NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for Crown Cork & Seal USA, Inc. in Montgomery County

Part 70 Operating Permit Renewal No.: T107-40834-00004

The Indiana Department of Environmental Management (IDEM) has received an application from Crown Cork & Seal USA, Inc. located at 400 N. Walnut Street, Crawfordsville, IN 47933 for a renewal of its Part 70 Operating Permit issued on September 19, 2014. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Crown Cork & Seal USA, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Crawfordsville Public Library
205 S. Washington Street
Crawfordsville, IN 47933

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.
Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T107-40834-00004 in all correspondence.

Comments should be sent to:

Deena Levering
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-63 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Deena Levering or (317) 234-5400
Or dial directly: (317) 234-5400
Fax: (317) 232-6749 attn: Deena Levering
E-mail: cleverin@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Deena Levering of my staff at the above address.

[Signature]
Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Crown Cork & Seal USA, Inc.
400 N. Walnut Street
Crawfordsville, Indiana 47933

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-08034-00004
Master Agency Interest ID: 11826

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<th>Issuance Date:</th>
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<tr>
<td>Heath Hartley, Section Chief</td>
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<td>Permits Branch</td>
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<td>Office of Air Quality</td>
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SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary punch press, printing, and sheet coating operation for the purpose of fabricating metal cans, crowns, and other miscellaneous metal container parts.

| Source Address: | 400 N. Walnut Street, Crawfordsville, Indiana 47933 |
| General Source Phone Number: | (765) 362-3200 |
| SIC Code: | 3466 (Crowns and Closures) |
| County Location: | Montgomery |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program |
| | Minor Source, under PSD and Emission Offset Rules |
| | Minor Source, Section 112 of the Clean Air Act |
| | Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) sheet coater booth, identified as Line 5, constructed in 1988, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 5 Oven, with a maximum heat input capacity of 4.0 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth is utilized.

(b) One (1) sheet coater booth, identified as Line 6, constructed in 1988, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 6 Oven, with a maximum heat input capacity of 6.0 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth is utilized.

(c) One (1) sheet coater booth, identified as Line 7, constructed in 2011, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, using a thermal oxidizer, TO2, as control, exhausting to stack I-2. A permanent total enclosure for the sheet coater booth (Line 7) is utilized. The excess heat from the thermal oxidizer is redirected for drying purposes for Line 7.

(d) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO1, consisting of
two (2) burners each with a maximum heat input rating of 4.0 MMBtu per hour and used as control for Lines 3, 5 and 6. Constructed in 1988 and exhausting to stack I-1.

(e) One (1) natural gas-fired thermal oxidizer, identified as TO2, constructed in 2011, equipped with a 3.8 MMBtu per hour burner, with heat being recirculated to the drying oven for Line 7 after burn-off.

(f) One (1) Enclosed MicroClean System, installed in 1988, with a maximum throughput of 50 pounds of grit per hour, using a filtration system as control, and exhausting indoors.

A.3 Specifically Regulated Insignificant Activities

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

(a) Paved and unpaved roads and parking lots with public access.

(b) One (1) Maintenance Parts Washer, with a maximum usage rate of 140 gallons per year, using no controls, and exhausting indoors.

(c) One (1) Litho Parts Washer, with a maximum usage rate of 80 gallons per year, using no controls, and exhausting indoors.

(d) One (1) non-mechanical dip and manual General Wash up, used to clean off-line rollers, with a maximum usage rate of 20,222.5 gallons per year, using no controls, and exhausting indoors.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - applicability).
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
(a) This permit, T107-40834-00004, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.
The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

### B.11 Emergency Provisions [326 IAC 2-7-16]

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<td>(a)</td>
<td>An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.</td>
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<td>(b)</td>
<td>An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:</td>
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<tr>
<td>(1)</td>
<td>An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;</td>
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<tr>
<td>(2)</td>
<td>The permitted facility was at the time being properly operated;</td>
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<tr>
<td>(3)</td>
<td>During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;</td>
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<tr>
<td>(4)</td>
<td>For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;</td>
</tr>
<tr>
<td></td>
<td>Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or</td>
</tr>
<tr>
<td></td>
<td>Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)</td>
</tr>
<tr>
<td></td>
<td>Facsimile Number: 317-233-6865</td>
</tr>
<tr>
<td>(5)</td>
<td>For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:</td>
</tr>
<tr>
<td></td>
<td>Indiana Department of Environmental Management</td>
</tr>
<tr>
<td></td>
<td>Compliance and Enforcement Branch, Office of Air Quality</td>
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<td></td>
<td>100 North Senate Avenue</td>
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<td>MC 61-53 IGCN 1003</td>
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<td></td>
<td>Indianapolis, Indiana 46204-2251</td>
</tr>
<tr>
<td></td>
<td>within two (2) working days of the time when emission limitations were exceeded due to the emergency.</td>
</tr>
<tr>
<td></td>
<td>The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:</td>
</tr>
<tr>
<td>(A)</td>
<td>A description of the emergency;</td>
</tr>
<tr>
<td>(B)</td>
<td>Any steps taken to mitigate the emissions; and</td>
</tr>
<tr>
<td>(C)</td>
<td>Corrective actions taken.</td>
</tr>
</tbody>
</table>
The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]  

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

1. The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
2. The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
4. The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1-1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T107-40834-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,
2. revised under 326 IAC 2-7-10.5, or
3. deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

1. That this permit contains a material mistake.
2. That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
3. That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

1. Submitted at least nine (9) months prior to the date of the expiration of this permit; and

2. If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the
deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-135).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)]
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards  [326 IAC 2-7-5(1)]

C.1  Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2  Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a)  Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b)  Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3  Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4  Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5  Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6  Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a)  Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b)  The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

   (A) Asbestos removal or demolition start date;

   (B) Removal or demolition contractor; or

   (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.
Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee’s control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;
(2) review of operation and maintenance procedures and records; and/or
(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

   (AA) All calibration and maintenance records.
   (BB) All original strip chart recordings for continuous monitoring instrumentation.
   (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

   (AA) The date, place, as defined in this permit, and time of sampling or measurements.
   (BB) The dates analyses were performed.
   (CC) The company or entity that performed the analyses.
   (DD) The analytical techniques or methods used.
   (EE) The results of such analyses.
   (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
Emissions Unit Description:

(a) One (1) sheet coater booth, identified as Line 5, constructed in 1988, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 5 Oven, with a maximum heat input capacity of 4.0 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth is utilized.

(b) One (1) sheet coater booth, identified as Line 6, constructed in 1988, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 6 Oven, with a maximum heat input capacity of 6.0 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth is utilized.

(c) One (1) sheet coater booth, identified as Line 7, constructed in 2011, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, using a thermal oxidizer, TO2, as control, exhausting to stack I-2. A permanent total enclosure for the sheet coater booth (Line 7) is utilized. The excess heat from the thermal oxidizer is redirected for drying purposes for Line 7.

(d) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO1, consisting of two (2) burners each with a maximum heat input rating of 4.0 MMBtu per hour and used as control for Lines 3, 5 and 6. Constructed in 1988 and exhausting to stack I-1.

(e) One (1) natural gas-fired thermal oxidizer, identified as TO2, constructed in 2011, equipped with a 3.8 MMBtu per hour burner, with heat being recirculated to the drying oven for Line 7 after burn-off.

Insignificant Activities:

(b) One (1) Maintenance Parts Washer, with a maximum usage rate of 140 gallons per year, using no controls, and exhausting indoors.

(c) One (1) Litho Parts Washer, with a maximum usage rate of 80 gallons per year, using no controls, and exhausting indoors.

(d) One (1) non-mechanical dip and manual General Wash up, used to clean off-line rollers, with a maximum usage rate of 20,222.5 gallons per year, using no controls, and exhausting indoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
Emission Limitations and Standards  [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The VOC input, including coatings, dilution solvents, and cleaning solvents, to the Lines 5, 6 and 7 and the cleanup solvents shall be limited such that the VOC emissions shall not exceed 245.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Hazardous Air Pollutant (HAP) Minor Limit [40 CFR 63]

In order to assure this source is an area source of HAPs under Section 112 of the Clean Air Act (CAA), the input of any single HAP and total combination of HAPs at the Lines 5, 6, and 7 and the cleanup solvent shall not exceed the following:

(a) The combined single HAP emissions from Lines 5, 6, and 7 and the cleanup solvents shall not exceed 9.0 tons per twelve (12) consecutive month period, combined, with compliance determined at the end of each month.

(b) The combined total HAP emissions from Lines 5, 6, and 7 and the cleanup solvents shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.1.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3 (Can Coating Operations), for Lines 5, 6, and 7, the Permittee shall not allow the discharge into the atmosphere in excess of 2.8 pounds per gallon excluding water, delivered to the coating applicator from two-piece can exterior (basecoat and overvarnish) operations.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.1.5 VOC and HAP Control

In order to assure compliance with Conditions D.1.1, 1.2, and D.1.3, the thermal oxidizers RTO1 and TO2 for VOC control shall be in operation and control emissions from the surface coating lines 5, 6, and 7 facility at all times the respective surface coating lines are in operation.
D.1.6 VOC Emissions

In order to demonstrate compliance with Condition D.1.1, VOC emissions shall be determined not later than thirty (30) days after the end of each month. This shall be based on the total volatile organic compound emitted for the previous month added to the total VOC emitted during the previous 11 months, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.

Monthly VOC emissions can be calculated using the following VOC usage equation:

\[ N = (M_5 \times (1 - (C_5 \times DRTO1))) + (M_7 \times (1 - (C_7 \times DTO2))) + R + L \]

Where:
- \( N \) = VOC emissions in tons per month
- \( M_5 \) = VOC usage in tons per month from Lines 5 and 6 that pass through RTO 1
- \( M_7 \) = VOC usage in tons per month from Line 7 that pass through TO 2
- \( C_5 \) = Capture Efficiency of the total enclosure for Lines 5 and 6 (100%)
- \( C_7 \) = Capture Efficiency of the total enclosure for Line 7 (100%)
- \( DRTO1 \) = Destruction Efficiency of RTO1 (as determined by the latest IDEM approved stack test)
- \( DTO2 \) = Destruction Efficiency of TO2 (as determined by the latest IDEM approved stack test)
- \( R \) = VOC usage of solvents that did not pass through a thermal oxidizer in tons per month
- \( L \) = VOC usage from any coatings that did not pass through a thermal oxidizer in tons per month

D.1.7 HAPs Emissions

(a) In order to demonstrate compliance with Condition D.1.2, single HAP emissions shall be determined not later than 30 days after the end of each month. This shall be based on the total single HAP emitted for the previous month added to the total single HAP emitted during the previous 11 months, so as to arrive at single HAP emissions for the most recent twelve (12) consecutive month period.

Monthly single HAP emissions can be calculated using the following single HAP usage equation:

\[ D = (N_5 \times (1 - (C_5 \times DRTO1))) + (N_7 \times (1 - (C_7 \times DTO2))) + T + L \]

Where:
- \( D \) = Single HAP emissions in a month
- \( N_5 \) = Single HAP usage in tons per month from Lines 5 and 6 that pass through RTO 1
- \( N_7 \) = Single HAP usage in tons per month from Line 7 that passes through TO 2
- \( C_5 \) = Capture Efficiency of the PTE for Lines 5 and 6 (100%)
- \( C_7 \) = Capture Efficiency of the PTE for Line 7 (100%)
- \( DRTO1 \) = Destruction Efficiency of RTO1 (as determined by the latest IDEM approved stack test)
- \( DTO2 \) = Destruction Efficiency of TO2 (as determined by the latest IDEM approved stack test)
- \( T \) = Single HAP usage of solvents that did not pass through a thermal oxidizer in tons per month
- \( L \) = Single HAP usage from any coatings that did not pass through a thermal oxidizer in tons per month

(b) In order to demonstrate compliance with Condition D.1.2, total combined HAPs emissions shall be determined not later than 30 days after the end of each month. This shall be based on the total combined HAP emitted for the previous month added to the total combined HAP emitted during the previous 11 months, so as to arrive at combined HAP
emissions for the most recent twelve (12) consecutive month period.

Monthly combined HAP emissions can be calculated using the following combined HAP usage equation:

\[ J = (P_5 \times (1 - (C_5 \times D_{RTO1}))) + (P_7 \times (1 - (C_7 \times D_{TO2}))) + T + L \]

Where:
- **J** = Combined HAP emissions in tons month
- **P_5** = Total HAP usage in tons per month from Lines 5 and 6 that pass through RTO 1
- **P_7** = Total HAP usage in tons per month from Line 7 that passes through TO2
- **C_5** = Capture Efficiency of the PTE for lines 5 and 6 (100%)
- **C_7** = Capture Efficiency of the PTE for Line 7 (100%)
- **D_{RTO1}** = Destruction Efficiency of RTO1 (as determined by the latest IDEM approved stack test)
- **D_{TO2}** = Destruction Efficiency of TO2 (as determined by the latest IDEM approved stack test)
- **T** = Total HAP usage of solvents that did not pass through a thermal oxidizer in tons per month
- **L** = Total HAP usage from any coatings that did not pass through a thermal oxidizer in tons per month

**D.1.8 Testing Requirements [326 IAC 2-1.1-11]**

In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall perform overall VOC and HAP control efficiency (including capture and destruction efficiency) testing of the thermal oxidizers RTO1 and TO2 utilizing methods as approved by the Commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. HAP testing shall be conducted for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

**D.1.9 VOC and HAPs [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC and HAPs usage and content limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.10 Volatile Organic Compound (VOC) Content Limitations [326 IAC 8-1-2]**

(a) Pursuant to 326 IAC 8-1-2 (b), the surface coating Lines 5, 6, and 7 VOC emissions shall be limited to no greater than the equivalent emissions (E), expressed as pounds of VOC per gallon of coating solids, as allowed in Condition D.1.3.

This equivalency was determined by the following equation:

\[ E = \frac{L}{1 - \left(\frac{L}{D}\right)} \]

Where
- **E** = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- **L** = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- **D** = Baseline solvent density of VOC in coating and shall be equal to 7.36
pounds per gallon of solvent;

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

(b) The pounds of VOC per gallon of coating solids shall be limited to less than 4.52 pounds of VOC per gallon of coating solids as applied.

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizers (RTO1 and TO2) shall be no less than the equivalent overall efficiency calculated by the following equation:

\[ O = \frac{V - E}{V} \times 100 \]

Where:

- \( V \) = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- \( E \) = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- \( O \) = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizers shall be greater than the following:

<table>
<thead>
<tr>
<th>Lines</th>
<th>RTO1 Efficiency (%)</th>
<th>TO2 Efficiency (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 and 6</td>
<td>78%</td>
<td>-</td>
</tr>
<tr>
<td>7</td>
<td>-</td>
<td>78%</td>
</tr>
</tbody>
</table>

**Compliance Monitoring Requirements** [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.11 Thermal Oxidizer/RTO Temperature [40 CFR 64]

- **(a)** A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers RTO1 and TO2 for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour average.

- **(b)** The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, and D.1.3.

- **(c)** On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the latest compliant stack test.

- **(d)** If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature reading below the above mentioned 3-hour average temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this
permit.

D.1.12 Thermal Oxidizer/RTO Duct Pressure or Fan Amperage [40 CFR 64]

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the manufacturer's specification that demonstrates compliance with limits in Conditions D.1.1, D.1.2, and D.1.3.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established by the manufacturer specifications.

(c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(d) The instruments used for determining the pressure drop shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirement

(a) In order to document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.1.1.

(1) The VOC content of each coating material and solvent used;

(2) The amount of coating material and solvent used less water on monthly basis, for each coating line;

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage, including coating, dilution solvents, and cleaning solvents, for each month and each compliance period.

(4) The total VOC usage for each month and each compliance period, for each line.

(b) In order to document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the single and combined HAP limit established in Condition D.1.2.
(1) The amount of HAP content of each coating material and solvent used, for each coating line. Records shall include inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use; and

(3) The single and combined HAP usage for each month and each compliance period.

(c) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.3.

(1) The VOC content per gallon of coating solids, as applied, of each coating material.

(2) The amount of each coating material and solvent used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(d) To document the compliance status with Condition D.1.11, the Permittee shall maintain continuous temperature records for the thermal oxidizers RTO1 and TO2 and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(e) To document the compliance status with Condition D.1.12, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers RTO1 and TO2. The Permittee shall include in its daily record when the readings are not taken and the reason for the lack of the readings (e.g. the process did not operate that day).

(f) Section C - General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.

D.1.14 Reporting Requirements

A summary of the information to document the compliance status with D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1(35).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities:

(b) One (1) Maintenance Parts Washer, with a maximum usage rate of 140 gallons per year, using no controls, and exhausting indoors.

(c) One (1) Litho Parts Washer, with a maximum usage rate of 80 gallons per year, using no controls, and exhausting indoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

1. Equip the degreaser with a cover.
2. Equip the degreaser with a device for draining cleaned parts.
3. Close the degreaser cover whenever parts are not being handled in the degreaser.
4. Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
5. Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
6. Store waste solvent only in closed containers.
7. Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

1. Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
   (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
   (B) A water cover when solvent used is insoluble in, and heavier than, water.
   (C) A refrigerated chiller.
   (D) Carbon adsorption.
   (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
   (A) must be a solid, fluid stream; and
   (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

   (1) The name and address of the solvent supplier.

   (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

   (3) The type of solvent purchased.

   (4) The total volume of the solvent purchased.

   (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Insignificant Activities:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b) One (1) Enclosed MicroClean System, installed in 1988, with a maximum throughput of 50 pounds of grit per hour, using a filtration system as control, and exhausting indoors.</td>
</tr>
</tbody>
</table>

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards  [326 IAC 2-7-5(1)]

D.3.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the MicroClean System shall not exceed 0.551 pounds per hour when operating at a process weight rate of 50 pounds per hour.

D.3.2 Preventive Maintenance Plan  [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- [ ] Annual Compliance Certification Letter
- [ ] Test Result (specify)
- [ ] Report (specify)
- [ ] Notification (specify)
- [ ] Affidavit (specify)
- [ ] Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:
This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control Equipment:</td>
</tr>
<tr>
<td>Permit Condition or Operation Limitation in Permit:</td>
</tr>
<tr>
<td>Description of the Emergency:</td>
</tr>
<tr>
<td>Describe the cause of the Emergency:</td>
</tr>
</tbody>
</table>
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>If any of the following are not applicable, mark N/A</th>
<th>Page 2 of 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency started:</td>
<td></td>
</tr>
<tr>
<td>Date/Time Emergency was corrected:</td>
<td></td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOx, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
<td></td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: ____________________________
Phone: ____________________________
### Part 70 Quarterly Report

**Source Name:** Crown Cork & Seal USA, Inc.
**Source Address:** 400 N. Walnut Street, Crawfordsville, Indiana 47933
**Part 70 Permit No.:** T107-40834-00004
**Facility:** Lines 5, 6, & 7 and cleanup solvents
**Parameter:** VOC input

**Limit:** The VOC input, including coatings, dilution solvents, and cleaning solvents, to the Lines 5, 6, and 7 and the cleanup solvents shall be limited such that the VOC emissions shall not exceed two hundred 245.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER :</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
<tr>
<td></td>
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</tr>
</tbody>
</table>

- □ No deviation occurred in this quarter.
- □ Deviation/s occurred in this quarter.
  Deviation has been reported on:

Submitted by: ______________________
Title / Position: ______________________
Signature: ______________________
Date: ______________________
Phone: ______________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Crown Cork & Seal USA, Inc.
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-40834-00004
Facility: Lines 5, 6, & 7 and cleanup solvents
Parameter: Highest Single HAP
Limit: The combined single HAP emissions from Lines 5, 6, and 7 and the cleanup solvents shall not exceed nine (9) tons per twelve (12) consecutive month period, combined, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
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</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
  Deviation has been reported on:

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Crown Cork & Seal USA, Inc.
Source Address: 400 N. Walnut Street, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-40834-00004
Facility: Lines 5, 6, & 7 and cleanup solvents
Parameter: Total combined HAP

Limit: The total combined HAP emissions from Lines 5, 6, and 7 and the cleanup solvents shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: ___________________ YEAR: ___________________

<table>
<thead>
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<th>Column 2</th>
<th>Column 1 + Column 2</th>
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<td>0</td>
</tr>
</tbody>
</table>

- □ No deviation occurred in this quarter.
- □ Deviation/s occurred in this quarter.
  Deviation has been reported on:

Submitted by: ___________________________
Title / Position: _______________________
Signature: _____________________________
Date: _________________________________
Phone: _______________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
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<tbody>
<tr>
<td>Number of Deviations:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<td></td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
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<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<tr>
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</tr>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
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<tr>
<td>Number of Deviations:</td>
<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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<tr>
<td>Date of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
On December 18, 2018, Crown Cork & Seal USA, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Crown Cork & Seal USA, Inc. relating to the operation of a stationary punch press, printing and sheet coating operation for the purpose of fabricating metal cans, crowns, and other miscellaneous metal container parts. Crown Cork & Seal USA, Inc. was issued its second Part 70 Operating Permit Renewal (T107-34056-00004) on September 19, 2014.

The source consists of the following permitted emission units:

(a) One (1) sheet coater booth, identified as Line 5, constructed in 1988, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 5 Oven, with a maximum heat input capacity of 4.0 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth is utilized.

(b) One (1) sheet coater booth, identified as Line 6, constructed in 1988, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 6 Oven, with a maximum heat input capacity of 6.0 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1. A permanent total enclosure for the sheet coater booth is utilized.

(c) One (1) sheet coater booth, identified as Line 7, constructed in 2011, coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, having a maximum line speed of 5,400 sheets per hour and a maximum of 0.00283 gallons per sheet, application method is roll coating, using a thermal oxidizer, TO2, as control, exhausting to stack I-2. A permanent total enclosure for the sheet coater booth (Line 7) is utilized. The excess heat from the thermal oxidizer is redirected for drying purposes for Line 7.
(d) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO1, consisting of two (2) burners each with a maximum heat input rating of 4.0 MMBtu per hour and used as control for Lines 3, 5 and 6. Constructed in 1988 and exhausting to stack I-1.

(e) One (1) natural gas-fired thermal oxidizer, identified as TO2, constructed in 2011, equipped with a 3.8 MMBtu per hour burner, with heat being recirculated to the drying oven for Line 7 after burn-off.

### Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) One (1) UV press line, equipped with one (1) sheet coater booth, identified as Line 2, constructed in 1996, decorating and coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, maximum line speed is 4,500 sheets per hour, application method is roll coating, using a UV oven to cure, using a regenerative thermal oxidizer, RTO1, to control emissions, exhausting to stack I-1.

(b) One (1) heatset offset litho press line equipped with a sheet coater booth identified as Line 3, constructed in 1988, decorating and coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, each having a maximum line speed of 3,600 sheets per hour, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 3 Oven, with a maximum heat input capacity of 2.5 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, and exhausting to stack I-1.

(c) One (1) heatset offset litho press line equipped with a sheet coater booth identified as Line 4, constructed in 1988, decorating and coating metal sheets for metal cans, crowns, and other miscellaneous metal container parts, each having a maximum line speed of 4,500 sheets per hour, application method is roll coating, cured by one (1) natural gas-fired drying oven, identified as Line 4 Oven, with a maximum heat input capacity of 2.5 MMBtu per hour, constructed in 1988, using a regenerative thermal oxidizer, RTO1, to control emissions, and exhausting to stack I-1.

(d) Printing plant room parts washer.

### Insignificant Activities

The source also consists of the following insignificant activities:

(a) Paved and unpaved roads and parking lots with public access.

(b) One (1) Maintenance Parts Washer, with a maximum usage rate of 140 gallons per year, using no controls, and exhausting indoors.

(c) One (1) Litho Parts Washer, with a maximum usage rate of 80 gallons per year, using no controls, and exhausting indoors.

(d) One (1) non-mechanical dip and manual General Wash up, used to clean off-line rollers, with a maximum usage rate of 20,222.5 gallons per year, using no controls, and exhausting indoors.

The source also consists of the following emission units that were constructed and/or operated without a permit:

(a) One (1) Enclosed MicroClean System, installed in 1988, with a maximum throughput of 50 pounds of grit per hour, using a filtration system as control, and exhausting indoors.
Enforcement Issue

IDEM is aware that there is a pending enforcement action for failing to operate the minimum temperatures and maintain records for thermal oxidizers RTO1 and TO2. IDEM is reviewing this matter and will take the appropriate action.

IDEM is also aware that equipment has been constructed and/or operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and/or operating rules.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Montgomery County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Montgomery County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Montgomery County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on
August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM¹</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP = Xylene

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. The source will be issued a Part 70 Operating Permit Renewal.
Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>6.75</td>
<td>5.31</td>
<td>5.31</td>
<td>0.06</td>
<td>9.36</td>
<td>245.51</td>
<td>7.86</td>
<td>9.00</td>
<td>24.00</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
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<td>100</td>
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<td>25</td>
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<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP.
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Metal Furniture 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for this source, because this source does not coat metal furniture. This source coats sheets of metal that are shipped off to other sites to be constructed into food or aerosol 3 piece can components.

(b) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing 40 CFR 60, Subpart QQ and 326 IAC 12, are not included in the permit for this source, because this source does not use rotogravure presses. This source does not use web or flexographic fed material, instead this source uses feeds sheets of metal into the coaters. Lines 5, 6, and 7 are sheet coaters. This source utilizes sheet/roll coaters that are similar to lithographic except they do not apply ink/decoration.

(c) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations 40 CFR 60, Subpart RR and 326 IAC 12, are not included in the permit for this source, because this source does not coat pressure sensitive tape or labels.

(d) The requirements of the New Source Performance Standard for Metal Coil Surface Coating 40 CFR 60, Subpart TT and 326 IAC 12, are not included in the permit for this source, because this source does not coat metal coil. This source coats sheets of metal that are shipped off to other sites to be constructed into food or aerosol 3 piece can components.

(e) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry 40 CFR 60, Subpart WW and 326 IAC 12, are not included in the permit for this source, because this source does not coat beverage cans. This source coats sheets of metal that are shipped off to other sites to be constructed into food or aerosol 3 piece can components.

(f) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry 40 CFR 63, Subpart KK and 326 IAC 20-18 are not included in the permit for this source, since this source does not print or publish. This source utilizes sheet/roll coaters that are similar to lithographic except they do not apply ink/decoration.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Cans 40 CFR 63, Subpart KKKK and 326 IAC 20-86 are not included in the permit for this source, since the source is not a major source of HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products 40 CFR 63, Subpart MMMM and 326 IAC 20-80 are not included in the permit for this source, since this source is not a major source of HAPs.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Coil 40 CFR 63, Subpart SSSS and 326 IAC 20-64 are not included in the permit for this source, since this source is not coating metal coils. This source coats flat sheets of metal.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63,
Subpart HHHHHH (6H) are not included in the permit for this source, since this source does not utilize spray application. Pursuant to 40 CFR 63.11180, *spray applied coating operations means coatings that are applied using a hand held device that creates an atomized mist of coating and deposits the coating on a substrate*. This source utilizes sheet/roll coaters that are similar to lithographic except they do not apply ink/decoration.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR 63, Subpart JJJJJJ (6J) are not included in the permit for this source, since the ovens are not boilers.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63, Subpart XXXXXX (6X) are not included in the permit for this source, since the source does not own or operate any of the nine (9) source categories listed under §63.11514(a).

Pursuant to 40 CFR 60, Subpart XXXXXX Table 1, Fabricated Metal Products are those products such as fire or burglary resistive steel safes, vaults, and other similar products; collapsible tubes of then flexible metal; powder metallurgy products, metal boxes, metal ladders, and metal household articles (e.g. ice cream freezers and ironing boards.)

Similarly, Primary Metals Products Manufacturing includes fabricated wire products (except springs) made from purchased wire. These facilities also manufacture steel balls, nonferrous metal brads and nails, nonferrous metal spikes, staples, and tacks.

This source coats sheets of metal that are shipped off to other sites to be constructed into food or aerosol 3 piece can components.

There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

**Compliance Assurance Monitoring (CAM):**

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to each emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 5/ VOC</td>
<td>RTO</td>
<td>326 IAC 2-2, 326 IAC 8-2-3</td>
<td>444.13</td>
<td>45.30</td>
<td>Y</td>
<td>N</td>
</tr>
</tbody>
</table>
Crown Cork & Seal USA, Inc.  Page 8 of 14
Crawfordsville, Indiana  
TSD for Part 70 Renewal T107-40834-00004
Permit Reviewer: Deena Levering

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 5/ Xylene</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>96.77</td>
<td>9.87</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 5/ Ethylbenzene</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>20.05</td>
<td>2.04</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 5/ Diethylene glycol butyl ether</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>21.20</td>
<td>2.16</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 5/ Naphthalene</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>10.60</td>
<td>1.08</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 5/ MIBK</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>10.02</td>
<td>1.02</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 6/ VOC</td>
<td>RTO</td>
<td>326 IAC 2-2, 326 IAC 8-2-3</td>
<td>444.13</td>
<td>45.30</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 6/ Xylene</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>96.77</td>
<td>9.87</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 6/ Ethylbenzene</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>20.05</td>
<td>2.04</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 6/ Diethylene glycol butyl ether</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>21.20</td>
<td>2.16</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 6/ Naphthalene</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>10.60</td>
<td>1.08</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 6/ MIBK</td>
<td>RTO</td>
<td>40 CFR 63</td>
<td>10.02</td>
<td>1.02</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 7/ VOC</td>
<td>TO</td>
<td>326 IAC 2-2, 326 IAC 8-2-3</td>
<td>375.80</td>
<td>0.15</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 7/ Xylene</td>
<td>TO</td>
<td>40 CFR 63</td>
<td>96.77</td>
<td>1.45</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 7/ Ethylbenzene</td>
<td>TO</td>
<td>40 CFR 63</td>
<td>20.05</td>
<td>0.30</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 7/ Diethylene glycol butyl ether</td>
<td>TO</td>
<td>40 CFR 63</td>
<td>21.20</td>
<td>0.32</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 7/ Naphthalene</td>
<td>TO</td>
<td>40 CFR 63</td>
<td>10.60</td>
<td>0.16</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Line 7/ MIBK</td>
<td>TO</td>
<td>40 CFR 63</td>
<td>10.02</td>
<td>0.15</td>
<td>Y</td>
<td>N</td>
</tr>
</tbody>
</table>

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy. Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator, TO = Thermal Oxidizer

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to Lines 5, 6, and 7 for VOC. A CAM plan was submitted as part of a previous permit application and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

State rule applicability for this source has been reviewed as follows:

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Potential to Emit After Issuance section of this document.

PSD Minor Source Limits
In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The VOC input, including coatings, dilution solvents, and cleaning solvents, to the Lines 5, 6, and 7 and the cleanup solvents shall be limited such that the VOC emissions shall not exceed two hundred forty-five (245) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

State Rule Applicability - Entire Source
Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred and fifty (250) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of Lines 3, 5, 6, and 7 and the cleanup solvent will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Montgomery County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Montgomery County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.
326 IAC 20 (Hazardous Air Pollutants)
In order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

(a) The combined single HAP emissions from Lines 5, 6, and 7 and the cleanup solvents shall not exceed nine (9) tons per twelve (12) consecutive month period, combined, with compliance determined at the end of each month.

(b) The combined total HAP emissions from Lines 5, 6, and 7 and the cleanup solvents shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

**Lines 5, 6, and 7**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(6), the lines are not subject to the requirements of 326 IAC 6-3, since they use roll coating to apply coatings.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Lines 3, 5, 6, and 7 are not subject to the requirements of 326 IAC 8-1-6 because they are regulated by another rule in 326 IAC 8. Lines 3, 5, 6, and 7 are subject to the requirements of 326 IAC 8-2-3, when coating metal cans and 326 IAC 8-2-9.

326 IAC 8-2-3 (VOC Rules: Can Coating Operations)
Pursuant to 326 IAC 8-2-1(a)(4), Lines 5, 6, and 7 are subject to the requirements of 326 IAC 8-2-3 when coating metal sheets for the purpose of fabricating metal cans. Pursuant to 326 IAC 8-2-3, the Permittee shall not allow the discharge into the atmosphere in excess of 2.8 pounds per gallon excluding water, delivered to the coating applicator from two-piece can exterior (basecoat and overvarnish) operations.

326 IAC 8-1-2 (Compliance Methods)
Pursuant to 326 IAC 8-1-2(b)(1), when using non-compliant coatings in Lines 5, 6, and 7, VOC emissions shall be limited to no greater than the equivalent emissions limit (E) of 4.52 pounds of VOC per gallon of coating solids.

(a) Pursuant to 326 IAC 8-1-2(b)(1), VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, as allowed in 326 IAC 8-2-3.

The equivalency was determined by the following equation:

$$E = \frac{L}{(1 - (L/D))}$$

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating less water = 2.8 lb/gal;
D= Baseline solvent density of VOC in the coating and shall be equal to seven and thirty-six hundredths (7.36) pounds of VOC per gallon of solvent;

E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2(a).

\[
= \frac{2.8}{1 - \left(\frac{2.8}{7.36}\right)}
\]

= 4.52 lbs VOC/gal coating solids

The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 4.52.

(b) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the catalytic oxidizer shall be no less than the equivalent overall efficiency necessary to comply with the equivalent emission limitation in (1).

\[
O = \frac{V - E \times 100}{V}
\]

Where:

V = The actual VOC content of the coating, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied = Line 5, 6, and 7 20.6 lb VOC/ gal solids

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied = 4.52 lb VOC per gal coating solids

O = Equivalent overall efficiency of the capture system and control device as a percentage.

\[
O = \frac{V - 4.52 \times 100}{V}
\]

The overall efficiency of the RTO1 and TO2 for Lines 5, 6, and 7 shall each be equal to or greater than overall efficiency and limit listed in the tables below:

<table>
<thead>
<tr>
<th>Lines 5 and 6</th>
<th></th>
<th>Overall Efficiency of RTO1 (%)</th>
<th>Equivalent Emissions Limit E (lb of VOC/gallon of coating solids)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rule Authority</td>
<td>Coatings</td>
<td></td>
<td></td>
</tr>
<tr>
<td>326 IAC 8-2-3</td>
<td>Metal Cans</td>
<td>78%</td>
<td>4.52</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Line 7</th>
<th></th>
<th>Overall Efficiency of TO2 (%)</th>
<th>Equivalent Emissions Limit E (lb of VOC/gallon of coating solids)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rule Authority</td>
<td>Coatings</td>
<td></td>
<td></td>
</tr>
<tr>
<td>326 IAC 8-2-3</td>
<td>Metal Cans</td>
<td>78%</td>
<td>4.52</td>
</tr>
</tbody>
</table>
326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(b)(1), Lines 5, 6, and 7 are not subject to the requirements of 326 IAC 8-2-9, since they are subject to the requirements under 326 IAC 8-2-3 (Can Coating Operations). This source is a support facility for the assembly plants. This source coats steel sheets that are then sent offsite to make food or aerosol 3 piece can components.

Maintenance Parts Washer/Litho Parts Washer/General Wash up

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5), the maintenance parts washer, litho parts washer, and general wash up are not subject to the requirements of 326 IAC 6-3, since they use dip application instead of spray application of coatings.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The parts washers are not subject to the requirements of 326 IAC 8-1-6 because they are regulated by other rules in 326 IAC 8. The parts washers are subject to the requirements of 326 IAC 8-3-2.

326 IAC 8-3-2 (VOC Rules: Cold Cleaner Degreaser Control Equipment and Operating Requirements)
Pursuant to 326 IAC 8-3-1(a)(1) and (c), the maintenance parts washer and litho parts washer are subject to the requirements under 326 IAC 8-3-2, since they are cold cleaner degreasers that were constructed after July 1, 1990 and are located in Montgomery County.

The general wash up is not subject to the requirements of 326 IAC 8-3-2, because the general wash up is a non-mechanical dip tank and manual operation and therefore does not qualify as a cold cleaner, open top, or conveyorized degreaser.

326 IAC 8-3-8 (VOC Rules: Material requirements for cold cleaner degreasers)
Pursuant to 326 IAC 8-3-8(a)(2), the maintenance parts washer and the litho parts washer are subject to the requirements under 326 IAC 8-3-8(b), since they are cold cleaner degreasers that are located in Montgomery County.

The general wash up is not subject to the requirements of 326 IAC 8-3-8, because the general wash up is a non-mechanical dip tank and manual operation and therefore does not qualify as a cold cleaner degreaser.

Natural Gas Combustion (Ovens 3-6, RTO1, Oven/TO2)

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(a), the natural gas combustion units (Ovens 3-6, RTO1, and Oven/TO2) are not subject to the requirements of 326 IAC 6-2-4, since these emission units are direct fired heating units.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the natural gas combustion units were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

MicroClean System

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the MicroClean system, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not
subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the MicroClean system shall not exceed 0.551 pounds per hour when operating at a process weight rate of 50 pounds per hour.

The filtration system shall be in operation at all times the MicroClean System is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Determination Requirements applicable to this source are as follows:

Testing Requirements:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Timeframe for Testing or Date of Initial Valid Demonstration)</th>
<th>Pollutant/ Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lines 5, 6</td>
<td>RTO1</td>
<td>April 5, 2018</td>
<td>Overall VOC and HAP Control Efficiency</td>
<td>every 5 years</td>
<td>326 IAC 2-2</td>
</tr>
<tr>
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<td>HAP Destruction Efficiency</td>
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<td>40 CFR 63</td>
</tr>
<tr>
<td>Line 7</td>
<td>TO2</td>
<td>June 17, 2016</td>
<td>Overall VOC and HAP Control Efficiency</td>
<td>every 5 years</td>
<td>326 IAC 2-2</td>
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<td></td>
<td>HAP Destruction Efficiency</td>
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<td>40 CFR 63</td>
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(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTO1 and TO2</td>
<td>Duct Pressure/Fan Amperage</td>
<td>Daily</td>
<td>Within the normal range established from the manufacturers specifications.</td>
</tr>
<tr>
<td></td>
<td>3-hour average oxidizer temperature monitoring</td>
<td>Continuous</td>
<td>At or above the value established in the most recent compliant stack test.</td>
</tr>
</tbody>
</table>
These monitoring conditions are necessary because the RTO1 and TO2 for the Lines 5, 6, and 7 must operate properly to assure compliance with 326 IAC 2-2, 326 IAC 8-2-3, and 40 CFR 64 (CAM).

### Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

1. For this renewal, IDEM, OAQ has included IDEM’s Master Agency Interest Identification (ID) number of 11826 in the Title V cover page signature box.
2. IDEM, OAQ consolidated D Sections 3, 4, and 5 into one D Section since the limits were the same for all the printing lines.
3. IDEM, OAQ listed out the individual HAPs that are needed for testing (Condition D.1.8) to ensure that the source remains an area source under 40 CFR 63.
4. IDEM, OAQ removed the limits and requirements associated with 326 IAC 8-2-9, since the source is not subject to this rule. See above in the State Rule Applicability - Individual Facilities section for the complete justification.
5. IDEM, OAQ removed the references to 40 CFR 63, Subpart KKKK, since the source is taking limits to remain an area source under 40 CFR 63. See the Federal Rules section above for complete justification.
6. IDEM, OAQ added 326 IAC 8-3-2 requirements to the renewal for the two (2) parts washers.
7. IDEM, OAQ added additional Part 70 Quarterly Reporting forms at the end of the permit for each of the individual HAPs that will need to be limited.

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 18, 2018.

The operation of this stationary punch press, printing and sheet coating operation for the purpose of fabricating metal cans, crowns, and other miscellaneous metal container parts shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. T107-40834-00004.

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved.

### IDEM Contact

(a) If you have any questions regarding this permit, please contact Deena Levering, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5400 or (800) 451-6027, and ask for Deena Levering or (317) 234-5400.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens' Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
### Uncontrolled Potential to Emit (tons/yr)

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<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
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<td>327.98</td>
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<tr>
<td>Line 7</td>
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<tr>
<td>Parts Washers/Solvent Usage</td>
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<td>0.71</td>
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<td>9.36</td>
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<td>4.60</td>
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<td>5.31</td>
<td>5.31</td>
<td>0.06</td>
<td>9.36</td>
<td>1,061.97</td>
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* PM2.5 listed is direct PM2.5

### Potential to Emit after Control (tons/yr)

<table>
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<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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<td>33.45</td>
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<td>77.51</td>
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<tr>
<td>Natural Gas Combustion</td>
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<td>0.71</td>
<td>0.06</td>
<td>9.36</td>
<td>0.51</td>
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<td><strong>Total</strong></td>
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<td>0.06</td>
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* PM2.5 listed is direct PM2.5

### Potential to Emit after Issuance (tons/yr)

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<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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</thead>
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<tr>
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<td>Parts Washers/Solvent Usage</td>
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<td>0.71</td>
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<td><strong>Total</strong></td>
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<td>5.31</td>
<td>0.06</td>
<td>9.36</td>
<td>245.51</td>
<td>7.86</td>
</tr>
</tbody>
</table>

* PM2.5 listed is direct PM2.5

**Note:** The shaded cells indicate where limits are included.
## Appendix A: Emission Calculations

### PTS HAPs Summary

**Company Name:** Crown Cork & Seal USA, Inc.

**Address City, ZIP:** 400 N. Walnut Street, Crawfordsville, Indiana 47933

**Permit No./Plt ID:** T107-40834-00004

**Reviewer:** Deena Levering

### Emission Units

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>Xylene</th>
<th>Ethylbenzene</th>
<th>Isophorone</th>
<th>Toluene</th>
<th>Formaldehyde</th>
<th>Diethylene glycol butyl (Ethanol)</th>
<th>Naphthalene</th>
<th>Cumene</th>
<th>Phenol</th>
<th>MIBK</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Hexane</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Magnese</th>
<th>Nickel</th>
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<tbody>
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<td>2.00</td>
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<td>10.60</td>
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<td>3.28</td>
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<td>20.05</td>
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<td>21.20</td>
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<tr>
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<td>21.20</td>
<td>10.60</td>
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<td>3.28</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### Parts Washers/Solvent Usage

|                          | 32.70  | 5.77          | -         | -       | -               | -                         | -       | -     | -      | -    | -      | -               | -     | -    | -       | -        | -      | -     |

### Natural Gas Combustion

|                          | -      | -             | -         | 3.18E-04 | 7.02E-03       | -                          | -      | 1.97E-04 | 1.12E-04 | 0.17  | 4.68E-05 | 1.03E-04 | 1.31E-04 | 3.56E-05 | 1.97E-04 |

### MicroClean System

|                          | -      | -             | -         | -       | -               | -                          | -     | -       | -       | -    | -      | -               | -     | -    | -       | -        | -      | -     |

### Total

|                          | 323.02 | 65.91         | 5.81      | 6.01    | 0.99           | 63.61                       | 31.81  | 6.36    | 9.84    | 30.07 | 1.97E-04 | 1.12E-04 | 0.17    | 4.68E-05 | 1.03E-04 | 1.31E-04 | 3.56E-05 | 1.97E-04 |

**MIBK** = Methyl Isobutyl Ketone

### Uncontrolled Potential to Emit HAPs (tons per year)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>Xylene</th>
<th>Ethylbenzene</th>
<th>Isophorone</th>
<th>Toluene</th>
<th>Formaldehyde</th>
<th>Diethylene glycol butyl (Ethanol)</th>
<th>Naphthalene</th>
<th>Cumene</th>
<th>Phenol</th>
<th>MIBK</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Hexane</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Magnese</th>
<th>Nickel</th>
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<td>0.22</td>
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<tr>
<td><strong>Line 6</strong></td>
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<td>0.20</td>
<td>0.03</td>
<td>2.16</td>
<td>1.08</td>
<td>0.22</td>
<td>0.33</td>
<td>1.02</td>
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</tr>
<tr>
<td><strong>Line 7</strong></td>
<td>1.45</td>
<td>0.30</td>
<td>0.03</td>
<td>0.03</td>
<td>0.00</td>
<td>0.32</td>
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<td>0.03</td>
<td>0.05</td>
<td>0.15</td>
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<td>-</td>
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<td>-</td>
</tr>
</tbody>
</table>

### Parts Washers/Solvent Usage

|                          | 32.70  | 5.77          | -         | -       | -               | -                          | -       | -     | -      | -    | -      | -               | -     | -    | -       | -        | -      | -     |

### Natural Gas Combustion

|                          | -      | -             | -         | 3.18E-04 | 7.02E-03       | -                          | -      | 1.97E-04 | 1.12E-04 | 0.17  | 4.68E-05 | 1.03E-04 | 1.31E-04 | 3.56E-05 | 1.97E-04 |

### MicroClean System

|                          | -      | -             | -         | -       | -               | -                          | -     | -       | -       | -    | -      | -               | -     | -    | -       | -        | -      | -     |

### Total

|                          | 53.90  | 10.16         | 0.42       | 0.44    | 0.08           | 4.64                         | 2.32       | 0.46   | 0.72   | 2.20 | 0.00    | 0.00             | 0.17  | 0.00 | 0.00    | 0.00      | 0.00   | 0.00   |

**MIBK** = Methyl Isobutyl Ketone

### Controlled Potential to Emit HAPs (tons per year)

<table>
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<tr>
<th>Emission Units</th>
<th>Xylene</th>
<th>Ethylbenzene</th>
<th>Isophorone</th>
<th>Toluene</th>
<th>Formaldehyde</th>
<th>Diethylene glycol butyl (Ethanol)</th>
<th>Naphthalene</th>
<th>Cumene</th>
<th>Phenol</th>
<th>MIBK</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Hexane</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
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<th>Nickel</th>
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<tr>
<td><strong>Line 6</strong></td>
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<td>0.33</td>
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</tbody>
</table>

### Parts Washers/Solvent Usage

|                          | -      | -             | -         | -       | -               | -                          | -     | -       | -      | -    | -      | -               | -     | -    | -       | -        | -      | -     |

### Natural Gas Combustion

|                          | -      | -             | -         | 3.18E-04 | 7.02E-03       | -                          | -      | 1.97E-04 | 1.12E-04 | 0.17  | 4.68E-05 | 1.03E-04 | 1.31E-04 | 3.56E-05 | 1.97E-04 |

### MicroClean System

|                          | -      | -             | -         | -       | -               | -                          | -     | -       | -      | -    | -      | -               | -     | -    | -       | -        | -      | -     |

### Total

|                          | 9.00   | 9.00          | 5.81      | 6.01    | 0.99           | 9.00                         | 9.00       | 6.36   | 9.84   | 9.00 | 1.97E-04 | 1.12E-04 | 0.17    | 4.68E-05 | 1.03E-04 | 1.31E-04 | 3.56E-05 | 1.97E-04 |

**MIBK** = Methyl Isobutyl Ketone

### Combined Total

|                          | 75.51  | 75.51         | 75.51     | 75.51    | 75.51          | 75.51                         | 75.51      | 75.51  | 75.51  | 75.51| 75.51   | 75.51             | 75.51 | 75.51| 75.51   | 75.51      | 75.51  | 75.51  | 75.51   | 75.51     | 75.51  | 75.51  |

**MIBK** = Methyl Isobutyl Ketone
# Appendix A: Emissions Calculations

**VOC Lines 3, 5, 6, and 7**

**Surface Coating**

- **Company Name:** Crown Cork & Seal USA, Inc.
- **Address City:** Crawfordsville, Indiana
- **Address IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933
- **Permit No./Pt ID:** T107-40834-00004
- **Reviewer:** Deena Levering

The source only uses one coating material at a time. The following are the top five highest VOC coating materials (provided by the source) that they use. The total is the maximum from each line.

<table>
<thead>
<tr>
<th>Material</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum throughput (units/hr)</th>
<th>VOC content (lbs/gal)</th>
<th>Potential VOC (lbs/hr)</th>
<th>Potential VOC (lbs/day)</th>
<th>Overall Control Efficiency</th>
<th>Controlled VOC (tons/yr)</th>
<th>Pounds VOC per Gallon Solids</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Line 5</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9851629/ GOLD</td>
<td>0.00167</td>
<td>5,400</td>
<td>4.90</td>
<td>44.19</td>
<td>1060.52</td>
<td>193.54</td>
<td>89.80%</td>
<td>19.74</td>
</tr>
<tr>
<td>20567WE/ Modified Polyester</td>
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<td>5.50</td>
<td>48.41</td>
<td>1161.86</td>
<td>212.04</td>
<td>89.80%</td>
<td>21.26</td>
</tr>
<tr>
<td>31346AS/ Valpure V3146 Gold Enamel</td>
<td>0.00283</td>
<td>5,400</td>
<td>4.90</td>
<td>74.88</td>
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<td>89.80%</td>
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**Total**

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<th>VOC content (lbs/gal)</th>
<th>Potential VOC (lbs/hr)</th>
<th>Potential VOC (lbs/day)</th>
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<th>Controlled VOC (tons/yr)</th>
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**Methodology**

- **Note:** The source roll coats on all lines. There are no particulate emissions (PM, PM10, or PM2.5) associated with roll coatings.

- These coatings are the worst case scenarios for both miscellaneous metal products and metal cans. The source does not coat beverage cans.

Potential VOC (lbs/hr) = VOC Content (lbs/gal) * Gallons of Material (gal/unit) * Maximum throughput (units/hr)

Potential VOC (lbs/day) = VOC Content (lbs/gal) * Gallons of Material (gal/unit) * Maximum throughput (units/hr) * (24 hrs/day)

Potential VOC (tons/yr) = VOC Content (lbs/gal) * Gallons of Material (gal/unit) * Maximum throughput (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

Controlled VOC (tons/yr) = Potential VOC (tons/yr) * (1-Overall Control Efficiency)

- Overall Control Efficiency for Lines 5, and 6 is based on the worst case control efficiency for metal can coatings because no valid test data can be used at this time.

- Overall Control Efficiency for Line 7 is based on the most recent valid stack test control efficiency from June 23, 2011.
### Appendix A: Emissions Calculations

#### HAPs Lines 3, 5, 6, and 7

**Surface Coating**

**Company Name:** Crown Cork & Seal USA, Inc.

**Address City:** Crawfordsville, Indiana 47933

**Permit No./Plt ID:** T107-40834-00004

**Reviewer:** Deena Levering

### Material Table

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<th>Gallons of Material (gal/unit)</th>
<th>Maximum throughput (units/hr)</th>
<th>VOC content (lbs/gal)</th>
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<th>Weight % Ethylbenzene</th>
<th>Weight % Isophorone</th>
<th>Weight % Toluene</th>
<th>Weight % Formaldehyde</th>
<th>Weight % Diethylene glycol butyl ether (Ethanol)</th>
<th>Weight % Naphthalene</th>
<th>Weight % Cumene</th>
<th>Weight % Phenol</th>
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### Uncontrolled Potential to Emit (tons per year)

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**Total for All Lines:**

- Xylene: 290.32
- Ethylbenzene: 60.14
- Isophorone: 5.81
- Toluene: 6.01
- Diethylene glycol butyl ether (Ethanol): 0.98
- Naphthalene: 63.61
- Cumene: 31.81
- Phenol: 6.36
- MIBK: 9.84
- Total Combined HAPs: 504.95

MIBK = Methyl Isobutyl Ketone
### Controlled Potential to Emit (tons per year)

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</tr>
<tr>
<td>9851629/GOLD</td>
<td>98.50%</td>
<td>1.46</td>
<td>0.29</td>
<td>0.03</td>
<td>0.03</td>
<td>0.00</td>
<td></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.15</td>
<td>1.65</td>
</tr>
<tr>
<td>20567/W/ Modified Polyester</td>
<td>98.50%</td>
<td>0.16</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.32</td>
<td>0.16</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>0.70</td>
</tr>
<tr>
<td>31S46AS/ Valpure V3146 Gold Enamel</td>
<td>98.50%</td>
<td>0.49</td>
<td>0.15</td>
<td>-</td>
<td>0.01</td>
<td>0.00</td>
<td>-</td>
<td>0.15</td>
<td>-</td>
<td>0.05</td>
<td>-</td>
<td>0.86</td>
</tr>
<tr>
<td>9372019/ CLR Epoxy</td>
<td>98.50%</td>
<td>0.75</td>
<td>0.30</td>
<td>-</td>
<td>0.03</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.15</td>
<td>-</td>
<td>1.24</td>
</tr>
<tr>
<td>PPG 5900001/ White Interior Enamel</td>
<td>98.50%</td>
<td>0.03</td>
<td></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.14</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.17</td>
</tr>
<tr>
<td><strong>Line 7 Total</strong></td>
<td></td>
<td>1.45</td>
<td>0.30</td>
<td>0.03</td>
<td>0.03</td>
<td>0.00</td>
<td>0.32</td>
<td>0.16</td>
<td>0.03</td>
<td>0.05</td>
<td>-</td>
<td>0.15</td>
</tr>
<tr>
<td><strong>Total for All Lines</strong></td>
<td></td>
<td>21.19</td>
<td>4.39</td>
<td>0.42</td>
<td>0.44</td>
<td>0.07</td>
<td>4.64</td>
<td>2.32</td>
<td>0.46</td>
<td>0.72</td>
<td>2.20</td>
<td></td>
</tr>
<tr>
<td><strong>Total Combined HAPs</strong></td>
<td></td>
<td>36.86</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Overall Control Efficiency for Lines 5 and 6 is based on the worst case control efficiency for metal can coatings because no valid test data can be used at this time.

Overall Control Efficiency for Line 7 is based on the most recent valid stack test control efficiency from June 23, 2011.

MBIK = Methyl Isobutyl Ketone

**Methodology**

These coatings are the worst case scenarios for both miscellaneous metal products and metal cans. The source does not coat beverage cans.  

Uncontrolled HAP Emissions (tons/year) = Density (lbs/gallon) * Gallons of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 1 ton/2,000 lbs * 8,760 hours/1 year

Controlled HAP Emissions (tons/year) = Uncontrolled HAP Emissions (tons/year) * (1 - Control Efficiency)
### Appendix A: Emissions Calculations

#### Solvent Usage

**Company Name:** Crown Cork & Seal USA, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit No./Plt ID:** T107-40834-00004  
**Reviewer:** Deena Levering

<table>
<thead>
<tr>
<th>Name</th>
<th>Solvent Used</th>
<th>Gallons of Material (gallon/unit)</th>
<th>Maximum (Units/hour)</th>
<th>Usage Rate (gallons per year)</th>
<th>Density</th>
<th>Weight % VOC</th>
<th>VOC Emissions (tons/year)</th>
<th>Weight % Xylene</th>
<th>Weight % Ethyl Benzene</th>
<th>Xylene Emissions (tons/year)</th>
<th>Ethyl Benzene Emissions (tons/year)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance Parts Washer</td>
<td>Crystal Clean 142</td>
<td>-</td>
<td>-</td>
<td>140</td>
<td>6.08</td>
<td>100%</td>
<td>0.57</td>
<td>0%</td>
<td>0%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Litho Parts Washer</td>
<td>S-3439</td>
<td>-</td>
<td>-</td>
<td>80</td>
<td>7.58</td>
<td>100%</td>
<td>0.30</td>
<td>42.50%</td>
<td>7.50%</td>
<td>0.13</td>
<td>0.02</td>
<td>0.15</td>
</tr>
<tr>
<td>non-mechanical dip and manually applied General Wash Up</td>
<td>S-3439</td>
<td>0.000513</td>
<td>4,500</td>
<td>20,222.5</td>
<td>7.58</td>
<td>100%</td>
<td>76.64</td>
<td>42.50%</td>
<td>7.50%</td>
<td>32.57</td>
<td>5.75</td>
<td>38.32</td>
</tr>
</tbody>
</table>

**Methodology**

- **VOC Emissions (tons/year) = Usage Rate (gallons/year) * Density (lbs/gallon) * Weight % VOC * (1 ton/2,000 lbs)**
- **HAP Emissions (tons/year) = Usage Rate (gallons/year) * Density (lbs/gallon) * Weight % HAP * (1 ton/2,000 lbs)**

General wash up includes cleaning of the coating lines but it does not include solvent used in the parts washers.

Usage Rate (gallons per year) = Gallons of Material (gallon/unit) * Maximum (units/hour) * 8,760 hours/year

These solvents are not controlled by the thermal oxidizers.
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

**Company Name:** Crown Cork & Seal USA, Inc.  
**Address City IN Zip:** 400 N. Walnut Street, Crawfordsville, Indiana 47933  
**Permit No./Plt ID:** T107-40834-00004  
**Reviewer:** Deena Levering

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmbtu/MMCF/yr</td>
<td></td>
</tr>
<tr>
<td></td>
<td>mmscf</td>
<td></td>
</tr>
<tr>
<td>Oven 1</td>
<td>8.0 (2 burners at 4 MMBtu/hr each)</td>
<td></td>
</tr>
<tr>
<td>Oven 2</td>
<td>4.0</td>
<td></td>
</tr>
<tr>
<td>Oven 3</td>
<td>6.0</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>21.8</td>
<td></td>
</tr>
<tr>
<td>8,760 hrs/yr x 1 MMCF/1,020 MMBtu</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emission (tons/yr)</td>
<td>1020</td>
<td></td>
</tr>
</tbody>
</table>

### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>1.9</td>
<td>0.18</td>
</tr>
<tr>
<td>PM10</td>
<td>7.6</td>
<td>0.71</td>
</tr>
<tr>
<td>direct PM2.5</td>
<td>7.6</td>
<td>0.71</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>5.62E-02</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>9.36</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.51</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>7.86</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.**

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32**

### Methodology

All emission factors are based on normal firing.  

**MMBtu = 1,000,000 Btu**  
**MMCF = 1,000,000 Cubic Feet of Gas**  
**Emission Factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03**

### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>1.76E-01</td>
</tr>
</tbody>
</table>

### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>5.13E-04</td>
</tr>
</tbody>
</table>

### Total HAPs

<table>
<thead>
<tr>
<th>Total HAPs</th>
<th>1.77E-01</th>
</tr>
</thead>
</table>

**Methodology is the same as above.**

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

\[
\text{FR} = \text{Flow rate of actual abrasive (lb/hr)} = 50.00 \text{ lb/hr (per nozzle)} \\
\text{w} = \text{fraction of time of wet blasting} = 0 \% \\
N = \text{number of nozzles} = 3 \\
\text{EF} = \text{PM emission factor for actual abrasive from Table 1} = 0.010 \text{ lb PM/lb abrasive} \\
\text{PM10 emission factor ratio for actual abrasive from Table 1} = 0.70 \text{ lb PM10/lb PM} \\
\]

\[
\text{Potential to Emit (before control)} = \frac{\text{EF} \times \text{FR} \times (1 - \frac{\text{w}}{200}) \times N}{8760 \text{ hours/year} \times \frac{1}{2000 \text{ lbs}}} \\
= \frac{0.010 \times 50.00 \times (1 - \frac{0}{200}) \times 3}{8760 \times \frac{1}{2000}} \\
= \frac{1.50 \times 1.05 \times 1.05}{6.57 \times 4.60 \times 4.60} \text{ lb/hr} \\
= 36.00 \text{ lb/day} \\
= 0.02 \text{ ton/yr} \\
= 0.01 \text{ ton/yr} \\
= 0.01 \text{ ton/yr} \\
\]

Potential to Emit After Control

\[
\text{Potential to Emit (after control)} = \text{Potential to Emit (before control)} \times \text{Emission Control Device Efficiency} \\
= 0.02 \times 99.0\% \times 99.0\% \times 99.0\% \text{ lb/hr} \\
= 0.066 \text{ lb/hr} \\
= 0.046 \text{ lb/day} \\
= 0.046 \text{ ton/yr} \\
\]

METHODOLOGY

PM2.5 emissions assumed equal to PM10 emissions.


Potential to Emit (before control) = \text{EF} \times \text{FR} \times (1 - \frac{\text{w}}{200}) \times N 

\text{(where w should be entered in as a whole number (if w is 50\%, enter 50))}

Potential to Emit (after control) = \text{Potential to Emit (before control)} \times \text{1 - control efficiency}

Potential to Emit (tons/year) = \text{Potential to Emit (lbs/hour)} \times (8760\text{ hours/ year}) \times \frac{\text{ton}}{2000\text{ lbs}}
Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Crown Cork & Seal USA, Inc.
Address City, IN Zip: 400 N. Walnut Street, Crawfordsville, Indiana 47933
Permit No./Plt ID: T107-45834-00004
Reviewer: Deena Levering

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (ton/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip) (Empty Trucks)</td>
<td>11.3</td>
<td>1.0</td>
<td>11.3</td>
<td>16.0</td>
<td>180.8</td>
<td>900</td>
<td>0.170</td>
<td>1.9</td>
<td>702.9</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) (Full Trucks)</td>
<td>11.3</td>
<td>1.0</td>
<td>11.3</td>
<td>48.0</td>
<td>542.3</td>
<td>900</td>
<td>0.170</td>
<td>1.9</td>
<td>702.9</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) (Empty Trucks)</td>
<td>11.3</td>
<td>1.0</td>
<td>11.3</td>
<td>16.0</td>
<td>180.8</td>
<td>900</td>
<td>0.170</td>
<td>1.9</td>
<td>702.9</td>
</tr>
<tr>
<td>Vehicle (entering plant) (one-way trip) (Full Trucks)</td>
<td>11.3</td>
<td>1.0</td>
<td>11.3</td>
<td>48.0</td>
<td>542.3</td>
<td>900</td>
<td>0.170</td>
<td>1.9</td>
<td>702.9</td>
</tr>
</tbody>
</table>

Totals: 45.2 1446.0 7.7 2811.5

Average Vehicle Weight Per Trip = 32.0 tons/trip
Average Miles Per Trip = 0.17 miles/trip

Unmitigated Emission Factor, \( EF \) = \[ \frac{k \cdot (sL)^{0.91} \cdot (W)^{1.02}}{5280} \] (Equation 1 from AP-42 13.2.1)

where \( k \) = 0.011 0.0022 0.00054 lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
\( W \) = 32.0 32.0 32.0 tons = average vehicle weight
\( sL \) = 9.7 9.7 9.7 g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Mitigated Emission Factor, \( E_{ext} \) = \( EF \cdot \left[1 - \frac{p}{4N}\right] \) (Equation 2 from AP-42 13.2.1)

where \( p \) = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
\( N \) = 365 days per year

Taking natural mitigation due to precipitation into consideration. Unmitigated Emission Factor, \( EF \) = \[ \frac{[k \cdot (sL)^{0.91} \cdot (W)^{1.02}]}{5280} \] (Equation 1 from AP-42 13.2.1)

Mitigated Emission Factor, \( E_{ext} \) = \[ \frac{[k \cdot (sL)^{0.91} \cdot (W)^{1.02}]}{5280} \cdot \left[1 - \frac{p}{4N}\right] \]

PM = Particulate Matter
PM10 = Particle Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip) (Empty Trucks)</td>
<td>0.96</td>
<td>0.19</td>
<td>0.05</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) (Full Trucks)</td>
<td>0.96</td>
<td>0.19</td>
<td>0.05</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) (Empty Trucks)</td>
<td>0.96</td>
<td>0.19</td>
<td>0.05</td>
</tr>
<tr>
<td>Vehicle (entering plant) (one-way trip) (Full Trucks)</td>
<td>0.96</td>
<td>0.19</td>
<td>0.05</td>
</tr>
</tbody>
</table>

Totals: 3.83 0.77 0.19

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (ton/trip) * (Maximum trips per day (trip/day))]
Maximum one-way distance (mile/trip) = [Maximum one-way distance (mile/trip)]
Maximum one-way miles (miles/day) = [Maximum one-way distance (mile/trip)]
Average Vehicle Weight Per Trip = \[ \frac{SUM\{Total Weight driven per day (ton/day) \}}{SUM\{Maximum trips per day (trip/day)\}} \]
Average Miles Per Trip = \[ \frac{SUM\{Maximum one-way miles (miles/day)\}}{SUM\{Maximum trips per day (trip/day)\}} \]
Unmitigated PTE (ton/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (Before Control) (ton/yr) = [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (After Control) (ton/yr) = [Mitigated PTE (Before Control) (ton/yr)] * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
PM10 = Particle Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

October 22, 2019

James Munroe
CROWN CORK & SEAL COMPANY INC
400 N Walnut St
Crawfordsville, IN  47933

Re: Public Notice
Crown Cork & Seal USA
Permit Level: Title V Renewal
Permit Number: 107-40834-00004

Dear James Munroe:

Enclosed is a copy of your draft Title V Renewal, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Crawfordsville District Public Library, 205 S. Washington St. in Crawfordsville IN 47933. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Deena Levering, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5400 or dial (317) 234-5400.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
October 22, 2019

To: Crawfordsville District Public Library 205 S. Washington St. Crawfordsville IN 47933 (Library)

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Crown Cork & Seal USA
Permit Number: 107-40834-00004

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

October 22, 2019
Crown Cork & Seal USA
107-40834-00004

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 4/12/2019
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

October 22, 2019

A 30-day public comment period has been initiated for:

Permit Number:  107-40834-00004
Applicant Name:  Crown Cork & Seal USA
Location:  Crawfordsville, Montgomery County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN  46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017
## Mail Code 61-53

### IDEM Staff
LPOGOST 10/22/2019
CROWN CORK & SEAL COMPANY INC 107-40834-00004 (draft)

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<tr>
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<td>1</td>
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<td>James Munroe CROWN CORK &amp; SEAL COMPANY INC 400 N. Walnut St Crawfordsville IN 47933 (Source CAATS)</td>
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<td>Crawfordsville City Council and Mayors Office 300 E. Pike St Crawfordsville IN 47933 (Local Official)</td>
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<td>Montgomery County Health Department 110 W. South Blvd Suite 100 Crawfordsville IN 47933-3351 (Health Department)</td>
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<td>Ms. Magie Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)</td>
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<td>Crawfordsville District Public Library 205 S. Washington St. Crawfordsville IN 47933 (Library)</td>
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