

RESPONSE TO COMMENTS

BALL METAL FOOD CONTAINER CORP.

PERMIT #0782-AOP-R7

AFIN: 72-00048

On August 10, 2013, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, an approval was granted for the facility by Department. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Comment #1:

In a request dated September 25, 2013, the facility requested approval to convert Can Line 5, a line that currently makes food cans, into a line that will make aerosol cans. The change will not result in an increase in emissions, and will not involve the use of any new coatings.

Response to Comment #1:

In a letter dated October 10, 2013, the facility was granted approval for the above request. SN-14, Can Line #5 has been renamed Aerosol Can Line.

ADEQ

ARKANSAS
Department of Environmental Quality

November 26, 2013

John Munsch
Principal Environmental Engineer
Ball Metal Food Container Corp.
P.O. Box 589
Broomfield, CO 80038

Dear Mr. Munsch:

The enclosed Permit No. 0782-AOP-R7 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 4/23/2013.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0782-AOP-R7 for the construction, operation and maintenance of an air pollution control system for Ball Metal Food Container Corp. to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 0782-AOP-R7

IS ISSUED TO:

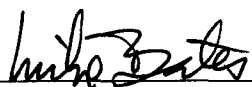
Ball Metal Food Container Corp.
1200 South Crutcher Street
Springdale, AR 72764-6421
Washington County
AFIN: 72-00048

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

January 5, 2010 AND January 4, 2015

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:


Mike Bates
Chief, Air Division

November 26, 2013
Date

Ball Metal Food Container Corp.
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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Ball Metal Food Container Corp.

AFIN: 72-00048

PERMIT NUMBER: 0782-AOP-R7

FACILITY ADDRESS: 1200 South Crutcher Street
Springdale, AR 72764-6421

MAILING ADDRESS: P.O. Box 589
Broomfield, CO 80038

COUNTY: Washington County

CONTACT NAME: John Munsch

CONTACT POSITION: Prinicpal Environmental Engineer

TELEPHONE NUMBER: 303-460-5601

REVIEWING ENGINEER: Derrick Brown

UTM North South (Y): Zone 15: 4003563.01 m

UTM East West (X): Zone 15: 398269.50 m

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SECTION II: INTRODUCTION

Summary of Permit Activity

Ball Metal Food Corporation (Ball) owns and operates a facility in Springdale, Washington County, Arkansas that manufacturer's metal cans used in the food packaging industry. Processes at the facility include metal shearing, punching, welding, and coating. This permit action includes the installation and operation of one additional End Making Line (SN-27) and replacement of the facility's existing thermal oxidizer. The new burner (rated at 4.8 MMBtu/hr) is for the Thermal Oxidizer at SN-23 (Basecoater Lines #1 thru #3). The currently permitted burner (16 MMBtu/hr) shall be removed from the facility's permit. This permit action increases permitted VOC hourly emission only by 8.8 pounds per hour with no annual change. Finally, SN-14 has been renamed Aerosol Can Line.

Process Description

Raw material arrives at the facility in the form of plated steel coils. The coils are unrolled, straightened, and fed into a sheer, which cuts the metal into plates or sheets. The plates are specifically cut for can ends or can bodies. The sheets are stacked and transported to one of the three basecoaters.

The basecoater applies the enamel to the surface of the sheets that will become the interior of the cans. The wet enameled sheets are placed vertically on a wire frame, a wicket, for transportation through the drying oven. Permanent total enclosures surrounding each coater collect the VOC emissions and direct them to a 4.8 MM BTU/hr incinerator. The incinerator also receives the VOC emissions from the three drying ovens.

Coated sheets of plated steel are fed through a punch press which punches out the circular can ends. At the outer edge of each can end is an area called the curl; the curl is a channel in which the end sealing compound is applied. The solvent emissions from the sealing compounds are vented to the atmosphere.

The coated sheets that were coated for can bodies are cut into can body blanks. The body blanks are rolled into a cylinder and the two edges are welded together to form a cylinder or a body blank. An organic lacquer is sprayed inside the can, over the welded seam, to give the can a completely protected surface.

One can end is attached to the can body and the other can end is sold separately and shipped loose. The food canning company attaches and seals the can after filling. Each piece of equipment is dedicated to a small range of products and not all products are in production at the same time. This permit is written with the three production areas having an area wide emission limit. This will maximize production flexibility while still maintaining limits on air emissions.

Natural gas is the primary fuel for the process ovens and the VOC incinerator. Ball maintains a 30,000 gallon propane tank as a fuel source during natural gas curtailment.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective November 18, 2012
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective November 18, 2012

Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.2	0.6
		PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	108.7	304.2
		CO	1.3	5.7
		NO _x	1.6	6.8
HAPs			67.37	9.9/24.9**
SN-02 SN-04 & SN-05 SN-06 & SN-07 SN-08 & SN-09 SN-12 & SN-13 SN-22 SN-24 & SN-25 SN-27	End Sealer Lines #8, #3, #6, #5, #4, #1, and #2	VOC HAPs*	67.7 27.2	172.0 9.9/24.9**
SN-14, SN-15, SN-16, SN-17, SN-19, SN-20, SN-20A &	Can Lines #6, #2, #1, #4, #7, #8 and Aerosol Can Line	VOC HAPs*	27.2 26.5	73.9 9.9/24.9**

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
SN-20B	Line (SN-14)			
SN-26	Can Line #11	PM/PM ₁₀	0.1	0.1
		VOC	5.1	20.0
		HAPs	5.07	9.9/24.9**
SN-23	Basecoater Lines #1 through #3 with Incinerator	PM/PM ₁₀	0.1	0.5
		SO ₂	0.1	0.1
		VOC	14.79	38.3
		CO	1.3	5.7
		NO _x	1.6	6.8
		HAPs	14.79	9.9/24.9**

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

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SECTION III: PERMIT HISTORY

The facility began manufacturing cans in 1949 as Heekin Can, Inc. The facility operated until 1979 with one basecoater, at which time the second basecoater was installed.

Permit #782-A was issued on August 25, 1987, Heekin Can, Inc. received its first air permit for 798.6 tons per year of VOC emissions. The permit included the installation of the third basecoater and a catalytic incinerator to burn VOC fumes from all three basecoaters. The incinerator was 91.5% efficient in the destruction of VOCs during a test conducted in December 1993.

Permit #782-AR-1 was issued to Heekin Can, Inc. on July 6, 1990, to reflect the installation of a double die can-end press with two can-end seal liner machines (SN-24 and SN-25). The old can-end manufacturing line (SN-03) was dismantled and removed from the facility. The permitted VOC emissions were increased to 834.52 tons per year.

On March 19, 1993, Heekin Can, Inc. was sold to the Bell Corporation and the name changed to Ball Metal Food Container Corporation.

Permit #782-AOP-R0 was the first Title V permit was issued to the facility on January 25, 1998. There were no changes to the facility at that time.

Permit #782-AOP-R1 was issued on October 8, 2003. Changes to the permit included the removal of SN-21 (Can line #8) from service and a notation to the insignificant activities list regarding propane as a fuel in the oven sources.

Permit #782-AOP-R2 changed the language of Specific Conditions #14 and #15 to reflect an overall VOC and HAP removal efficiency of 80% as a combined capture and destruction efficiency at the basecoaters, SN-23.

Permit #782-AOP-R3 was issued September 18, 2006. This permit action included an overall removal efficiency of 99% as a combined capture and destruction efficiency at the basecoaters, SN-23. This permit action also limited the facility to a minor source of HAP emissions.

Permit #782-AOP-R4 was issued January 5, 2010. This permit action was the result of the facility's air permit renewal application. This permit included the removal of a can line (SN-18) the installation of two new can lines (SN-20A and SN-20B) and a multi-die end line as an insignificant activity.

Permit #782-AOP-R5 was issued May 19, 2011. This permit action lowered the destruction efficiency of the incinerator from 99% to 98%. Facility emissions were not changed this permit action.

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Permit #782-AOP-R6 was issued August 22, 2012. This permit action allowed the installation of an additional can assembly line (SN-26). This modification increased VOC emissions by 20 tons per year and PM/PM₁₀ emissions by 0.1 tons per year.

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SECTION IV: SPECIFIC CONDITIONS

- SN-02, Food Can End Seal Liner #8
- SN-04 and SN-05, Food Can End Seal Liner #3
- SN-06 and SN-07, Food Can End Seal Liner #6
- SN-08 and SN-09, Food Can End Seal Liner #5
- SN-12 and SN-12, Food Can End Seal Liner #4
- SN-22, Food Can End Seal Liner #1
- SN-24 and SN-25, Food Can End Seal Liner #2
- SN-27, End Sealer Line #10

Source Description

Coated sheets of plated steel are fed through a punch press which punches out the circular can ends. At the outer edge of each can end is an area called the curl; the curl is a channel in which the end sealing compound is applied. Sealing compound is placed into the curl to form a hermetic seal when the can end is properly double seamed onto the can body. The can ends are automatically fed into a machine that clamps and rotates the can ends curl side up. The sealing compound, a viscous liquid, is pumped through a nozzle into the curl. The compound is applied during two revolutions of the can end to insure a uniform thickness. Upon completion of the compound lining application, the can ends are stored for at least 24 hours to allow the compound to cure. The cured can ends are either shipped to customers as can tops or returned to the can manufacturing area to be attached to the can body. Can End Seal Liner #2 has a video jet applicator to date code the packaging box. The VOC emissions from this operation are included in the area's emissions.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 6. [Regulation 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
SN-02, SN-04, SN-05, SN-06 SN-07, SN-08, SN-08, SN-12 SN-13, SN-22, SN-24, SN-25, and SN-27	End Sealer Lines	VOC	67.7	172.0

*Plantwide HAP limit.

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2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 7. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-02, SN-04, SN-05, SN-06 SN-07, SN-08, SN-08, SN-12 SN-13, SN-22, SN-24, SN-25, and SN-27	End Sealer Lines	HAPs	27.2	9.9/24.9*

3. The permittee shall not use any VOC-containing compound at the end-sealing sources (except SN-27) with a total VOC content greater than 5.5 pounds per gallon. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]
4. The permittee shall not use any VOC-containing compound at End Sealer Line SN-27 with a total VOC content greater than 3.6 pounds per gallon. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]
5. The permittee shall not use any HAP-containing compound at the end-sealing sources with a total HAP content greater than 2.59 pounds per gallon. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. The permittee shall maintain monthly totals, in tons, of VOC used to demonstrate compliance with Specific Condition 1. These records shall also contain a monthly summary of the total end seal compounds and inks, referenced by product number, used as well as VOC content regarded as pound per gallon to demonstrate compliance with Specific Conditions 1 and 3. Records shall be updated by the 30th day of the month following the month for which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
7. The permittee shall maintain monthly totals, in tons, of individual HAP used to demonstrate compliance with Specific Condition 2. These records shall also contain a monthly summary of the total end seal compounds and inks, referenced by product number, as well as the individual HAP content and TLV recorded as pound per gallon to demonstrate compliance with Specific Conditions 2 and 5. Records shall be updated by the 30th day of the month following the month for which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-14 Aerosol Can Line, SN-15 Can Line #6, SN-16 Can Line #2, SN-17 Can Line #1, SN-19 Can Line #5, SN-20 Can Line #7, SN-20A Can Line #9, SN-20B Can Line #10 and SN-26 Can Line #11

Source Description

Can body blanks are rolled into a cylinder and then transferred through welding rolls. The two edges of the blank are welded together to form a can body. The welded can body is transferred over a side seam stripe spray nozzle, where organic lacquer is applied to the inside surface to cover the strip of bare metal exposed by the weld. The can body then passes through an oven to cure the coating. After curing, the conveyor is sufficiently long enough to allow the cans to cool before the beading operation. Beads or grooves are added to the circumference of the can body to add strength and rigidity to the can. Both ends of the body are flanged and a can end is attached to one end. Next the can is pressurized and tested for leaks. Can Lines #1 through #6, #9, #10 and #11 are equipped with video jet applicators to date code the can. The VOC emissions from this operation are included in the area's emissions. In the final step the can is palletized and moved to the warehouse for shipping.

Specific Conditions

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by 10. [Regulation 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
SN-14, SN-15 SN-16, SN-17 SN-19, SN-20 SN-20A, SN-20B	Aerosol Can Line (SN-14), Can Lines #3, #6, #2, #1, #7, #9 and #10	VOC	27.2	73.9
SN-26	Can Line #11	PM ₁₀ VOC	0.1 5.1	0.1 20.0

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by 12. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-14, SN-15, SN-16, SN-17 SN-19, SN-20, SN-20A and SN-20B	Aerosol Can Line (SN-14), Can Lines #3, #6, #2, #1, #7, #9 and #10	HAPs	26.5	9.9/24.9*
SN-26	Can Line #11	PM HAPs	0.1 5.07	0.1 9.9/24.9*

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10. The permittee shall not use a VOC-containing side seam coating at can line sources SN-14, SN-15, SN-16, SN-16, SN-17, SN-19, SN-20, SN-20A, SN-20B and SN-26 with a total VOC content greater than 5.5 pounds per gallon. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]
11. The permittee shall maintain monthly totals, in tons, of VOC used to demonstrate compliance with Specific Condition 8. These records shall also contain a monthly summary of the total side seam coatings, referenced by product number, used as well as VOC content regarded as pound per gallon to demonstrate compliance with Specific Conditions 10. Records shall be updated by the 30th day of the month following the month for which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
12. The permittee shall not use a HAP-containing side seam coating at can line sources SN-14, SN-15, SN-16, SN-16, SN-17, SN-19, SN-20, SN-20A and AN-20B with a total HAP content greater than 5.43 pounds per gallon. [Regulation 18, §18.1004, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]
13. The permittee shall maintain monthly totals, in tons, of individual HAP used to demonstrate compliance with Specific Condition 9. These records shall also contain a monthly summary of the total side seam coatings, referenced by product number, as well as the individual HAP content and TLV recorded as pound per gallon to demonstrate compliance with Specific Conditions 9 and 12. Records shall be updated by the 30th day of the month following the month for which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-23, Basecoater Lines #1 thru #3 with Incinerator

Source Description

Raw material arrives at the facility in the form of plated steel coils. The coils are unrolled, straightened, and fed into a sheer which cuts the metal into plates or sheets. The plates are specifically cut for can ends or can bodies. The sheets are stacked and transported to one of the three basecoaters.

The basecoater applies the enamel to the sheets at the proper film thickness. The enameled surface of the sheet will become the interior of the can. The enamel application mechanism of the basecoater consists of two steel rollers, mounted one above the other. The bottom roller, revolving in a pan of enamel, picks up a film for transfer to the top steel roller. The spacing between the steel rollers meters the amount of enamel applied to the top roller. The top roller transfers the film to a composition roller which in turn transfers the film onto the sheet. A fourth roller, a steel "back up" roller, mounted under the composition roller holds the sheet against the composition roller as the enamel is applied. Permanent total enclosures surround each coater, capturing VOC emissions and routing them through the ovens to the incinerator.

The wet enameled sheets are transferred onto a wicket and then into the drying oven. A wicket is a heavy wire frame that keeps the sheets separated as it carries them vertically through the oven. The oven drives off the solvents and cures the coating to a hard finish. The solvent vapors are collected and routed to the incinerator. After curing, the sheets are stacked and transferred to one of the can lines or one of the can end liners.

The incinerator is a natural gas fired unit with a 4.8 MM BTU/hr burner that burns the fumes collected from the enamel applicators on the three basecoaters and the fumes from the three drying ovens. With the installation of permanent total enclosures (PTE) surrounding each basecoater line, 100% capture efficiency is achieved. To effectively destroy emissions, the temperature in the incinerator must be maintained at 1325° F or above.

Specific Conditions

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 18 and permitting the burner at maximum capacity. [Regulation 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
23	Basecoater Lines #1 thru #3 with Incinerator	PM ₁₀	0.1	0.5
		SO ₂	0.1	0.1
		VOC	14.7	38.0
		CO	1.3	5.7
		NO _x	1.6	6.8

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15. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 18. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
23	Basecoater Lines #1 thru #3 with Incinerator	PM HAPs	0.1 14.8	0.5 9.9/24.9*

*Plantwide HAP limit.

16. The permittee shall not use a VOC-containing sheet coating at SN-23 with a total VOC content greater than 6.66 pounds per gallon. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. The permittee shall not use any HAP-containing sheet coating at SN-23 with a total HAP content greater than 6.66 pounds per gallon. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee shall maintain monthly totals, in tons, of VOC emissions referenced by product number to demonstrate compliance with Specific Condition 14. Calculations at the enclosed source shall consist of only the destruction efficiency of the thermal oxidizer at the most recent VOC test event. These records shall also contain a monthly summary of the sheet coatings and inks used, referenced by product number, and the VOC content recorded as pound per gallon to demonstrate compliance with Specific Conditions 14 and 16. Records shall be updated by the 30th day of the month following month for which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
19. The permittee shall maintain monthly totals, in tons, of HAP emissions to demonstrate compliance with Specific Condition 15. Calculations at the enclosed source shall consist of only the destruction efficiency of the thermal oxidizer at the most recent VOC test event. These records shall also contain a monthly summary of total sheet coatings and inks used, referenced by product number, as well as the individual HAP content recorded as pound per gallon to demonstrate compliance with Specific Conditions 15 and 17. Records shall be updated by the 30th day of the month following the month for which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The permittee shall maintain the following operational parameters in order to continuously demonstrate compliance with the 100% capture efficiency used in the VOC emission calculations. These parameters are the defining criteria for a permanent total

enclosure. [Regulation No.19 §19.705 et seq. effective July 18, 2009, and 40 CFR Part 52, Subpart E]

- a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point. An “equivalent diameter” is the diameter of a circle that has the same area as the opening. The equation for an equivalent diameter (ED) is:

$$ED = \sqrt{\left(\frac{A}{\pi} \right)}$$

For a circular NDO, this equation simply reduces to the diameter of the opening.

- b. The total area of all NDOs shall not exceed five percent of the surface area of the enclosure’s walls, floor, and ceiling.
 - c. The average face velocity (FV) of air through each NDO shall be at least 200 ft/min. The direction of air through all NDOs shall be into the enclosure.
 - d. All access doors and windows whose areas are not included as NDOs shall be closed during routine operation of the process.
21. The permittee shall maintain documentation of the design parameters which demonstrate compliance with Specific Conditions 19(a) and (b). This documentation shall be maintained on site and shall be provided to Department personnel upon request. [Regulation No. 19 §19.703 et seq. and 40 CFR Part 52, Subpart E]
 22. The permittee shall install and operate a pressure gauge which verifies the pressure differential across the total enclosure. A pressure differential of 0.007 inches of water will demonstrate compliance with the 200 ft/min face velocity requirement contained in Specific Condition 19(c). The pressure differential shall be monitored by means of a gauge which measures the drop in air pressure.

The gauge shall be monitored once every six months for a one-hour period. Readings shall be recorded during this one hour period every five minutes and the number of basecoater lines operating at that time shall be noted. These records shall be maintained on site and shall be provided to Department personnel upon request. These reports shall also be submitted to the Department per General Provision 7 by the last day of the month after the reported six month period. [Regulation No. 19, §19.703 et seq., 40 CFR Part 52, Subpart E, and 40 CFR Part 64, §64.6(c)(1)]

23. For the Incinerator for the Basecoater Sources (SN-23), the permittee shall:
 - A. Install, operate, and maintain a device to continuously monitor and record the pressure in the incinerator inlet duct. A negative pressure shall be maintained at or above 1.35 inches of water. [§19.304 of Regulation 19 and 40 CFR Part §64.6(c)(1)]
 - B. Install, operate, and maintain a device to continuously monitor and record the operating temperature of the incinerator. The incinerator temperature shall be maintained at or above 1325oF. [§19.304 of Regulation 19 and 40 CFR Part §64.6(c)(1)]

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- C. Monitor the incinerator's temperature recorder and the inlet duct pressure recorder on site. These records shall be maintained on site and be made available to Department personnel upon request. [§19.304 of Regulation 19 and 40 CFR Part §64.6(c)(3)]
24. For the Incinerator for the Basecoater Sources (SN-23), the permittee shall:
- A. Maintain records that summarize the number, duration, and cause of excursions or exceedances of limits as well as corrective action taken. [§19.304 of Regulation 19 and 40 CFR §64.9(a)(2)(i) and §64.9(b)]
 - B. Maintain records that summarize the number, duration, and cause of monitoring equipment downtime incidents, other than routine downtime for calibration checks. [§19.304 of Regulation 19, 40 CFR §64.9(a)(2)(ii) and §64.9(b)]
 - C. Maintain a QIP (quality improvement plan) threshold of no more than nine excursions per six-month reporting period. Upon exceedance of this threshold, the permittee shall then develop a QIP. [§19.304 of Regulation 19 and 40 CFR §64.9(a)(2)(iii) and §64.9(b)]
 - D. If required by Specific Condition 23(C), maintain records that describe the actions taken to implement a quality improvement plan (QIP), and upon completion of the QIP, documentation shall be maintained to confirm that the plan was completed and reduced the likelihood of similar excursions or exceedances. [§19.304 of Regulation 19 and 40 CFR §64.9(a)(2)(iii) and §64.9(b)]
 - E. Submit information pertaining to exceedances or excursions from permitted values in semi-annual reports in accordance with General Provision #7. [§19.304 of Regulation 19 and 40 CFR §70.6(a)(3)(iii)(A)]
25. The permittee shall test the incinerator every five years to ensure that the incinerator's destruction efficiency is 98.0% or greater. Testing shall be conducted at a minimum incinerator temperature of 1,325°F. [§18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311.]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Ball Metal Food Container Corp. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) calendar days after completing the testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. The permittee must provide:
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.

[Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19 §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. For the purposes of this air permit, the semi-annual reporting periods referenced in General Provision #7 shall be established as January through December and July through June. [40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

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8. The permittee shall not exceed the following HAP formulated limits for compounds at the facility. The TLV of a particular compound will be determined using information on the appropriate MSDS or the most recent ACGIH data. Compliance with this condition will be demonstrated by Plantwide Condition 9. For the purposes of compliance with this condition, formaldehyde shall have a TLV of 1.5 mg/m³. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Minimum TLV	Maximum lb/gal HAP per Source			
	End Lines	Can Lines	Base Coater	SN-26
78.25	2.59	5.4	6.66	5.43
70.42	2.3	4.8	5.9	4.8
62.60	2.0	4.3	5.2	4.3
54.77	1.8	3.7	4.6	3.8
46.95	1.5	3.2	3.9	3.2
36.12	1.2	2.7	3.3	2.7
31.3	1.0	2.1	2.6	2.1
23.47	0.7	1.6	1.9	1.6
15.65	0.5	1.0	1.3	1.0
7.82	0.2	0.5	0.6	0.5

9. The permittee shall maintain monthly records of HAP containing material usage and the associated MSDS which demonstrate compliance with Plantwide Condition 8. Records shall be updated by the thirtieth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site and shall be submitted to the Department in accordance with General Provision 7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall not exceed a hazardous air pollutant emission rate of 9.9 tons single nor 24.9 tons combination HAPs per consecutive twelve month period. This total includes 0.1 tons of Hexane emissions from SN-23. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee shall maintain monthly totals, of individual and combination HAP emissions to demonstrate compliance with Plantwide Condition 10. These records shall also contain a monthly summary of the end seal compounds, inks, and coatings used at this facility, referenced by product number, as well as the individual pounds of HAP per gallon to demonstrate compliance with Plantwide Condition 10. Records shall be updated by the 30th day of the month following the month for which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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12. For demonstration of compliance with the conditions of this permit, all calculations, recordkeeping and monitoring of emissions and other data shall be based on defensible data. When using data consisting of ranges of values the permittee shall use the worst-case values (resulting in the highest estimated emissions) in calculations or reporting.

The permittee shall demonstrate that the degree of accuracy of the calculations used to determine emissions is sufficient to prove that the permit thresholds (i.e. 9.9/24.9 tpy of individual/combined HAPs) have not been exceeded if actual emissions are calculated at or above 95% of the major threshold. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Title VI Provisions

13. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
14. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC like appliance" as defined at §82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

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15. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
16. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.

17. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated June 19, 2008, and comments dated July 11, 2011.

Description	Category
Coater 1 Oven, 2.45 MMBtu/hr	A-1
Can Line Oven 1, 0.6 MMBtu/hr	A-1
Can Line Oven 2, 0.21 MMBtu/hr	A-1
Can Line Oven 3, 0.21 MMBtu/hr	A-1
Can Line Oven 5, 0.6 MMBtu/hr	A-1
Can Line Oven 6, 0.6 MMBtu/hr	A-1
Can Line Oven 11, 0.53 MMBtu/hr	A-1
Day Tank, 293 gallons	A-3
(3) Bulk Tanks, 10,000 gallons per tank	A-3
Bulk Tank, 10,000 gallons	A-13
Multi-Die End Line	A-13

*Natural gas or propane may be used.

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SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and Regulation 26 §26.701(B)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26 §26.701(C)(2)]

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26 §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the month six months after the issuance of the initial Title V permit and every six months thereafter. The report is due on the first day of the second month after the end of the reporting period. The first report due after issuance of the initial Title V permit shall contain six months of data and each report thereafter shall contain 12 months of data. The report shall contain data for all monitoring requirements in effect during the reporting period. If a monitoring requirement is not in effect for the entire reporting period, only those months of data in which the monitoring requirement was in effect are required to be reported. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

[40 CFR 70.6(a)(3)(iii)(A) and Regulation 26 §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;
 - v. The duration of the deviation;
 - vi. The average emissions during the deviation;
 - vii. The probable cause of such deviations;

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- viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
- ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19 §19.601 and §19.602, Regulation 26 §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26 §26.701(E), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26 §26.701(F)(1)]
- 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26 §26.701(F)(2)]
- 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26 §26.701(F)(3)]

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13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26 §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26 §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26 §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;

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- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

- 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually. If the permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due on the first day of the second month after the end of the reporting period. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26 §26.703(E)(3)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

- 22. Nothing in this permit will alter or affect the following: [Regulation 26 §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

- 23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- 24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:

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- a. Such an extension does not violate a federal requirement;
- b. The permittee demonstrates the need for the extension; and
- c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18 §18.314(A), Regulation 19 §19.416(A), Regulation 26 §26.1013(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:

- a. Such a request does not violate a federal requirement;
- b. Such a request is temporary in nature;
- c. Such a request will not result in a condition of air pollution;
- d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18 §18.314(B), Regulation 19 §19.416(B), Regulation 26 §26.1013(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:

- a. The request does not violate a federal requirement;
- b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
- c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

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[Regulation 18 §18.314(C), Regulation 19 §19.416(C), Regulation 26 §26.1013(C),
A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart
E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to Ball Metal Food Container Corp., P.O. Box 589, Broomfield, CO, 80038, on this 26th day of November, 2013.



Pam Owen, AAI, Air Division