons	NA
30S	30E	Bulk Storage Tank #3	2004	1,500 gallons	NA
31S	31E	Litho Line	1980	5,100 sheetslhr	NA
32S	32E	Cleaning	NA	NA	NA

Control Device ID	Control Device Description	Year Installed	Design Capacity
1C	Thermal Oxidizer No.I (Incinerator)	1979	15 MMBtulhr
2C	Thermal Oxidizer No.2 (LTG Technologies Maxon Incinerator #8 TANN Corp Recuperative Thermal Oxidizer TO855)	1997 2018	6.0 9 MMBtulhr
3C	Thermal Oxidizer No.3	2001	6.0 MMBtulhr

1.2 Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2410D	July 27, 2015

2.0 General Conditions

2.1 Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2 Acronyms

CAAA	Clean Air Act Amendments	NSPS	New Source Performance
CBI	Confidential Business Information		Standards Particulate
CEM	Continuous Emission Monitor	PM	Matter Particulate Matter
CES	Certified Emission Statement	PM ₁₀	less than
C.F.R. or CFR	Code of Federal Regulations		10ft. in diameter
CO	Carbon Monoxide	pph	Pounds per Hour
C.S.R. or CSR	Codes of State Rules	ppm	Parts per Million
DAQ	Division of Air Quality	PSD	Prevention of Significant
DEP	Department of Environmental		Deterioration
	Protection	psi	Pounds per Square Inch
FOIA	Freedom of Information Act	SIC	Standard Industrial
HAP	Hazardous Air Pollutant		Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO ₂	Sulfur Dioxide
lbs/hr or lb/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
m	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control	TSP	Total Suspended Particulate
	Technology	USEPA	United States
mm	Million		Environmental Protection
mmBtu/hr	Million British Thermal Units per		Agency
	Hour	UTM	Universal Transverse
mmft ³ /hr or	Million Cubic Feet Burned per		Mercator
mmcf/hr	Hour	VEE	Visual Emissions
NA or N/A	Not Applicable		Evaluation
NAAQS	National Ambient Air Quality	VOC	Volatile Organic
	Standards		Compounds
NESHAPS	National Emissions Standards for		
	Hazardous Air Pollutants		
NO _x	Nitrogen Oxides		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2 and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
- a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days' notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b) (10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
 - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
 - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
 - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
 - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.
[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.
[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[45CSR§30-5.7.a.]
- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]
- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to

the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-Enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

[45CSR§30-5.3.e.3.B. and 45CSR38)

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

[45CSR§30-5.1.e.)

2.24. Property Rights

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

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.)

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U.S. EPA.
[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. Open burning. The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. Open burning exemptions. The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. Asbestos. The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. Standby plan for reducing emissions. When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2)
- 3.1.6. Emission inventory. The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code§ 22-5-4(a)(14)]
- 3.1.7. Ozone-depleting substances. For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R 82, Subpart F)

- 3.1.8. Risk Management Plan. Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

[40 C.F.R 68]

- 3.1.9. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2410 and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.

[45CSR13, R13-2410, 2.5.1.]

3.2. Monitoring Requirements

- 3.2.1. None.

3.3. Testing Requirements

- 3.3.1. Stack testing. As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, **if** applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the

Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language.
 2. The result of the test for each permit or rule condition.
 3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code §§ 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-2410, 4.3.1]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
(45CSR§30-5.1.c. State-Enforceable only.)

3.5. Reporting Requirements

- 3.5.1. Responsible official. Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§§30-4.4. and 5.1.c.3.D.]
- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3 pursuant to the limitations and procedures of W.Va. Code§ 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]
- 3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

US EPA:

Associate Director
Office of Air Enforcement and Compliance
Assistance (3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

DAQ Compliance and Enforcement¹:
DEPAirQualityReports@wv.gov

¹For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. Certified emissions statement. The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]
- 3.5.5. Compliance certification. The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

DAQ:
DEPAirQualityReports@wv.gov

US EPA:
R3_APD_Permits@epa.gov

[45CSR§30-5.3.e.]

- 3.5.6. Semi-annual monitoring reports. The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following addresses:

DAQ:
DEPAirQualityReports@wv.gov

US EPA:
R3_APD_Permits@epa.gov

[45CSR§30-5.1.c.3.A.]

- 3.5.7. Emergencies. For reporting emergency situations, refer to Section 2.17 of this permit.

- 3.5.8. Deviations.

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
 3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
 4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any

corrective actions or preventive measures taken in accordance with any rules of the Secretary. [45CSR§30-5.1.c.3.B.1]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

- 3.6.1. None.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- a. **40 C.F.R. Part 60 Subpart TT** - Standards of Performance for Metal Coil Surface Coating defines metal coil surface coating operation as the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter or more that is packaged in a roll or coil. This facility cuts the metal coils prior to coating, and as such, is not subject to 40 C.F.R. Part 60 Subpart TT.
 - b. **40 C.F.R. Part 63 Subpart KKKK** - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans. The Ardagh Metal Packaging USA Inc. Weirton Plant reduced their HAP emission limitations (per permit RB-2410) by modifying their use of coatings, cleaners, pastes and thinners to become a synthetic minor source under 40 C.F.R. Part 63 Subpart KKKK.

4.0 Coating Operations [emission point ID(s): 4E, 5E, 6E, 7E, 23E, 24E, 28E, 29E, 8E, 9E, 30E, 31E, and 32E]

4.1. Limitations and Standards

4.1.1. The following maximum annual coating and solvent throughputs and volatile organic compound (VOC) emission rates for the following bulk storage tanks shall not be exceeded:

Bulk Storage Tank ID	Emission Point ID Number	Product in Storage	Maximum Annual Limits	
			Coating Throughput (gallons/year)	VOC Emissions (pounds/year)
15S	8E	PPG4348807 Clear Enamel	200,000	342
16S	9E	96X069A	200,000	342
30S	30E	Glycol Ether (2-n-Butoxy-1-ethanol)	154,000	3.2

Note: The above table is a snapshot of coating storage at permit approval time. The permittee is allowed to change coating storage as long as the requirements given in sections 4.1.8, 4.1.9, and 4.1.I 0 of this permit are met.

[45CSR13, R13-2410, 4.1.1.]

4.1.2. The number of metal sheets coated via Wagner Coater Oven Line #I (ID# IS) shall not exceed 7,300/hr. [45CSR13, R13-2410, 4.1.2.]

4.1.3. The number of metal sheets coated via FECO Coater Oven Line #2 (ID# 2S) shall not exceed 7,300/hr. [45CSR13, R13-2410, 4.1.3.]

4.1.4. The number of metal sheets coated via Wagner Coater Oven Line #3 (Spot Coater C-3 Continuous Drying Oven Type DBL (150' x 6.5' x IO') (ID# 17S)) shall not exceed 7,500/hr. [45CSR13, R13-2410, 4.1.4.]

4.1.5. The number of metal sheets coated via LTG Coater Oven Line #4 (ID# ISS) shall not exceed 7,500/hr. [45CSR13, R13-2410, 4.1.5.]

4.1.6. The metal can sheet coating lines and associated control devices shall be installed, maintained, and operated so as to achieve the following minimum VOC capture efficiencies:

Can Coating Line	Minimum VOC Capture Efficiency	Minimum VOC Control Efficiency
IS (Line 1)	100%	95%
2S (Line 2)	100%	95%
17S (Line3)	100%	98%
18S (Line 4)	100%	99%

[45CSR13, R13-2410, 4.1.6.]

4.1.7. The following coatings and solvents have been permitted for use on metal can sheet Wagner Coater Oven Line #1, FECO Coater Oven Line #2, Wagner Coater Oven Line #3, LTG Coater Oven Line #4 (Coating Lines CI - C4) (ID# 1S, 2S, 17S, &ISS), and at the maximum usage rates given below:

Description	Maximum Usage Rate (gallons/vr)	Maximum VOC Usage Rate (lb/vr)
Coatings		
9200-014	1,600	8,640
13S07WF	50,000	180,000
ICI 642E118	200,000	720,000
9851-019	185,000	943,500
9434039	7,500	64,425
9851-577	4,800	24,480
8406026	55	292
8744-902	110	583
20S78AA	2,000	17,200
20S82AA	600	3,720
20S67WA	50,000	421,500
6256054	10,000	53,000
PPGG23	300	1,530
657 HE 1293	7,500	59,925
657HE 13501	8,300	39,840
5698014	39,800	131,340
9009-920	38,900	202,280
9851-579	5,000	26,000
646C140	3,000	16,416
9851589	2,000	10,608
92X111H	10,000	88,000
96X069A	200,000	695,942
26S96EJ	300	3,540
2019-03	1,140	9,610
4001S13V	12,000	113,640
4348807	113,330	917,973
4348312	3,207	25,978
816610	2,500	22,000
816361	1,800	14,868
51-017	3,000	25,500
Pastes, Lubricants, and Thinners		
4623105	1,100	5,610
1949101	7,000	23,100
6661011	210	1,365
7789001	300	1,080
Hi Sol10	110	803
Glycol Ether EB	46,000	346,395
Mineral Spirits 66/3	10,000	64,974
Aromatic 100	208	1,508
Isophorone	52	355
Arcosolve PM Acetate	6,000	47,981
Belt Cleaners		
EastmanMPK	330	371
Cleanup Solvents		
Reformulated 4212-1	16,000	112,160
IPA Anhydrous	5,000	32,900
UV Wash5700	2,000	11,400
General Wash	2,000	13,800
Total		5,506,132

Note: The above table is a snapshot of coating usage at permit approval time. The permittee is allowed to change coatings and coating usage rates as long as the requirements given in sections 4.1.8., 4.1.9, and 4.1.10 of this permit are met.

[45CSR13, R13-2410, 4.1.7.]

4.1.8. Use of any surface coating, paste, lubricant, thinner, solvent or cleaner containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed below shall be in accordance with the following:

- a. The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
- b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.

HAP	CAS Number	HAP	CAS Number
Cumene	98828	Xylene	1330207
Ethyl Benzene	100414	Isophorone	78591
Methyl Isobutyl Ketone	108101	Naphthalene	91203
Glycol Ethers	NA	*Cresol	1319223
Ethylene Glycol	107211	Toluene	108883
Formaldehyde	50000	Hexane	110543
Methanol	67561	Methyl Carbitol	111773
Phenol	108952		

Note: *Cresol may include o-cresol (CAS 95-48-7), m-cresol (108-39-4), or p-cresol (106-445) or a combination thereof.

[45CSR13, R13-2410, 4.1.8.]

4.1.9. Emissions of criteria pollutants from the facility shall not exceed the following:

Emission Unit ID	VOC		PM10		CO		SO ₂		NO _x	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Line 1 (IS)	14.83	80.90	0	0	0	0	0	0	0	0
Line 2 (2S)	14.83		0	0	0	0	0	0	0	0
Line 3 (17S)	6.10		0	0	0	0	0	0	0	0
Line 4 (18S)	3.05		0	0	0	0	0	0	0	0
Cleaning (32S)	279.53	58.20	0	0	0	0	0	0	0	0
Printer (31S)	1.03	2.58	0	0	0	0	0	0	0	0
Tanks (15S, 16S, 30S)	NA	0.34	0	0	0	0	0	0	0	0

[45CSR13, R13-2410, 4.1.9.]

4.1.10. Emissions of Hazardous Air Pollutants (HAPs) from the facility shall not exceed 10 tons per year of any individual HAP nor 25 tons per year of all combined HAPs.

[45CSR13, R13-2410, 4.1.10.]

4.1.11. The metal can sheet coating lines shall be vented to thermal oxidizers (lines 1 and 2 to a common TO and lines 3 and 4 to two separate TO's) at all times during which the coating lines are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOC.

[45CSR13, R13-2410, 4.1.11.]

- 4.1.12. The can end making lines originally permitted in R13-1042R (issued January 26, 1989) are authorized only to be installed and operated using water based compounds with zero VOC and HAP content.
[45CSR13, R13-2410, 4.1.15.]

4.2. Monitoring Requirements

- 4.2.1. None.

4.3. Testing Requirements

- 4.3.1. The owner or operator of the affected facility shall construct the VOC emission reduction systems so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures of 40 C.F.R. Part 60 Appendix A.
[45CSR13, R13-2410, 4.2.1.]
- 4.3.2. At least once every 5 years thereafter the permittee shall perform or have performed USEPA approved tests to determine compliance with the emission limitations and emissions control requirements set forth in Sections 4.1.6, 4.1.9, and 5.1.1.

Note: Ardagh conducted a test on February 26 through February 28, 2014 to determine the VOC capture and destruction efficiency.

[45CSR13, R13-2410, 4.2.2.]

4.4. Recordkeeping Requirements

- 4.4.1. The permittee shall maintain records of the amount and type of coatings, cleaners, pastes and thinners used and VOC and HAP emissions for the coating lines. VOC and HAP emissions shall be calculated using the minimum required control and capture efficiencies as outlined in this permit. Said records shall be maintained on a monthly and 12 month rolling total basis.
[45CSR13, R13-2410, 4.3.4.]
- 4.4.2. The permittee shall maintain hourly records of the metal sheets that are coated on each coating line as required by Sections 4.1.2, 4.1.3, 4.1.4, and 4.1.5.
[45CSR§30-5.1.c.]

4.5. Reporting Requirements

- 4.5.1. None.

4.6. Compliance Plan

- 4.6.1. None.

5.0 Thermal Oxidizers [emission point ID(s): 4E, 5E, 6E, 7E, 23E, 24E, 28E and 29E]

5.1. Limitations and Standards

5.1.1. Emissions of criteria pollutants from the facility thermal oxidizers shall not exceed the following:

Emission Point ID	VOC		PM10		CO		SO2		NOx	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
4E, 5E, 6E, 7E	0.08	0.36	0.11	0.50	1.26	5.52	0.01	0.04	1.50	6.57
23E, 24E	0.03 0.04	0.14 0.19	0.05 0.06	0.20 0.27	0.50 0.67	2.21 2.94	0.01	0.02 0.021	0.30 0.40	1.31 1.75
28E, 29E	0.03	0.14	0.05	0.20	0.50	2.21	0.01	0.02	0.30	1.31

Compliance with 45CSR§6-4.1 (5.1.5.) will be shown by the more stringent requirements of Section 5.1.1.

[45CSR13, R13-2410, 4.1.9.]

5.1.2. The maximum heat input rates and maximum natural gas consumption rates for pollution control devices 1C, 2C and 3C shall not exceed the limits given below:

Can Coating Line	Pollution Control Device				
	ID#	Maximum Heat Input		Maximum Natural Gas Consumed	
		MMBtu/hr	MMBtu/year	Ft ³ /hr	MMft ³ /year
Lines 1&2 (ID#s 1S & 2S)	1C	15	131,400	15,000	131.4
Line3 (ID# 17S)	2C	6.9	52,560 78,840	6,000 8,000	52.56 70.08
Line4 (ID# ISS)	3C	6	52,560	6,000	52.56

[45CSR13, R13-2410, 4.1.12]

5.1.3. The thermal oxidizers 2C and 3C shall be operated at the following minimum combustion chamber temperatures during all times the coating line associated with the control device is in operation.

Can Coating Line	Pollution Control Device	
	ID#	Minimum Combustion Chamber Operating Temperature
Line 3 (ID# 17S)	2C	1350 °F
Line 4 (ID# 18S)	3C	1275 °F

(u) The thermal oxidizer may be operated at a DAQ-approved lower temperature while awaiting a permit update to formally lower the temperature. DAQ approval is granted to the permittee to lower the temperature once approved testing has shown that the control device still maintains its required destruction efficiency at the new lower temperature. All testing must be preceded by an approved test protocol and followed by the submittal to DAQ of a test report.

[45CSR13, R13-2410, 4.1.13.]

5.1.4. During all times Wagner Coater Oven Line #1 (ID# IS) and/or FECO Coater Oven Line #2 (ID# 2S) are in operation, thermal oxidizer 1C shall be operated at the minimum temperature established during the most recent performance test which showed compliance with Sections 4.1.6, 4.1.9 and 5.1.1.

[45CSR13, R13-2410, 4.1.14.]

- 5.1.5. No person shall cause, suffer, allow or permit particulate matter to be discharged from Thermal Oxidizer No. 1, 2, and 3 into the open air in excess of 1.41 lb/hr, 0.72 lb/hr, and 0.58 lb/hr, respectively. Compliance with 45CSR§6-4.1 will be shown by the more stringent requirements of Section 5.1.1.
[45CSR§6-4.1.]
- 5.1.6. No person shall cause, suffer, allow or permit emission of smoke into the atmosphere from any incinerator which is twenty (20%) percent opacity or greater.
[45CSR§6-4.3.]
- 5.1.7. The provisions of Section 5.1.6 [45CSR§6-4.3] shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six (6) minutes in any sixty (60)-minute period for stoking operations.
[45CSR§6-4.4.]
- 5.1.8. No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.
[45CSR§6-4.5.]
- 5.1.9. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
[45CSR§6-4.6.]
- 5.1.10. Due to unavoidable malfunction of equipment, emissions exceeding those provided for in 45CSR6 may be permitted by the Director for periods not to exceed five (5) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§6-8.2.]
- 5.1.11. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.1 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR13, R13-2410, 4.1.16.]

5.2. Monitoring Requirements

- 5.2.1. For the purpose of determining compliance with the opacity limits of 45CSR6, visible emission checks of the thermal oxidizer (1C, 2C, 3C) shall be conducted. The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. Part 60 Appendix A, Method 22 or from the lecture portion of the 40 C.F.R. Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted on a semi-annual basis. If visible emissions are observed, the permittee shall conduct visible emission checks at least once monthly for three months. If no visible emissions are observed after three months, the permittee may conduct visible emissions checks again on a

semi-annual basis. These checks shall be performed at each thermal oxidizer for a sufficient time interval, but no less than one **(1)** minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of facility operation and appropriate weather conditions.

If visible emissions are observed for three (3) consecutive months, the permittee shall conduct an opacity evaluation in accordance with Method 9 of 40 C.F.R. 60 Appendix A, as soon as practicable, but within 72 hours unless the visible emissions are corrected beforehand and the units are operated at normal operating conditions.

[45CSR§30-5.1.c.]

- 5.2.2. The permittee shall install, calibrate, maintain, and continuously operate a device(s) to measure and record each of the pollution control devices' combustion chamber temperatures. All temperature records shall be retained on-site for a period of at least five (5) years and shall be made available to the Secretary or his duly authorized representative upon request. The device for 2C shall have an accuracy of $\pm 2.5\text{ }^{\circ}\text{C}$ ($\pm 4.5\text{ }^{\circ}\text{F}$) or ± 0.75 percent of the temperature being measured expressed in degree Celsius. The devices for 1C and 3C shall be certified by the manufacturer to be accurate within plus or minus 1% in degrees Fahrenheit.

[45CSR13, R13-2410, 4.3.5.) (1C, 2C and 3C)

- 5.2.3. The permittee shall monitor the Thermal Oxidizer No. 1C combustion temperature throughout the day while Wagner Coater Oven Line #1 (1S) and FECO Coater Oven Line #2 (2S) are in operation. The Thermal Oxidizer No. 1C minimum temperature is to be established during the most recent performance test (see Section 5.1.4.). The temperature monitoring device on the Thermal Oxidizer No. 1C shall have an accuracy within plus or minus 1% in degrees Fahrenheit (see Section 5.2.2.). The temperature gauge shall be calibrated annually according to manufacturer's specifications and recommendations. When VOC and HAPs are not being processed through the thermal oxidizer, the temperature can be lower than the determined minimum temperature. The data collection frequency shall be at least one (1) data point read every sixty (60) seconds by a continuous electronic recorder. Fifteen (15) consecutive data points shall be averaged to generate one (1) record of datum every 15-minute cycle, equivalent to four (4) data points equally spaced over one (1) hour. The permittee must determine the average of all recorded readings for each successive 3-hour period for the emission control device operation. An excursion shall be defined as when the average combustion temperature in each 3-hour block period is less than the minimum combustion temperature limit established in condition 5.1.4.

[45CSR§30-5.1.c; 40 C.F.R. § 64.6 (c))

- 5.2.4. The permittee shall monitor the Thermal Oxidizer No. 2C combustion temperature throughout the day while Wagner Coater Oven Line #3 (17S) is in operation. When VOC and HAPs are not being processed through the thermal oxidizer, the temperature can be lower than the determined minimum temperature of 1350 °F. The temperature monitoring device on the Thermal Oxidizer No. 2C shall have an accuracy of $\pm 2.5\text{ }^{\circ}\text{C}$ ($\pm 4.5\text{ }^{\circ}\text{F}$) or ± 0.75 percent of the temperature being measured expressed in degree Celsius (see Section 5.2.2.). The temperature gauge shall be calibrated annually according to manufacturer's specifications and recommendations. The data collection frequency shall be at least one **(1)** data point read every sixty (60) seconds by a continuous electronic recorder. Fifteen (15) consecutive data points shall be averaged to generate one (1) record of datum every 15-minute cycle, equivalent to four (4) data points equally spaced over one **(1)** hour. The permittee must determine the average of all recorded readings for each successive 3-hour period for the emission control device operation. An excursion shall be defined as when the average combustion temperature in each 3-hour block period is less than the minimum combustion temperature limit of 1350 °F.

[45CSR§30-5.1.c; 40 C.F.R. § 64.6 (c))

- 5.2.5. The permittee shall monitor the Thermal Oxidizer No. 3C combustion temperature throughout the day while LTG Coater Oven Line #4 (18S) is in operation. When VOC and HAPs are not being processed through the thermal oxidizer, the temperature can be lower than the determined minimum temperature of 1275 °F. The temperature monitoring device on the Thermal Oxidizer No. 3C shall have an accuracy within plus or minus 1% in degrees Fahrenheit (see Section 5.2.2.). The temperature gauge shall be calibrated annually according to manufacturer's specifications and recommendations. The data collection frequency shall be at least one (1) data point read every sixty (60) seconds by a continuous electronic recorder. Fifteen (15) consecutive data points shall be averaged to generate one (1) record of datum every 15-minute cycle, equivalent to four (4) data points equally spaced over one (1) hour. The permittee must determine the average of all recorded readings for each successive 3-hour period for the emission control device operation. An excursion shall be defined as when the average combustion temperature in each 3-hour block period is less than the minimum combustion temperature limit of 1275 °F.
[45CSR§30-5.1.c; 40 C.F.R. § 64.6 (c)]
- 5.2.6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring specified in Sections 5.2.3, 5.2.4, and 5.2.5, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[45CSR§30-5.1.c; 40 C.F.R. § 64.7 (b)]
- 5.2.7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[45CSR§30-5.1.c; 40 C.F.R. § 64.7 (c)]
- 5.2.8. Response to excursions or exceedances.
- a. Upon detecting an excursion or exceedance, the owner or operation shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited

to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[45CSR§30-5.1.c; 40 C.F.R. § 64.7 (d)]

- 5.2.9. **Documentation of need for improved monitoring.** After approval of monitoring under 40 C.F.R. 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[45CSR§30-5.1.c; 40 C.F.R. § 64.7 (e)]

5.2.10. **Quality Improvement Plan (QIP)**

- a. Based on the results of a determination made under Section 5.2.8.b, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 C.F.R. §§ 64.8 (b) through (e). Refer to Section 5.5.2.b.iii for the reporting required when a QIP is implemented.
- b. If during a calendar quarter, an excursion (as defined under Sections 5.2.3, 5.2.4, and 5.2.5.) occurred on more than five (5) percent of the days that the thermal oxidizer (1C, 2C, or 3C) was operated, the permittee shall develop and implement a QIP. The Director may waive this QIP requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to Section 3.3.I.

[45CSR§30-5.1.c; 40 C.F.R. § 64.8]

5.3. Testing Requirements

- 5.3.1. At such reasonable times as the Director may designate, the operator of any incinerator shall be required to conduct or have conducted stack tests to determine the particulate matter loading, by using 40 C.F.R. Part 60, Appendix A, Method 5 or other equivalent EPA approved method approved by the Director, in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or the Director's authorized representative, may at the Director's option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.

[45CSR§6-7.1.]

- 5.3.2. The Director, or the Director's duly authorized representative, may conduct such other tests as the Director may deem necessary to evaluate air pollution emissions other than those noted above.

[45CSR§6-7.2.]

- 5.3.3. See Sections 4.3.1 and 4.3.2 for additional testing.

5.4. Recordkeeping Requirements

- 5.4.1. The permittee shall maintain records of all monitoring data required by Section 5.2.1, documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6- 10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the evaluation, the record of observation may note "out of service" (O/S) or equivalent
[45CSR§30-5.1.c.]
- 5.4.2. The permittee shall maintain records of the amount of natural gas burned in the thermal oxidizers. Said records shall be maintained on a monthly and 12 month rolling total basis.
[45CSR13, R13-2410, 4.3.6.]
- 5.4.3. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.1, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, R13-2410, 4.3.2.]
- 5.4.4. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.1, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.
- For each such case associated with an equipment malfunction, the additional information shall also be recorded:
- e. The cause of the malfunction.
 - f. Steps taken to correct the malfunction.
 - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- [45CSR13, R13-2410, 4.3.3.]
- 5.4.5. The permittee shall maintain the following records in the manner specified under Condition 3.4.2:

- a. Records of the thermal oxidizers' (1C, 2C, and 3C) combustion temperatures shall be continuously recorded and maintained. The temperature monitoring data shall be recorded using either the process distributed control system, operating log, or other equivalent method approved by the Director.
- b. A record of the number, duration and cause(s) of all excursions or exceedances, and the corrective actions taken shall be maintained for the thermal oxidizers (1C, 2C, and 3C).
- c. A record of the number, duration, and cause for the downtime of the thermal oxidizers' (1C, 2C, and 3C) temperature gauge shall be kept. This excludes downtime for calibration checks. This document shall also include the measures taken to correct the downtime.
- d. The permittee shall maintain maintenance records on the thermal oxidizers (1C, 2C, and 3C).

[45CSR§30-5.1.c; 40 C.F.R. § 64.9 (b)]

- 5.4.6. The thermal oxidizers' (1C, 2C, and 3C) records of all periodic testing/checks, calibration, and maintenance per manufacturer's specifications and recommendations shall be maintained.

All records shall be maintained in the manner specified in Condition 3.4.2.

[45CSR§30-5.1.c; 40 C.F.R. § 64.9 (b)]

- 5.4.7. **General recordkeeping requirements for 40 C.F.R. Part 64 (CAM).** The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. § 64.8 (Condition 5.2.10) and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

[45CSR§30-5.1.c; 40 C.F.R. § 64.9 (b)]

5.5. Reporting Requirements

- 5.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observations using 40 C.F.R. Part 60 Appendix A, Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

[45CSR§30-5.1.c.]

- 5.5.2. **General reporting requirements for 40 C.F.R. Part 64 (CAM)**

- a. On and after the date specified in 40 C.F.R. § 64.7 (a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the DAQ in accordance with Section 3.5.6.
- b. A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under Section 3.5.8 and the following information, as applicable:

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

[45CSR§30-5.1.c.; 40 C.F.R. § 64.9 (a)]

5.6. Compliance Plan

- 5.6.1. None.

5.7 CAM Plan Summary of Requirements for Thermal Oxidizer No. 1 (1C)

	Indicator No. 1
I. Indicator	Combustion chamber temperature
Measurement Approach	The combustion chamber temperature is monitored with a thermocouple.
II. Indicator Range	An excursion is defined as 3-hour block average temperature readings less than the determined minimum temperature when VOC and HAPs are being processed in the oxidizer. (Sections 5.1.4 and 5.2.3.) Excursion triggers an inspection and evaluation, corrective action, recordkeeping, and reporting requirements (permit condition 5.2.8).
III. Performance Criteria	
A. Data Representativeness	Combustion chamber temperature measured using a thermocouple with an accuracy of plus or minus 1% in degrees Fahrenheit. (Section 5.2.2.)
B. Verification of Operational Status	Not applicable.
C. QA/QC Practices and Criteria	The temperature gauge shall be calibrated annually. (Section 5.2.3.)
D. Monitoring Frequency	Measured continuously while the Coating Lines #1 and #2 are operating. (Section 5.2.3.)
Data Collection Procedure	Data points collected at least every 60 Seconds. (section 5.2.3)
Averaging Period	15 consecutive points averaged for 15-minute interval. One average number is recorded every 15 minutes and four numbers are recorded per hour at evenly spaced intervals. These four readings are reduced to a 3-hour block average.

5.8 CAM Plan Summary of Requirements for Thermal Oxidizer No. 2 (2C)

Indicator No. 1	
I. Indicator	Combustion chamber temperature
Measurement Approach	The combustion chamber temperature is monitored with a thermocouple.
II. Indicator Range	An excursion is defined as 3- hour block average temperature readings less than 1350 °F when VOC and HAPs are being processed in the oxidizer. (Sections 5.1.3 and 5.2.4.) Excursion triggers an inspection and evaluation, corrective action, recordkeeping, and reporting requirements (permit condition 5.2.8).
III. Performance Criteria	
A. Data Representativeness	Combustion chamber temperature measured using a thermocouple with an accuracy of ± 2.5 °C (± 4.5 °F) or ± 0.75 percent of the temperature being measured expressed in degree Celsius. (Section 5.2.2.)
B. Verification of Operational Status	Not applicable.
C. QA/QC Practices and Criteria	The temperature gauge shall be calibrated annually. (Section 5.2.4.)
D. Monitoring Frequency	Measured continuously while the Coating Line No. 3 is operating. (Section 5.2.4.) Data points collected at least every 60 Seconds. (section 5.4.5)
Data Collection Procedure	Data points collected at least every 60 Seconds. (section 5.2.3)
Averaging Period	15 consecutive points averaged for 15-minute interval. One average number is recorded every 15 minutes and four numbers are recorded per hour at evenly spaced intervals. These four readings are reduced to a 3-hour block average.

5.9 CAM Plan Summary of Requirements for Thermal Oxidizer No. 3 (3C)

Indicator No. 1	
I. Indicator	Combustion chamber temperature
Measurement Approach	The combustion chamber temperature is monitored with a thermocouple.
II. Indicator Range	An excursion is defined as 3- hour block average temperature readings less than 1275°F when VOC and HAPs are being processed in the oxidizer. (Sections 5.1.3 and 5.2.5.) Excursion triggers an inspection and evaluation, corrective action, recordkeeping, and reporting requirements (permit condition 5.2.8).
III. Performance Criteria	
A. Data Representativeness	Combustion chamber temperature measured using a thermocouple with an accuracy of plus or minus 1% in degrees Fahrenheit. (Section 5.2.2.)
B. Verification of Operational Status	Not applicable.
C. QA/QC Practices and Criteria	The temperature gauge shall be calibrated annually. (Section 5.2.5.)
D. Monitoring Frequency	Measured continuously while the Coating Lines #4 is operating. (Section 5.2.5.)
Data Collection Procedure	Data points collected at least every 60 Seconds. (section 5.4.5)
Averaging Period	15 consecutive points averaged for 15-minute interval. One average number is recorded every 15 minutes and four numbers are recorded per hour at evenly spaced intervals. These four reading are reduced to a 3-hour block average.

Appendix D
CD Copies of Application